

## 4.0 SCEA ENVIRONMENTAL CHECKLIST

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

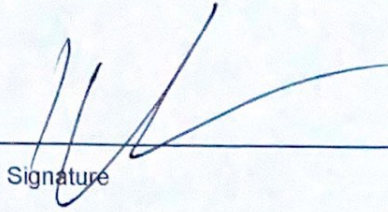
	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology and Soils		Greenhouse Gas Emissions		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities and Service Systems		Wildfire		Mandatory Findings of Significance

**DETERMINATION:** (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the Project could have a potentially significant effect on the environment as identified in the Initial Study contained herein, there will not be a significant effect in this case, because this Sustainable Communities Environmental Assessment (SCEA) contains measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.	<b>X</b>

4.0 SCEA Environmental Checklist



Signature

3/4/21

Date

Kevin Johnson

Printed Name

Senior Planner

Title



## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, “Earlier Analysis,” may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See *CEQA Guidelines* Section 15063(c)(3)(D). Earlier analyses are discussed in Section 21 at the end of the checklist.
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- c) Mitigation Measures. For effects that are “less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significant.

## ENVIRONMENTAL CHECKLIST FORM

### BACKGROUND

Date checklist submitted:

Department requiring checklist: Planning & Community Development

Case Manager: Kevin Johnson, Senior Planner

### ENVIRONMENTAL IMPACTS (explanations of all answers are required):

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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#### 4.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

a. Have a substantial adverse effect on a scenic vista?

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☐
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**WHY?** The project site is not in an area that offers views of the San Gabriel Mountains, the Arroyo Seco, the San Rafael Hills, Eaton Canyon, or Old Pasadena.

The historic significance of the Hotel Green/Castle Green is largely conveyed by the public-facing primary facades oriented towards the adjoining public streets. These include the east façade of the Castle Green portion of the building facing east to Raymond Avenue, the south end of Castle Green facing Dayton Street, and the north façade of the Hotel Green portion of the building facing Green Street. Typically, these facades are considered “primary” because they were designed to directly address and communicate with the public right-of-way forming the “front” of the two buildings. It is these facades that contain public entrances and the highest level of design articulation, exterior ornamentation, and variations in massing and rooflines.

In contrast, the west-facing façade of the Castle Green portion and south-facing façade of the Hotel Green were somewhat less concerned with engaging the public as they front interior park and patio spaces. Anticipated development fronting Fair Oaks Avenue (never realized) would have further enclosed the interior of the block. Although also public facing in that they look onto park space and are visible from the park and Dayton Street, comparatively, these facades represent the “rear” elevations of the two buildings in that they did not provide primary entrance into the two buildings. As such, they are generally considered “secondary.” While still carefully articulated, these facades display less of the variation and exterior ornamentation seen on the facades facing Raymond Avenue and Green Street.

The primary (east) façade of the Castle Green portion of the building faces east towards Raymond Avenue. This façade was historically, and remains today, the primary entrance to the Castle Green. The building was set back approximately 100 feet from the street to create a landscaped park-like area fronting the main entrance. This garden was the only park-like feature in Pasadena at the time. Extending from the center of this façade to the curb of Raymond Avenue is the remaining section of an enclosed pedestrian bridge that once spanned the street and linked to the original Hotel Green building (no longer extant) across the street. The design articulation of east façade, the remnant pedestrian bridge and the front garden all combine to create the primary public face of the building.

The proposed project would obscure views of the existing Green Hotel Apartments from certain vantage points within Central Park to the south. However, the Green Hotel Apartments are already obscured by the trees located on or near the project site as well as within Central Park. The density of the existing tree canopy of Central Park as well as the tree canopy at the project site obstructs views of the existing Green Hotel Apartments and Castle Green from multiple angles. Furthermore, the portion of the Green Hotel Apartments between Castle Green and the proposed project would continue to be visible to the visitors of Central Park when looking immediately north across Dayton Street to the existing Green Hotel Apartment building. Views of Castle Green from Central Park would be unchanged. Therefore, views of the Green Hotel Apartments and Castle Green from Central Park would be altered; however, their primary elevations on East Green Street and South Raymond Avenue would remain unaltered and views of the south-facing façade of these two buildings would still mostly remain from within Central Park.



From the perspective of the existing Green Hotel Apartment residents, the proposed project would obstruct views to the south of Dayton Street, Fair Oaks Avenue, Central Park, and its tree canopy. The residents at the eastern end of the Green Hotel Apartments would continue to see Dayton Street and Central Park to the south. While the proposed project would affect private views from certain residences in the Castle Green and Green Hotel Apartment building, CEQA emphasizes evaluation of visual resources that are visible from public places, like streets, sidewalks, and parks. Although the project might affect private views, obstruction of private views is not generally regarded as a significant environmental impact under CEQA. Furthermore, the project would not in any way obstruct the views of any of the historic buildings or other scenic resources in the vicinity.

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within Transit Priority Areas (TPAs), aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in Chapter 3, SCEA Eligibility, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, pursuant to CEQA Section 21099(d), the project would have no impact to scenic vistas.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** The only designated state scenic highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which located north of Arroyo Seco Canyon in the extreme northwest portion of the City. The project site is not within the viewshed of the Angeles Crest Highway. Nor is the site visible from I-210, which is identified as an eligible state scenic highway west of S.R. 134 in Caltrans' Scenic Highway Program.

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within Transit Priority Areas (TPAs), aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in Chapter 3, SCEA Eligibility, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, the proposed project would have no impacts to state scenic highways or scenic roadway corridors.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** Senate Bill 743, signed into law in September 2013, made several changes to CEQA for projects located in areas served by transit (i.e., TPAs). While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and
2. The project is located on an infill site within a transit priority area.

Section 21099 (a) of the PRC defines the following terms:

(4) "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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(7) "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned.

Section 21064.3 of the PRC defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

As discussed in the Project Description, the project site is surrounded by existing development, thus qualifying the project site as an 'infill' site. In addition, the project consists of a mixed-use residential community. Further, the Los Angeles County Metropolitan Transportation Authority (Metro) Del Mar L Line (formerly known as the Gold Line) Light Rail Station is located less than a quarter of a mile to the southeast of the project site along Raymond Avenue just north of Del Mar Boulevard and the Memorial Park Station is located less than a half mile to the northeast of the project site along Holly Street at the terminus of N. Arroyo Parkway. For these reasons, the proposed project qualifies for this exemption, and the analysis below is provided for informational purposes only.

To provide context for project impacts related to visual character and public views, eight visual simulations of the project were prepared and are presented in **Figure 4.1-1** through **Figure 4.1-9**. The visual simulations are based on the conceptual plans for the proposed project and are intended to generally depict the project's building heights and massing relevant to the assessment of aesthetic impacts. Each figure presented below also contains a corresponding photograph showing the existing view for comparison.

#### ***View A (Project Site looking South along Fair Oaks Avenue)***

This view is located at the intersection of Fair Oaks Avenue and Green Street looking south towards the project site. Currently, a view into Central Park, located south from the project across Dayton Street, is present. However, trees from both the project site and the adjacent Green Hotel Apartments obscure some of the view into Central Park from this location. The western face of the Green Hotel Apartments is viewable from this location running along Fair Oaks Avenue.

Construction of the project would obscure some of the view into Central Park from this location; however, trees and areas located on the western portions of the park would still be visible. The building height and massing would appear similar to the Green Hotel Apartments, which would be located just north of the project along Fair Oaks Avenue. This would create a longer building block face along Fair Oaks Avenue until the intersection of Dayton Street. The visual simulation reflects that the design, colors, and finish



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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materials of the project would be similar to the Green Hotel Apartments and be compatible with the existing environment and surrounding uses.

Pasadena Municipal Code §17.30.040 provides the general development standards for the Central District. The proposed project would be consistent with the site's development standards, such as for building height (75 feet building height maximum, 90 feet utilizing height averaging), setbacks (none required but allowable up to 5 feet along Dayton Street), and Floor Area Ratio (3.00:1 FAR). The proposed project would have an average height of 69 feet and maximum roof height of 90 feet. There would be no setback along Fair Oaks Avenue and a setback of 2 feet along Dayton Street at the work/live units. The proposed project would have a Floor Area Ratio of 2.89:1.

The proposed project would also comply with the City of Pasadena Ordinance No. 6896 "City Trees and Tree Protection Ordinance. As discussed below in the Biological Resources impact analysis, nine of the trees onsite and all of the adjacent street trees, a total of 17 trees, were noted as being protected under Ordinance 6896. Applications for Private Tree Removal and a landscape plan for the proposed project are required to be prepared and submitted for approval by the Design Commission in conjunction with the design review process. The applications for Private Tree Removal will be required to provide information and documentation to substantiate one or more of the findings for removal of protected trees listed in PMC Section 8.52.075(A). In addition, for any trees that are permitted to be removed using Tree Protection Ordinance finding #6, the required landscape plan will be required to demonstrate the minimum replacement ratio noted in the adopted Tree Replacement Matrix for the existing, protected trees and meet the requirements of the City of Pasadena City Trees and Tree Protection Ordinance No. 6896.

Since the project is within an urban area and would comply with regulations governing scenic quality, impacts would be less than significant.

#### ***View B (Project Site looking East along Dayton Street)***

This view is located along Dayton Street, across Fair Oaks Avenue, looking east towards the project site. Currently, from this location, the southern edge of the Castle Green, including the distinctive turret, is viewable across the project site which is currently in use as a surface parking lot.

Construction of the project would be similar in building height and massing to the existing Green Hotel Apartments and Castle Green. The height of the proposed project is permissible under the maximum height limits of the Central District Specific Plan and the Pasadena Municipal Code. Looking east from Dayton Street, the project would block views of Castle Green from this vantage point. However, from the View B

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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vantage point, the southwest corner rotunda of Castle Green would still be visible. Furthermore, as elaborated below in the Cultural Resources impact analysis, the primary east- and west-facing facades would remain unobstructed. Therefore, given that the most prominent aesthetic views of Castle Green would not be affected, impacts from this vantage point are not considered to be a significant impact.

Furthermore, Design Review for the project would ensure the project's compatibility with existing and surrounding uses as it relates to architecture, materials, scale, massing, color, lighting, landscaping, and other design concepts. As discussed above for View A, the proposed project would be consistent with the site's development standards, the City Trees and Tree Protection Ordinance, and regulations governing the existing conditions of the site and the site's historic significance. Since the project is within the urban core of the City, compliance with regulations governing scenic quality would ensure impacts would be less than significant.

***View C (Project Site looking Northwest along Dayton Street)***

This view is located within Central Park, across Dayton Street and looking northwest into the project site. As the site is currently used as a surface parking lot, the buildings across Fair Oaks Avenue are currently visible from this vantage point. The rear elevation of the Green Hotel Apartments, located north of the project site, is also currently visible.

As the existing surface parking lot would be developed with the proposed six-story building, the buildings across Fair Oaks Avenue from the project site would be obscured from this vantage point upon construction of the project. As would be required by section 17.61.030 of the Pasadena Municipal Code and as the visual simulations demonstrate, the design, colors, and finish materials will be required to achieve compatibility with the surrounding area, including the Green Hotel Apartments. As discussed above for View A, the proposed project would be consistent with the site's development standards, the City Trees and Tree Protection Ordinance, and regulations governing the existing conditions of the site and the site's historic significance.

As discussed in the Cultural Resources impact analysis, since the existing condition of the site no longer reflects the landscape and recreational uses associated with the Hotel's period of significance, demolition of the billboard, surface parking lot, landscaped picnic area, shuffleboard court, and removal of the mature trees would not alter the property's integrity. Furthermore, while the project would remove/relocate some palms and trees, with the proposed landscaping plan palms and trees would remain a prominent visual resource in this viewshed.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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Since the project is in an urban area and would be required to comply with these local regulations governing scenic quality, impacts would be less than significant.

***View D (Project Site looking North from Central Park, across Dayton Street)***

This viewing location is from within Central Park looking north towards the project site and located about 230 feet from the project site. The south elevations of the Green Hotel Apartments and Castle Green are currently visible and located to the north and east of the project site, respectively. However, the current views to both buildings are slightly obscured by trees from within the park as well as the project's adjacent properties.

The project, once built, would be similar in height and massing as the portions of the Green Hotel Apartments and Castle Green that are currently visible from this vantage point. Some of the western edge of the Green Hotel Apartments would be obscured by the project; however, the terracing of the project would ensure that much of the Green Hotel Apartments would still be visible. Furthermore, as reflected in the visual simulations, the design, colors, and finish materials would be similar to the Green Hotel Apartments and Castle Green. As discussed above for View A, the proposed project would be consistent with the site's development standards, the City Trees and Tree Protection Ordinance, and regulations governing the existing conditions of the site and the site's historic significance. The project's compliance with regulations governing scenic quality would ensure impacts would be less than significant.

***View E (Project Site looking North from Central Park, across Dayton Street)***

This view is similar in location and distance to the view above, but from an angle with fewer trees from within the park obscuring current views of the project site. The Green Hotel Apartments are still slightly obscured by trees located on the project site.

From this vantage point, the visual simulations demonstrate that the proposed building would be more clearly seen as there would not be as much obstruction from trees within the park. The project would cover the western edge of the Green Hotel Apartments, but the terracing of the project would ensure much of the building is still visible from this angle. Furthermore, the building height and massing would be similar to the Green Hotel Apartments and design, colors, and finish materials would also be similar. As discussed above for View A, the proposed project would be consistent with the site's development standards, the City Trees and Tree Protection Ordinance, and regulations governing the existing conditions of the site and the site's historic significance. As the project is within the urban center of the City, compliance with regulations governing scenic quality would ensure that impacts are less than significant.



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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***View F (Project Site looking North from Central Park, across Dayton Street)***

This viewing location is located within Central Park, about 385 feet from the project site. Since this vantage point is from further within the park, trees from within the park obscure current views of much of the project site as well as the Green Hotel Apartments. Castle Green is virtually completely obscured by trees from this angle.

Construction of the project would obscure the portions of the Green Hotel Apartments that are visible from this vantage point. However, as noted above, much of the project site and Green Hotel Apartments would still be obstructed from view by trees within the park. While the project would obscure the Green Hotel Apartments located to the north of the project site, the project would be similar in height and massing. Therefore, the project would be compatible with the surrounding visual character and scenic quality. As discussed above for View A, the proposed project would be consistent with the site's development standards, the City Trees and Tree Protection Ordinance, and regulations governing the existing conditions of the site and the site's historic significance. Compliance with regulations regarding scenic quality, since the project is within the urban core of the City, would ensure that impacts are less than significant.

***View G (Project Site looking North along Fair Oaks Avenue)***

This viewing location is located along Fair Oaks Avenue south of Valley Street, approximately 500 feet from the project site and at an elevated angle. As with the view above, the project site and the Green Hotel Apartments are largely obscured by trees from within both Central Park and the project site.

The project, once built, would further obscure currently visible portions of the Green Hotel Apartments. However, the western portion of the Green Hotel Apartments would still be visible. The project's building height and massing would be similar to the Green Hotel Apartments and the design, color, and finish materials would be compatible with the surrounding area. As discussed above for View A, the proposed project would be consistent with the site's development standards, the City Trees and Tree Protection Ordinance, and regulations governing the existing conditions of the site and the site's historic significance. The project would comply with local regulations governing scenic quality and impacts would be less than significant.

***View H (Project Site looking North from Central Park, across Dayton Street)***

The view is located within Central Park, approximately 515 feet from the project site. The project site and Green Hotel Apartments are currently partially obscured by trees from within the park as well as trees on their respective lots. The Castle Green is virtually obscured from view by trees from this vantage point.







Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-2

View A





Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-3

View B





Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-4





Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-5

View D





Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-6





Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-7





Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-8





Existing View



Proposed View

SOURCE: VisionScape, 2020

FIGURE 4.1-9



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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With construction of the project, some of the western portions of the Green Hotel Apartments that are currently visible would be obscured. However, the project would be similar to the Green Hotel Apartments in building height and massing. Furthermore, the design, color, and finish materials would be compatible with the surrounding visual character and scenic quality. As discussed above for View A, the proposed project would be consistent with the site's development standards, the City Trees and Tree Protection Ordinance, and regulations governing the existing conditions of the site and the site's historic significance. The project would comply with regulations governing scenic quality within urban areas and impacts would be less than significant.

As required by section 17.61.030 of the Pasadena Municipal Code, the design of this project will be reviewed for design review approval by the Design Commission. This regulatory procedure was established to ensure that the design, colors, and finish materials of development projects comply with adopted design guidelines and achieve compatibility with the surrounding area. Although the project would not substantially degrade the visual character of the site and surroundings, this regulatory procedure provides the City with additional layer of review for aesthetics, and an opportunity to incorporate additional conditions to increase the aesthetic value of the project.

*d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

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**WHY?** The project would not have a significant impact on light and glare because it will be required to comply with the standards in the zoning code that regulate glare and outdoor lighting. Height and direction of any outdoor lighting and the screening of mechanical equipment must conform to the requirements of Zoning Code Section 17.40.080 which requires lighting to be energy efficient; to be confined to the maximum extent feasible within the boundaries of the site, and directed downward and away from adjoining properties and public rights-of-way; to not blink, flash or be of unusually high intensity or brightness as determined by the Zoning Administrator, and lighting fixtures to be appropriate in scale, intensity, and height to the use they are serving. The project does not propose any lighting for nighttime events or sporting activities. The only outdoor lighting included in the project are pedestrian safety lighting, landscaping lights, and four streetlights, as required by the Department of Public Works. The project is in an older, developed commercial/mixed-use urban area with streetlights in place, and the proposed exterior lighting would be consistent with the surrounding area. These lights are not substantial sources of glare and are an aide to public safety.



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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In addition, the project will be subject to design review, which provides the City with an additional layer of review for aesthetics including light and glare, and an opportunity to incorporate additional conditions to improve the project's building materials and lighting plans.

Pursuant to regulations provided in SB 743, which applies to residential, mixed-use residential, and employment center projects on infill sites within Transit Priority Areas (TPAs), aesthetic impacts cannot be considered significant. A TPA is defined as an area within one-half mile of a main transit stop that is existing or planned. As noted in Chapter 3, SCEA Eligibility, the proposed project qualifies as a Transit Priority Project (TPP). Therefore, impacts would be less than significant.

## 4.2 AGRICULTURAL RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

☐ ☐ ☐ ☒

**WHY?** The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which runs from north to south through the City. It has commercial recreation, a public park, and natural open space. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

- b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

☐ ☐ ☐ ☒

**WHY?** The City of Pasadena has no land zoned for agricultural use other than commercial growing areas. Commercial Growing Area/Grounds is permitted in the CG (General Commercial), CL (Limited

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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Commercial), and IG (General Industrial) zones and conditionally in the RS (Residential Single-Family), and RM (Residential Multi-Family) districts. The use is also permitted within certain specific plan areas. The project site is located in a developed urban area, zoned CD-1 (Central District Specific Plan, Sub-district 1). The City has no Williamson Act contract land. No agricultural uses exist within the proposed project area; therefore, no impacts would occur with regard to existing zoning for agricultural use or Williamson Act contract lands.

- 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 Timberland Production (as defined by Government Code Section 51104 (g))?*

☐ ☐ ☐ ☒

**WHY?** There is no timberland or Timberland Production zone in the City of Pasadena; therefore the proposed project would not result in the loss of forest land, timberland or Timberland Production areas.

- d. *Result in the loss of forest land or conversion of forest land to a non-forest use?*

☐ ☐ ☐ ☒

**WHY?** There is no forest land in the City of Pasadena; therefore the proposed project would not result in the conversion or loss of forest land.

- 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?*

☐ ☐ ☐ ☒

**WHY?** There is no known farmland in the City of Pasadena; therefore the proposed project would not result in the conversion of farmland to a non-agricultural use.

#### 4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

This section is based on the information provided in the California Emissions Estimator Model (CalEEMod) 2016.3.2 model using assumptions from the Project Applicant for project construction and operational emissions. The CalEEMod output report is incorporated herein by this reference, and provided in Appendix B to this Draft SCEA.

The significance criteria established by the applicable air quality management or air pollution control district (SCAQMD) may be relied upon to make the above determinations. According to the SCAQMD, an air quality

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impact is considered significant if the proposed project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality for construction and operational activities of land use development projects, shown in **Table 4.3-1, South Coast Air Quality Management District Regional Significance Thresholds – Pounds per Day**.

**Table 4.3-1**  
**South Coast Air Quality Management District Regional Significance Thresholds – Pounds per Day**

Mass Daily Thresholds <sup>a</sup>		
Pollutant	Construction <sup>b</sup>	Operation <sup>c</sup>
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO <sub>2</sub> eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants <sup>d</sup>		
NO <sub>2</sub>	South coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	0.18 ppm (state)	
annual arithmetic mean	0.03 ppm (state) and 0.0534 ppm (federal)	
PM10	10.4 µg/m <sup>3</sup> (construction) <sup>e</sup> & 2.5 µg/m <sup>3</sup> (operation)	
24-hour average	1.0 µg/m <sup>3</sup>	
annual average		
PM2.5	10.4 µg/m <sup>3</sup> (construction) <sup>e</sup> & 2.5 µg/m <sup>3</sup> (operation)	
24-hour average		
SO <sub>2</sub>	0.25 ppm (state) & 0.075 ppm (federal - 99th percentile)	
1-hour average	0.04 ppm (state)	
24-hour average		
Sulfate	25 µg/m <sup>3</sup> (state)	
24-hour average		
CO	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
1-hour average	20 ppm (state) and 35 ppm (federal)	
8-hour average	9.0 ppm (state/federal)	

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
Lead				
30-day Average		1.5 µg/m <sup>3</sup> (state)		
Rolling 3-month average		0.15 µg/m <sup>3</sup> (federal)		
<sup>a</sup> <b>SOURCE:</b> South Coast AQMD CEQA Handbook (South Coast AQMD, 1993)				
<sup>b</sup> Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).				
<sup>c</sup> For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.				
<sup>d</sup> Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.				
<sup>e</sup> Ambient air quality threshold based on South Coast AQMD Rule 403.				

## CO Hotspot Analysis

In addition to the daily thresholds listed above, development associated with the proposed project would also be subject to the ambient air quality standards. These are addressed through an analysis of localized CO impacts. The California 1-hour and 8-hour CO standards are:

- 1-hour = 20 parts per million
- 8-hour = 9 parts per million

The significance of localized impacts depends on whether ambient CO levels in the vicinity of the project site are above state and federal CO standards. Carbon monoxide concentrations in Pasadena no longer exceed either the CAAQS or the NAAQS criteria. Additionally, the SCAB region is designated as attainment under the 1-hour and 8-hour standards (see **Table 4**).

## Localized Significance Thresholds

In addition to regional emissions and the CO hotspot analysis, the SCAQMD has developed a set of mass emissions rate look-up tables called localized significance thresholds (LSTs) that can be used to evaluate localized impacts that may result from construction and operational-period emissions. If the on-site emissions from proposed construction activities are below the emission levels found in the LST mass rate look-up tables for the project site receptor area (SRA), then emissions would not have the potential to cause a significant localized air quality impact. When quantifying mass emissions for LST analysis, only emissions that occur on site are considered. Consistent with SCAQMD LST guidance, emissions from offsite delivery hauling trucks, or employee trips are not considered in the evaluation of localized impacts.

The City of Pasadena lies within SCAQMD SRA 8 and the project site is approximately 0.74-acres. Therefore, **Table 4.3-2, Local Significance Thresholds – Pounds per Day**, shows the LST screening threshold for a 1-acre project site in SRA 8 with sensitive receptors located within 25 meters of the project site.

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**Table 4.3-2**  
**Local Significance Thresholds – Pounds per Day**

Phase	Nitrogen Oxide (NO <sub>x</sub> )	Carbon Monoxide (CO)	Coarse Particulate Matter (PM10)	Fine Particulate Matter (PM2.5)
<b>Construction</b>	69	535	4	3
<b>Operation</b>	69	535	1	1

Source:

SCAQMD. 2009. *Appendix C Mass Rate Look Up Table*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-1st-look-up-tables.pdf?sfvrsn=2>.

## **Toxic Air Contaminant Thresholds**

Certain groups of people are more affected by air pollution than others. The California Air Resources Board (CARB) has identified the following persons who are most likely to be affected by air pollution: children under 14, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. The closest sensitive receptors to the site are residences located adjacent to the Project. However, due to the limited scale and the short duration of construction, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Additionally, the proposed Project would not include any operational sources of TACs, and operational emissions were estimated to be far below significance thresholds. Therefore, the proposed Project would not expose sensitive receptors to a potential health risk during operation.

## **Methodology**

Air quality impacts were evaluated in accordance with the methodologies recommended by CARB and the SCAQMD. Where criteria air pollutant quantification was required, emissions modeled using the California Emissions Estimator Model version 2016.3.2 (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects.

## **Regional Construction Significance Analysis**

Construction associated with the proposed project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the project area include ozone-precursor

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pollutants (i.e., ROG and NOx), PM10, and PM2.5. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

Construction results in the temporary generation of emissions resulting from site grading and excavation, road paving, motor vehicle exhaust associated with construction equipment and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

The duration of construction activities associated with the proposed project is estimated to last approximately 28 months, beginning in 2022. Construction-generated emissions associated with the proposed project were calculated using the SCAQMD and CARB-approved California Emissions Estimator Model (CalEEMod) model. CalEEMod is designed to model construction and operational emissions for land use development projects. The model incorporates typical construction requirements such as construction equipment, demolition debris, and hauling trips. The CalEEMod model assumed that construction of the proposed project would include approximately 45,500 cubic yards of grading soil export and construction equipment was based on information provided by the project applicant, including the use of Tier 3 construction equipment. Predicted maximum daily construction-generated emissions for the proposed project are summarized in **Table 4.3-3, Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day**.

**Table 4.3-3**  
**Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day**

Construction Year	ROG	NOx	CO	SO2	PM10	PM2.5
2022	3.3	60.1	68.7	0.2	4.6	3.3
2023	1.3	20.3	26.7	0.1	2.2	1.5
2024	15.1	21.6	28.9	0.1	2.5	1.6
<b>Regional Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<i>Exceed?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Impact Sciences, CalEEMod modeling, 2020. See **Appendix A**.  
The emissions include measures within CalEEMod and as required by the SCAQMD through Rule 403. This includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hours. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. Consistent with CARB fleet requirements, construction equipment was assumed to meet minimum Tier 3 standards.

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During construction, the contractors are required to comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust), among others, which assist in reducing short-term construction-related air pollutant emissions. Rule 402 prohibits emissions that would cause a public nuisance and Rule 403 requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. As shown below, all criteria pollutant emissions would remain below their respective thresholds. The proposed project would be subject to Rules 402, 403, and 113, described in the Regulatory Framework subsection above. In addition, the project would utilize Tier 3 construction equipment (or better) which would reduce NO<sub>x</sub> and particulate matter.

## Regional Operational Significance Analysis

Project-generated emissions would be associated with motor vehicle use and area sources, such as the use of natural-gas-fired appliances, landscape maintenance equipment, and architectural coatings associated with the operation of an 84-unit apartment building with 6,200 square feet of retail space and 4 work/live units. Long-term operational emissions attributable to the proposed project are summarized in **Table 4.3-4, Long-Term Operational Emissions – Maximum Pounds per Day**.

As shown in **Table 4.3-2** and **Table 4.3-4**, neither the project's construction nor operational emissions would exceed the SCAQMD's thresholds for any criteria air pollutants. Therefore, regional construction and operation operational emissions would not result in a significant long-term regional air quality impact.

**Table 4.3-4  
Long-Term Operational Emissions – Maximum Pounds per Day**

Source	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source	24.2	1.8	49.7	0.11	6.5	6.46
Energy Use	0.03	0.24	0.10	.002	0.02	0.02
Mobile Source	1.23	5.3	15.5	0.06	5.4	1.49
Total	25.5	7.4	65.3	0.17	11.92	7.96
<b>Regional Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Exceed?	No	No	No	No	No	No

Source: Impact Sciences, CalEEMod modeling, 2020. See **Appendix B**.

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., background and cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individuals [e.g., age, gender]). In particular, O<sub>3</sub> precursors, VOCs, and NO<sub>x</sub> affect air quality on a regional scale. Health effects related to O<sub>3</sub>

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants would not have a measurable effect on the human health implications of the Basin's ambient air quality.

As noted in the Brief of Amicus Curiae by the SCAQMD (April 6, 2015) for the *Sierra Club vs. County of Fresno*, the SCAMQD acknowledged it would be extremely difficult, if not impossible to quantify health impact of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (April 13, 2015) for the *Sierra Club vs. County of Fresno*, SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

The SCAQMD acknowledges that quantifying the health impacts from O<sub>3</sub> is difficult. The health impacts an individual may face from O<sub>3</sub> depends on the ambient levels of O<sub>3</sub> that an individual person breathes. However, measuring changes in ambient levels of O<sub>3</sub> presents a challenge. SCAQMD's Brief of Amicus Curiae states that it would take a large amount of additional emissions to cause a modeled increase in ambient O<sub>3</sub> levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO<sub>x</sub> and a reduction of 187 tons (374,000 pounds) per day of VOC would reduce O<sub>3</sub> levels at the highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O<sub>3</sub>-related health impacts caused by NO<sub>x</sub> or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations. Thus, as the project would not exceed SCAQMD thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

a. *Conflict with or obstruct implementation of the applicable air quality plan?*

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**WHY?** The City of Pasadena is within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act (CCAA) requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source polluters; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The most recently adopted plan is the 2016 AQMP, adopted on March 3, 2017. This plan is the South Coast Air Basin's portion of the State Implementation Plan (SIP). This plan is designed to achieve the five percent annual reduction goal of the CCAA.

The SCAQMD understands that southern California is growing. As such, the AQMP accommodates population growth and transportation projections based on the predictions made by the Southern California Association of Governments (SCAG). Thus, projects that are consistent with employment and population forecasts are consistent with the AQMP.

The proposed project is consistent with the Zoning and General Plan Land Use designations for the site. As a result, the project is consistent with the growth expectations for the region. The proposed project is therefore consistent with the AQMP and would have no associated impacts.

- b. 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?*

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The SCAQMD's approach to assessing cumulative impacts is based on the 2016 AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the Clean Air Act (CAA) of 1970, and the CCAA. The SCAQMD neither recommends quantified analyses of cumulative construction or operational emissions, nor does it provide separate methodologies or thresholds of significance to be used to assess cumulative construction or operational impacts. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed using the same significance criteria as those for project-specific impacts. Therefore, individual development projects that generate construction-related or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulative considerable increase in emissions for those pollutants for which the Basin is nonattainment.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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As discussed in threshold question (a), the proposed project would be consistent with the 2016 AQMP, which is intended to bring the SCAB into attainment for all criteria pollutants. Furthermore, operational and construction emissions calculated for the proposed project do not exceed the applicable SCAQMD daily significance thresholds that are designed to assist the region in attaining the applicable ambient air quality standards (see **Table 4.3-3, Construction-Related Criteria Pollutant and Precursor Emissions** and **Table 4.3-4, Long-Term Operational Emissions**).

Additionally, with respect to the proposed project's construction-related air quality emissions and cumulative basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the 2016 AQMP pursuant to federal CAA mandates. As such, the proposed project would comply with SCAQMD Rule 403 requirements and with adopted 2016 AQMP emissions control measures. Per SCAQMD rules and mandates, these same requirements (i.e., Rule 403 compliance and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects throughout the SCAB, which would include related projects.

The proposed project would also not result in cumulative operational air quality impacts because emissions would not exceed the SCAQMD-adopted operational thresholds and the project's contribution is not a significant proportion of the cumulative total emissions. Cumulative projects would likewise be required to reduce their emissions per SCAQMD rules and mandates. The project's emissions would not considerably contribute to an exceedance of the National Ambient Air Quality Standards (NAAQS) or CAAQS and would, therefore, comply with the goals of the 2016 AQMP. Therefore, the project's contribution to regional pollutant concentrations would not be cumulatively considerable and cumulative impacts would not be significant.

*c. Expose sensitive receptors to substantial pollutant concentrations?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiovascular diseases.

Residential areas are considered to be sensitive receptors to air pollutions because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children are considered more susceptible to health effects of air pollution due to their immature immune systems and developing organs (OEHHA 2007). As such, schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation.

## Localized Significance Thresholds

### *Localized Construction Significance Analysis*

The nearest receptors to the project site are residents located adjacent to the north and east of the project site. In order to identify impacts to sensitive receptors, the SCAQMD recommends addressing Localized Significance Thresholds (LSTs) for construction.

LSTs were developed in response to SCAQMD Governing Boards’ Environmental Justice Enhancement Initiative (I-4). The SCAMQD provided the *Final Localized Significance Threshold Methodology* for guidance (SCAQMD 2008). The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific analysis.

The SRA for the LST is the West San Gabriel Valley area (SRA 8) since this area includes the project site. LSTs apply to CO, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The SCAMQD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. The project site is approximately 0.74-acres, therefore, the LST screening thresholds for one acre were utilized for the construction LST analysis.

The SCAQMD’s methodology clearly states that “off-site mobile emissions from the project should not be included in the emissions compared to LSTs.” Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod “on-site” emissions outputs were considered. The nearest sensitive receptors to the project site are the residents adjacent to the north and east. LST screening thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. According to SCAQMD methodology, “It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.” Therefore, LSTs for receptors located at 25 meters were utilized in this analysis.

**Table 4.3-5, Localized Significance of Construction Emissions – Maximum Pounds per Day**, presents the results of the localized emissions during construction activity of the proposed project. As shown in **Table 4.3-5**, the on-site air pollutant emissions on the peak day of construction would not exceed the applicable LST screening thresholds. Therefore, impacts would be less than significant.

**Potentially Significant Impact**      **Significant Unless Mitigation is Incorporated**      **Less Than Significant Impact**      **No Impact**

**Table 4.3-5  
Localized Significance of Construction Emissions – Maximum Pounds per Day**

Construction Year	NOx	CO	PM10	PM2.5
2022	31.02	38.49	1.44	1.42
2023	18.48	23.20	0.95	0.95
2024	18.47	23.20	0.95	0.95
<b>LST Screening Threshold</b>	<b>69</b>	<b>535</b>	<b>4</b>	<b>3</b>
<b>Exceed?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

### ***Localized Operational Significance Analysis***

According to the SCAQMD LST methodology, LSTs would apply to operational phase of a proposed project only if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The project is proposing a mixed-use residential and commercial development and, therefore, does not include such land uses. Thus, due to the lack of queuing and idling emissions, no long-term localized significance threshold analysis is needed. Operational LST impacts would be less than significant in this regard.

### ***Localized Air Quality Health Impacts***

As evaluated above, the project's air emissions would not exceed the SCAQMD's LST thresholds. Therefore, the project would not cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS for emissions of CO, NOx, PM10, or PM2.5. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons are protected. In other words, the ambient air quality standards are purposely set in a stringent manner to protect children, the elderly, and those with existing respiratory problems. Thus, air quality health impacts would be less than significant in this regard.

### ***Carbon Monoxide Hotspots***

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near congested roadways or intersections may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The SCAB is designated as an attainment/maintenance area for the federal CO standards and an attainment area for state standards. There has been a decline in CO emissions even though vehicle miles

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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traveled (VMT) on U.S. urban and rural roads have increased nationwide; estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions (EPA 2018). Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burner fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD CEQA Air Quality Handbook, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 ppm, the CAAQS for 8-hour ozone. The SCAQMD prepared a detailed CO analysis in the *Federal Attainment Plan for Carbon Monoxide* as part of the 2003 AQMP. The 2003 AQMP is the most recent AQMP that addresses CO concentrations. The CO analysis included microscale modeling of CO at the worst-case intersections in SCAB. Of these locations, the Wilshire Boulevard and Veteran Avenue intersection in Los Angeles experienced the highest CO concentration of 4.6 ppm. At the time of analysis, the Wilshire Boulevard and Veteran Avenue intersection was the most congested intersection in Los Angeles County with an average daily traffic volume of approximately 100,000 vehicles per day. As CO impacts at the Wilshire Boulevard and Veteran Avenue intersection did not exceed the 8-hour CAAQS, it can be inferred that the intersections near the project site would not create any CO hotspots. Furthermore, as previously discussed, the site is located in SRA 8, West San Gabriel Valley. Communities within SRAs are expected to have similar climatology and ambient air pollutant concentrations. The monitoring station representative of SRA 8 is the Pasadena-South Wilson Avenue air quality monitoring station located approximately 1.5 miles southeast of the site. According to data obtained from the EPA's AirData database for CO pollutants, the highest eight-hour concentration reported for the Pasadena station in 2018 was 1.4 ppm. As such, the background CO concentration in combination with the CO concentration at worst-case scenario intersection in SCAB do not exceed 9.0 ppm and a CO hotspot would not occur. Therefore, CO hotspot impacts would be less than significant in this regard.

### ***Diesel Particulate Matter***

Construction would result in the generation of diesel particulate matter (diesel PM) emissions from the use of off-road diesel equipment required for grading and excavation, paving, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current methodology for conducting health risk assessments are associated with long term exposure periods (9, 30, and 70 years). Therefore, short-term construction activities would not generate a significant health risk.

Additionally, the project site is approximately 0.74-acres and, as a result, construction activities would occur in an area of less than 5 acres. CARB generally considers construction projects contained in a site of such size to represent less than significant health risk impacts due to limitations of the off-road diesel equipment able to operate and thus a reduced amount of generated diesel particulate matter (DPM), the reduced amount of dust-generating ground-disturbance possible compared to larger construction sites, and the reduced duration of construction activities compared to the development of larger sites. Furthermore, construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5 minutes, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the project would have a less than significant impact.

*d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)*

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**WHY?** The SCAQMD *CEQA Air Quality Handbook* (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The proposed project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. The project would also be required to comply with the SCAQMD Rule 1113 – Architectural Coating, which would minimize odor impacts from ROG emissions during architectural coating. Any odor impacts to existing adjacent land uses would be short-term and not substantial. As such, the project would not result in other

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant in this regard.

#### 4.4 BIOLOGICAL RESOURCES

Would the project:

- a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

☐ ☐ ☐ ☒

**WHY?** The project is in a developed urban area. There are no known unique, rare or endangered plant or animal species or habitats on or near the site.

- b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

☐ ☐ ☐ ☒

**WHY?** There are no designated natural communities in the City. The Final EIR for the 2015 Land Use and Mobility Elements contains the best available City-wide documented biological resources. This EIR identifies the natural habitat areas within the City's boundaries to be the upper and lower portions of the Arroyo Seco, the City's western hillside area, and Eaton Canyon. The project is not located near any of these natural habitat areas. The project is located in a developed urban area. The only vegetation present onsite is ornamental landscaping. The project site and surrounding area do not include any vegetation that constitutes a plant community.

- c. *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

☐ ☐ ☐ ☒

**WHY?** Drainage courses with definable bed and bank and their adjacent wetlands are "waters of the United States" and fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the Clean Water Act. Jurisdictional wetlands, as defined by the USACE are lands that, during normal conditions, possess hydric soils, are dominated by wetland vegetation, and are inundated with water for a portion of the growing season.

The project is located in a developed urban area. There is no naturally occurring wetland habitat. The project site does not include any discernable drainage courses, inundated areas, wetland vegetation, or

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act.

- 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?*

☐ ☐ ☒ ☐

**WHY?** The project is located in a developed urban area and does not involve the dispersal of wildlife nor would the project result in a barrier to migration or movement. However, the project includes the removal of trees that have the potential to be nesting sites for birds. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The proposed project would comply with all applicable regulation of the MBTA. Therefore, project impacts to wildlife movement would be less than significant.

- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

☐ ☐ ☒ ☐

**WHY?** The City of Pasadena Ordinance No. 6896 "City Trees and Tree Protection Ordinance" is in place to:

- A. Preserve and grow Pasadena's canopy cover by protecting landmark, native and specimen trees on specified areas of private property and expanding the protection of street trees and trees on public property.
- B. Safeguard the City's urban forest by providing for the regulation of the protection, planting, maintenance and removal of trees in the city.
- C. Protect the visual and aesthetic character of the city.
- D. Improve and enhance property values by conserving and adding to the distinctive and unique aesthetic character of the many areas of Pasadena.
- E. Improve the quality of life for residents, visitors and wildlife.



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- F. Create favorable conditions for the protection of designated landmark, native and specimen trees, for the benefit of current and future residents of Pasadena.
- G. Maintain and enhance the general health, safety and welfare of the city and its residents by assisting in counteracting air pollution and in minimizing soil erosion and other related environmental damage.
- H. Protect and maintain healthy trees in the land use planning processes as set forth herein.
- I. Establish procedures and practices for fulfilling the purposes of this city tree and tree protection ordinance.

A tree survey was completed in July 2017 by Carlberg Associates to identify the existing on-site trees, evaluate the size and condition of each tree, and note whether or not the tree could remain in place, be relocated, or would need to be removed entirely.

As listed below in **Table 4.4-1, Summary of On-Site Protected Trees**, and shown on **Figure 4.4-1, Existing On-Site Tree Locations**, the Project Site contains 31 trees. Seven of the trees onsite and all of the adjacent street trees, a total of 15 trees, were noted as being protected under Ordinance 6896. As detailed in **Table 4.4-1**, the seven on-site protected trees consisted of two California fan palms, one Canary Island date palm, three Camphor trees, and one Indian laurel fig tree. Subsequent to the 2017 tree survey, Tree #24, a protected Indian laurel fig (*Ficus microcarpa*), failed from the root plate during one of the rain storms in January 2018 and was subsequently removed. Based on the prior documented presence of fungal fruiting bodies and the nature of the failure, this tree failure appears to have occurred due to storm-related pressure on a significantly compromised root structure. These are natural causes and not related to any project-related activity.

**Table 4.4-1**  
**Summary of On-Site Protected Trees**

Tree ID #	Botanical Name	Common Name	DBH / BTH <sup>1</sup>	Height	Health & Structure Grades	Disposition	Protected?
ST1	<i>Lagerstroemia indica</i>	Crape myrtle	3"	20	B B	Retain	Yes
ST2	<i>Lagerstroemia indica</i>	Crape myrtle	3"	15	A A	Retain	Yes
ST3	<i>Lagerstroemia indica</i>	Crape myrtle	2"	13	A- B	Retain	Yes
ST4	<i>Lagerstroemia indica</i>	Crape myrtle	1"	10	F F	Retain	Yes

		Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact		
Tree ID #	Botanical Name	Common Name	DBH / BTH <sup>1</sup>	Height	Health & Structure Grades	Disposition	Protected?
ST5	<i>Lagerstroemia indica</i>	Crape myrtle	1"	10	B B	Retain	Yes
ST6	<i>Lagerstroemia indica</i>	Crape myrtle	stump sprouts	4	A- C	Retain	Yes
ST7	<i>Syagrus romanzoffiana</i>	Queen palm	20'	30	A A	Relocate	Yes
ST8	<i>Syagrus romanzoffiana</i>	Queen palm	15'	20	A B	Retain	Yes
12	<i>Ailanthus altissima</i>	Tree of Heaven	8.5"	30	A B	Remove	No
13	<i>Washingtonia robusta</i>	Mexican fan palm	50'	58	A A	Remove	No
14	<i>Washingtonia robusta</i>	Mexican fan palm	65'	73	A A	Remove	No
15	<i>Pinus canariensis</i>	Canary Island pine	21"	80	B B	Remove	No
16	<i>Pinus canariensis</i>	Canary Island pine	18.5"	75	A B-	Remove	No
17	<i>Washingtonia robusta</i>	Mexican fan palm	42'	50	A A	Remove	No
18	<i>Cinnamomum camphora</i>	Camphor tree	19, 21,31"	45	B C	Remove	Yes
19	<i>Cinnamomum camphora</i>	Camphor tree	16,16.5"	45	B B	Remove	Yes
20	<i>Cinnamomum camphora</i>	Camphor tree	18.5, 23.5"	45	B B	Remove	Yes
21	<i>Ulmus parvifolia</i>	Chinese elm	15"	25	B C	Remove	No
22	<i>Washingtonia robusta</i>	Mexican fan palm	50'	57	A A-	Remove	No
23	<i>Washingtonia filifera</i>	California fan palm	45'	55	A A-	Relocate	Yes
24	<i>Ficus microcarpa</i> <sup>1</sup>	Indian laurel fig	40.5"	45	B C	Failed <sup>1</sup>	Yes
25	<i>Washingtonia robusta</i>	Mexican fan palm	50'	58	A A-	Remove	No
26	<i>Phoenix canariensis</i>	Canary Island date palm	50'	58	A A	Relocate	Yes
27	<i>Washingtonia robusta</i>	Mexican fan palm	55'	62	A A	Remove	No
28	<i>Washingtonia robusta</i>	Mexican fan palm	55'	62	A A	Remove	No
29	<i>Washingtonia robusta</i>	Mexican fan palm	60'	68	A	Remove	No

		Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact		
Tree ID #	Botanical Name	Common Name	DBH / BTH <sup>1</sup>	Height	Health & Structure Grades	Disposition	Protected?
					A		
30	<i>Magnolia grandiflora</i>	Southern magnolia	15"	30	B B	Remove	No
31	<i>Washingtonia filifera</i>	California fan palm	50'	60	A B	<b>Relocate</b>	<b>Yes</b>

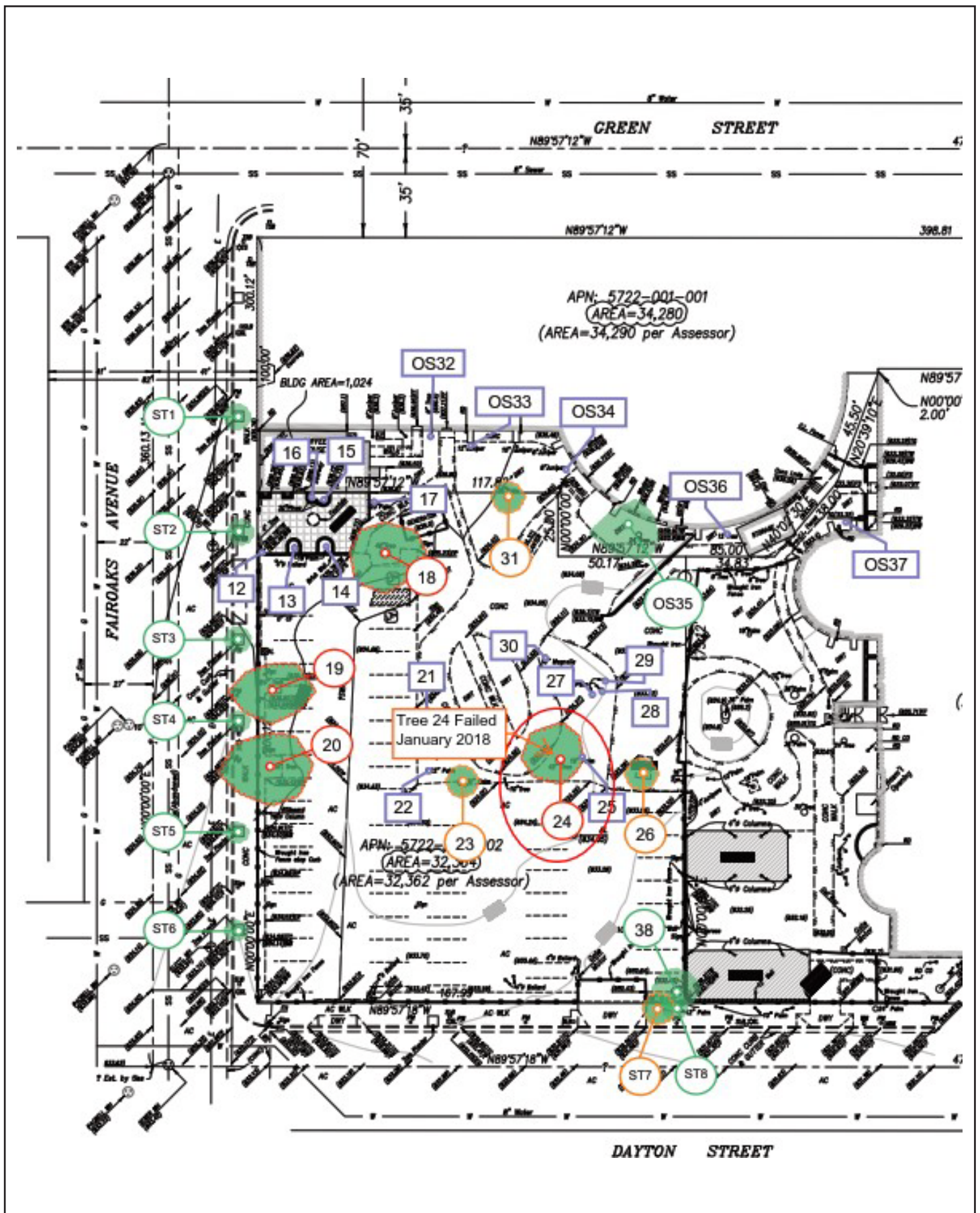
DBH = diameter at breast height      BTH = brown trunk height

1 – Tree #24 failed in January 2019 and is no longer on-site

Source: Carlberg Associates, Horticulturalists and Registered Consulting Arborists, July 10, 2017

Applications for Private Tree Removal and a landscape plan for the proposed project are required to be prepared and submitted for approval by the Design Commission in conjunction with the design review process. The applications for Private Tree Removal will be required to provide information and documentation to substantiate one or more of the findings for removal of protected trees listed in PMC Section 8.52.075(A). In addition, for any trees that are permitted to be removed using Tree Protection Ordinance finding #6, the required landscape plan will be required to demonstrate the minimum replacement ratio noted in the adopted Tree Replacement Matrix for the existing, protected trees and meet the requirements of the City of Pasadena City Trees and Tree Protection Ordinance No. 6896. Further, removal of any tree in the public right-of-way requires review by the Urban Forestry Advisory Committee and approval by the City Manager (none are proposed to be removed) and the planting of any tree in the public right-of-way requires approval of the staff of the Department of Public Works.

Following the implementation of the City's standard policies and procedures described above, impacts would be less than significant, and no further analysis is required.



SOURCE: Carlberg Associates, Horticulturalists and Registered Consulting Arborists, December 2019

FIGURE 4.4-1

Existing On-Site Tree Locations

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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- f. *Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** Currently, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena. There are also no approved local, regional or state habitat conservation plans.

#### 4.5 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?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The following analysis is based on the *86 Fair Oaks Avenue Historic Resources Technical Report* (Historic Resources Report), prepared by Historic Resources Group, dated September 2020, incorporated herein by reference and included as **Appendix E** to this SCEA.

#### EXISTING CONDITIONS

The Project Site is located within the Old Pasadena Historic District which is listed in the National Register of Historic Places (1983; revised 2008). In addition, the Project Site is located within the boundary of the Hotel Green/Castle Green property, which was listed individually in the National Register of Historic Places in 1982. By virtue of being listed in the National Register, both the Old Pasadena Historic District and the Hotel Green/Castle Green property are also listed in the California Register of Historical Resources. At the local level in the City of Pasadena, the Hotel Green/Castle Green was designated as a Historic Monument in 1997.<sup>1</sup>

The boundaries of the Hotel Green/Castle Green as defined in the original National Register registration form are: "The square block bounded by Raymond Avenue on the east, Green Street on the north, Fair Oaks [A]venue on the west and Dayton Street on the south."<sup>2</sup> Thus, the entire block, which includes the Project Site, is listed as a historic property in the National Register and California Register.

<sup>1</sup> When the Hotel Green/Castle Green was designated locally in 1997 it was as a Historic Treasure. The Pasadena Municipal Code was subsequently modified in 2005 and all Historic Treasure designations became Historic Monuments.

<sup>2</sup> "Hotel Green" National Register of Historic Places Inventory – Nomination Form, 1982.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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Across Dayton Street to the south is Central Park, a 9.2-acre park which is also a contributing resource to the Old Pasadena Historic District. Across Fair Oaks Avenue to the west are three- to four-story mixed-use buildings and parking lots, and across Raymond Avenue to the east are one- and two-story commercial buildings. A more detailed description of adjacent structures that are contributing and non-contributing to the Old Pasadena Historic District is provided in the Historic Resources Report (**Appendix E**).

## REGULATORY REVIEW

### Historic Resources under CEQA

In accordance with Section 15064.5(b) of the *CEQA Guidelines*, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A “substantial adverse change” means “physical demolition, destruction, relocation, or alteration...such that the significance of an historical resource would be materially impaired.”<sup>3</sup>

Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency’s determination is supported by substantial evidence in light of the whole record.

The courts have interpreted CEQA to create three categories of historical resources:

- *Mandatory historical resources* are resources “listed in, or determined to be eligible for listing in, the California Register of Historical Resources.”
- *Presumptive historical resources* are resources “included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in

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<sup>3</sup> *State CEQA Guidelines*, Section 15064.5(b)(1).

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subdivision (g) of Section 5024.1” of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.

- *Discretionary historical resources* are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.<sup>4</sup>

## Historic Designations

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

### ***National Register of Historic Places***

The National Register of Historic Places is an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.<sup>5</sup> The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

<sup>4</sup> *League for the Protection of Oakland's Architectural and Historic Resources vs. City of Oakland*, 52 Cal. App. 4<sup>th</sup> 896, 906-7 (1997).

<sup>5</sup> 36CFR60, Section 60.2.

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The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.<sup>6</sup>

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of *location, design, setting, materials, workmanship, feeling, and association*.

## Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic *districts*. The National Park Service defines a historic district as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”<sup>7</sup> A historic district derives its significance as a single unified entity.

According to the National Park Service, “a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.” Some examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas and rural villages.<sup>8</sup>

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<sup>6</sup> 36CFR60, Section 60.3.

<sup>7</sup> National Register Bulletin 15. How to Apply the National Register Criteria for Evaluation. Washington D.C.: National Park Service, U. S. Department of the Interior, 1997.

<sup>8</sup> Ibid.



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Resources that have been found to contribute to the historic identity of a district are referred to as *district contributors*. Properties located within the district boundaries that do not contribute to its significance are identified as *non-contributors*.

### ***California Register of Historical Resources***

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.<sup>9</sup>

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register includes the following:

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).

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<sup>9</sup> California PRC, Section 5023.1(a).

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.<sup>10</sup>

Other resources which may be nominated for listing in the California Register include:

- Individual historical resources.
- Historic resources contributing to the significance of an historic district.
- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in subdivision (g).
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.<sup>11</sup>

### ***Local Designation Programs***

The City of Pasadena has established an historic preservation program in order to promote “the identification, evaluation, rehabilitation, adaptive use, and restoration of historic structures.” The criteria for the designation of historic monuments, landmarks, historic signs, landmark trees, or landmark districts are applied “according to applicable National Register of Historic Places Bulletins for evaluating historic properties.” These criteria are excerpted below from Section 17.62.40 of the Pasadena Zoning Code.<sup>12</sup>

#### **Historic Monuments**

A historic monument shall include all historic resources previously designated as historic treasures before adoption of Pasadena Zoning Code Section 17.62.040 - Criteria for Designation of Historic Resources in 2005 (Criteria), historic resources that are listed in the National Register at the State-wide or Federal level

<sup>10</sup> California PRC, Section 5023.1(d).

<sup>11</sup> California PRC, Section 5023.1(e).

<sup>12</sup> City of Pasadena Online Zoning Code Title 17. 17.62.040 - Criteria for Designation of Historic Resources  
[https://library.municode.com/ca/pasadena/codes/code\\_of\\_ordinances?nodeId=TIT17\\_ZONING\\_CODE\\_ART6LAUSDEPEPR\\_CH17.62HIPR\\_17.62.040CRDEHIRE](https://library.municode.com/ca/pasadena/codes/code_of_ordinances?nodeId=TIT17_ZONING_CODE_ART6LAUSDEPEPR_CH17.62HIPR_17.62.040CRDEHIRE).

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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of significance (including National Historic Landmarks) and any historic resource that is significant at a regional, State, or Federal level, and is an exemplary representation of a particular type of historic resource and meets one or more of the following criteria:

- a) It is associated with events that have made a significant contribution to the broad patterns of the history of the region, State, or nation.
- b) It is associated with the lives of persons who are significant in the history of the region, State, or nation.
- c) It is exceptional in the embodiment of the distinctive characteristics of a historic resource property type, period, architectural style, or method of construction, or that is an exceptional representation of the work of an architect, designer, engineer, or builder whose work is significant to the region, State, or nation, or that possesses high artistic values that are of regional, State-wide or national significance.
- d) It has yielded, or may be likely to yield, information important in prehistory or history of the region, State, or nation.

A historic monument designation may include significant public or semi-public interior spaces and features.

## Landmarks

A landmark shall include all properties previously designated a landmark before adoption of the Criteria and any historic resource that is of a local level of significance and meets one or more of the criteria listed below.

A landmark may be the best representation in the City of a type of historic resource or it may be one of several historic resources in the City that have common architectural attributes that represent a particular type of historic resource. A landmark shall meet one or more of the following criteria:

- a) It is associated with events that have made a significant contribution to the broad patterns of the history of the City, region, or State.
- b) It is associated with the lives of persons who are significant in the history of the City, region, or State.
- c) It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the City or, to the region or possesses artistic values of significance to the City or to the region.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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- d) It has yielded, or may be likely to yield, information important locally in prehistory or history.

### **Historic Signs**

A historic sign shall include all signs in the sign inventory as of the date of adoption of this Zoning Code and any sign subsequently designated historically significant by the Historic Preservation Commission that possesses high artistic values. A historic sign shall meet one or more of the following criteria:

- a) The sign is exemplary of technology, craftsmanship or design of the period when it was constructed, uses historic sign materials and means of illumination, and is not significantly altered from its historic period. Historic sign materials shall include metal or wood facings, or paint directly on the façade of a building. Historic means of illumination shall include incandescent light fixtures or neon tubing on the exterior of the sign. If the sign has been altered, it must be restorable to its historic function and appearance.
- b) The sign is integrated with the architecture of the building.
- c) A sign not meeting criteria a or b above may be considered for inclusion in the inventory if it demonstrates extraordinary aesthetic quality, creativity, or innovation.

All other regulations relating to signs shall comply with Chapter 17.48 (Signs).

### **Landmark Trees**

A tree shall qualify to be of historic or cultural significance and of importance to the community if it meets any one of the following criteria:

1. It is one of the largest or oldest trees of the species located in the City;
2. It has historical significance due to an association with a historic event, person, site, street, or structure;  
or
3. It is a defining landmark or significant outstanding feature of a neighborhood.

### **Landmark Districts**

A landmark district shall include all landmark districts previously designated before adoption of the Criteria and any grouping of contiguous properties that also meet the following criteria:

- a) Within its boundaries, a minimum of 60 percent of the properties qualify as contributing; and

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- b) The grouping represents a significant and distinguishable entity of Citywide importance and one or more of a defined historic, cultural, development and/or architectural context(s) (e.g., 1991 Citywide historic context, as amended, historic context prepared in an intensive-level survey or historic context prepared specifically for the nominated landmark district).

When considering applications to designate a landmark district, the Historic Preservation Commission shall use the National Register of Historic Places Bulletin #21: “Defining Boundaries for National Register Properties”.

### ***Central District Specific Plan***

Development in central Pasadena is governed by the Central District Specific Plan which contains detailed development standards, distribution of land uses, infrastructure requirements, and implementation measures. Area Specific Plans are designed to implement the goals and policies of the City’s General Plan.

The Central District Specific Plan divides the area into several sub-districts. The Project Site is located within the Old Pasadena Sub-district. The objective of the Old Pasadena Sub-district is to protect the numerous historic resources in the area, and to support the long term viability of its core as a regional retail and entertainment destination through the development of nearby complementary uses, including urban housing near light rail stations and parks.<sup>13</sup> The Central District Specific Plan Area is shown in **Figure 2.0-9**.

### ***Historic Significance and Integrity***

#### **Significance**

The definition of historic significance used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register:

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation.<sup>14</sup> It is achieved in several ways:

- Association with important events, activities or patterns

<sup>13</sup> Central District Specific Plan, Section 7.

<sup>14</sup> *National Register Bulletin 16A. How to Complete the National Register Registration Form*. Washington D.C.: National Park Service, U.S. Department of the Interior, 1997, p. 3.

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- Association with important persons
- Distinctive physical characteristics of design, construction, or form
- Potential to yield important information

A property may be significant individually or as part of a grouping of properties.

## Historic Integrity

*Historic integrity* is the ability of a property to convey its significance and is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”<sup>15</sup> The National Park Service defines seven aspects of integrity: *location*, *design*, *setting*, *materials*, *workmanship*, *feeling*, and *association*. These qualities are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event took place.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property’s expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.<sup>16</sup>

## IDENTIFICATION OF HISTORICAL RESOURCES

Resources located both within and immediately outside the Project Site are examined in the following analysis for the purposes of identifying potential historical resources. The context of their previous evaluations, criteria for significance and integrity issues are explored.

<sup>15</sup> Ibid., p. 3.

<sup>16</sup> *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: National Park Service, U.S. Department of Interior, 1995.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The Project Site is located within the boundary of the Old Pasadena Historic District (refer to **Figure 4.5-1, Old Pasadena Historic District Map**) and on the site of one individual resource, the Hotel Green/Castle Green, as identified in the nomination form for individual listing in the National Register of Historic Places.<sup>17</sup>

No additional historical resources, besides those listed as contributors to the Old Pasadena Historic District, were identified in the Project Site vicinity.

## Site Development History

The Project Site is within the boundary of the Hotel Green/Castle Green property, as identified in the nomination form for individual listing in the National Register of Historic Places.<sup>18</sup> The Project Site occupies the southwest parcel of the block that contained the western annex of the Hotel Green. The Project Site was never developed with the typical commercial blocks that were constructed in Old Pasadena at the turn of the twentieth century, and it has been surface parking and/or recreation space for much of its history.

The 1887 Sanborn map shows a one-story retail grocery store on the site facing Fair Oaks Avenue. By 1888, it was no longer on the site and the site appears vacant until 1903 when a one-story bungalow appears on the parcel facing Vineyard Street (later Dayton Street). This house was built by Colonel George G. Green (owner of the Hotel Green) for his daughter Lotta.<sup>19</sup>

The Hotel Green/Castle Green was originally developed as a luxury resort hotel. By the late 19<sup>th</sup> century, Pasadena had become a popular destination for well-to-do patrons escaping the severe winter weather of the mid-west and eastern seaboard; the Hotel Green/Castle Green was one of several major resort hotels constructed in the area. Located just north of The Atchison, Topeka, and Santa Fe railroad station on South Raymond Avenue, the Hotel Green/Castle Green occupied a prime location in central Pasadena.

The Hotel Green/Castle Green complex was built in four phases with each phase represented by a separate building or wing. A fifth wing, intended to be constructed on the current Project site was never constructed. The first building of the Hotel Green was constructed in 1887 by developer Edward C. Webster and originally referred to as the “Hotel Webster.” It was located on the east side of Raymond Avenue at the southeast corner of Raymond Avenue and Green Street. Webster overextended himself financially and was forced into insolvency before his hotel was completed. Colonel George G. Green purchased the property in 1891.

<sup>17</sup> The Hotel Green/Castle Green are also identified as contributors to the Old Pasadena Historic District; the District is discussed in further detail in the next section.

<sup>18</sup> The Hotel Green/Castle Green are also identified as contributors to the Old Pasadena Historic District; the District is discussed in further detail in the next section.

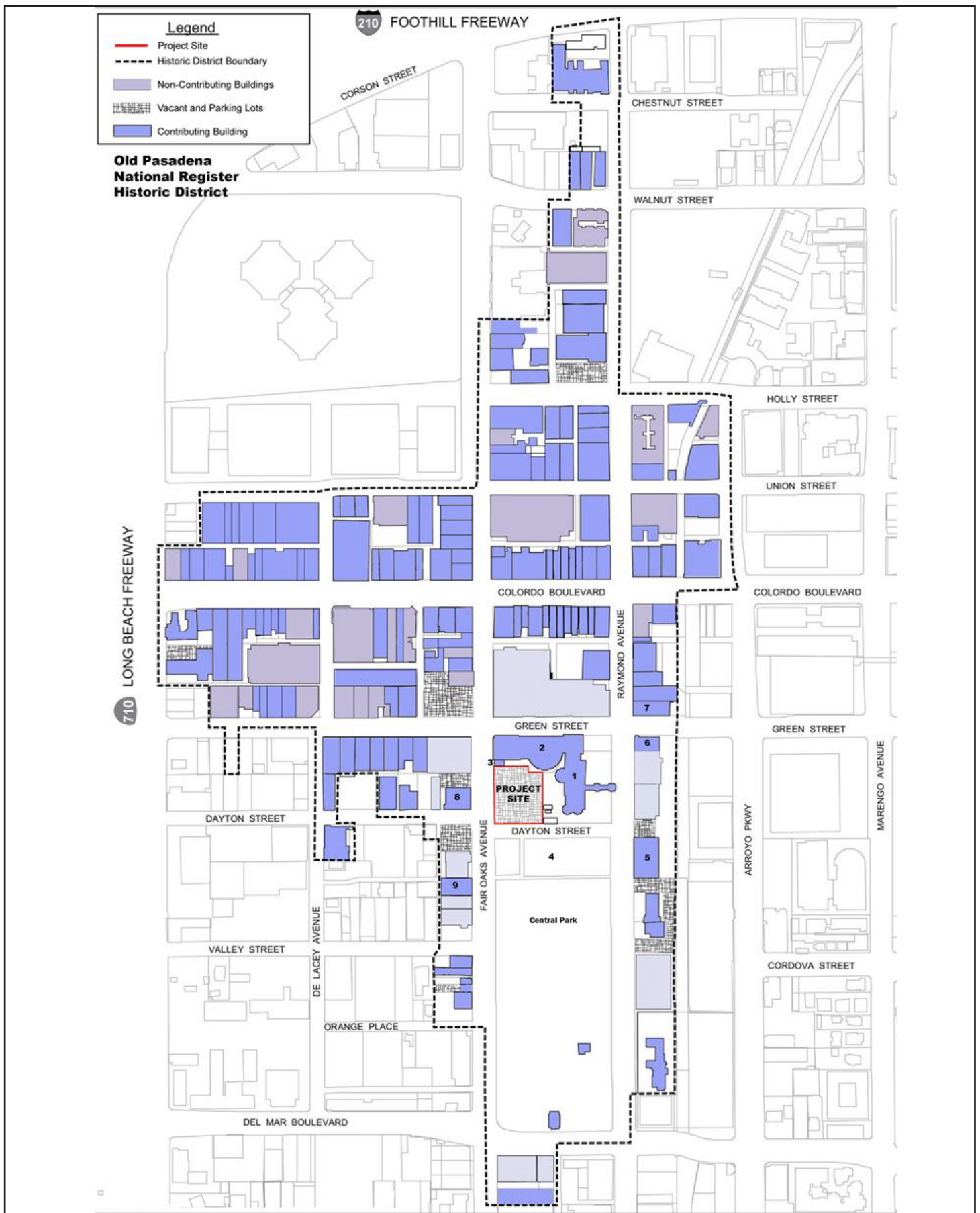
<sup>19</sup> “Hotel Green Bungalow” drawing archived at Pasadena Museum of History Research Library and Archives.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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In 1894 he constructed an addition on the north end of the former “Hotel Webster” that continued along the remaining length of Raymond Avenue to Green Street. The hotel was re-named “Hotel Green.”

The hotel was successful, and plans were soon developed for an expansion of the hotel on the west side of Raymond Avenue. The expansion of the Hotel Green onto the block west of Raymond Avenue began in the late 1890s. From accounts in the *Los Angeles Times* in 1901, it appears Colonel Green had purchased the remaining parcels of the block, including a building at the southeast corner of Fair Oaks Avenue and Green Street which was built in 1887 and was known as the Wooster Block, with plans for expansion onto the western portion.





SOURCE: Historic Resources Group, September 2018

FIGURE 4.5-1

*"Now that Col. G.G. Green has acquired the Wooster Block and other property on Fair Oaks avenue, making him the owner of the entire frontage on that avenue from Green to Vineyard street, he will begin at once the long-contemplated additions to Hotel Green. Manager Holmes says the plan is to add another story to the Wooster Block, to be used as the main dining room of the hotel, and south of this building to erect another structure which shall be in conformity with the present west annex of the large hotel. The main entrance is to be on Green Street. Parts of the lot not occupied by buildings will be laid out in parks and flower beds. It is hoped to have the work done on the opening of next season."*<sup>20</sup>

The expansion of the Hotel Green onto the block west of Raymond Avenue began in the late 1890s. The "West Annex" (today's Castle Green) was designed by architect Frederick Louis Roehrig and opened in January of 1899. Construction of the West Annex represented the third phase of development for the complex. The West Annex was connected to the original Hotel Green building by way of an enclosed bridge over Raymond Avenue, which remained until 1929; a portion of it survives today from the east facade of the Castle Green to the Raymond Avenue sidewalk.

In the early 1900's, further expansion plans were developed to extend the hotel along Green Street to connect to the existing Wooster Block building and along Fair Oaks Avenue. The Fair Oaks Avenue façade of the planned expansion was described by the *Pasadena Evening Star* in 1902 as having ground floor shops with a long balcony above.

*"The ground floors on South Fair Oaks avenue, with the exception of the Fair Oaks entrance, which will be in and about the center of the block, will be divided into stores and rented to persons who conduct businesses that would in their nature attract tourists and the class of persons who patronize a hotel of the character of the Green.*

*For the width of sixteen feet, more or less, as the working out of the plans may determine, there will be a long balcony ranging along the tops of the portions of these stores to Vineyard street, and overlooking South Fair Oaks avenue. The designs for this balcony will be exquisite, and it is intended that it shall be one of the most beautiful as well as one of the longest balconies of solid masonry in the world. Above this will rise the other five stories of the great west wing of the new hotel."*<sup>21</sup>

<sup>20</sup> "Hotel Green Additions," *Los Angeles Times*, May 8, 1901.

<sup>21</sup> "A Greater Hotel Green," *Pasadena Evening Star*, February 11, 1902.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The *Pasadena Daily News* added further detail in January of 1903.

*“For weeks Col. Green and Architect F.L.O. Roehrig have been working out plans and designs for the addition which is to cost more than a half million dollars. ...*

*The new building will face north on Green street and west on Fair Oaks avenue. It will be of the Moorish and Colonial style mingled. The building will be six stories high. ...*

*The Wooster Block so substantially built will be wholly remodeled to conform with the new structure and will be the corner section of the two mighty wings. The lower floor facing Fair Oaks avenue from Green street to Vineyard street across the whole block as owned by Col Green will be divided into store rooms fitted up with modern style for rent. These store rooms will be very deep and light.*

*From Green street the guests will enter an elaborate lobby just north of the present Annex.*

*The open space between the Annex and the new addition will contain a great court, where guests will promenade and while away the evenings amid a semi-tropic foliage covered with glass and brilliantly lighted. South of this the two wings open out on Central Park, of 9.2 acres, recently acquired by Pasadena, and which is to be immediately planted in accordance with the most advanced ideas of the landscape gardener.”<sup>22</sup>*

The proposed design would have created a U-shaped building with a landscaped central courtyard with greenhouse and connecting arcade along Dayton Street. A portion of the announced expansion was completed in 1903 with construction of the “North Annex” along Green Street, incorporating the existing Wooster Block. Construction of the North Annex represents the fourth phase of development for complex. The proposed fifth wing fronting Fair Oaks Avenue, the arcade and greenhouse, all of which would have occupied the site of the currently proposed project, were never built.

It appears the southwest parcel (the Project Site) was then landscaped and used for recreation by hotel guests.<sup>23</sup> The landscaping, which consisted of trees, shrubs and winding paths, complemented the Hotel Green Park (1894) which was on the eastern portion of the block prior to the Hotel Green expansion west of Raymond Avenue. The park became the front yard of the hotel in 1898 and is still evident today in front of the Castle Green. Central Park, just south of the hotel, was similarly designed in 1903 and became a seamless continuum of landscaping and a recreation ground for the tourists staying at the neighboring Hotel

<sup>22</sup> “Greater Hotel Green,” *Pasadena Daily News*, January 1, 1903.

<sup>23</sup> The parcel was labeled as “park” on the 1903 Sanborn Map.

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Green. The front yard of the Castle Green is now fenced with a locked gate, whereas Central Park is open to the public.

The decline of the Hotel Green led to the break-up of the hotel property beginning in 1920. The eastern portion (east side of Raymond Avenue) was sold in 1920 and became the Hotel Pasadena. The L-shaped western portion was split, and the West Annex became the Castle Green Apartments in 1924. The North Annex remained the last vestige of the Hotel Green until the early 1970s when the Hotel was converted into low-income senior apartments.

Circa 1914, a tennis court was added to the southwest parcel. The previously described bungalow was removed at some point between 1931 and 1951.<sup>24</sup> The 1951 Sanborn map shows the parcel as being used for auto parking. A swimming pool was added in the south gardens near the outdoor dining terrace of the Hotel Green in 1953.<sup>25</sup> It was infilled and paved over in the early 1970s when the Hotel was converted into low-income senior apartments. The oval shape is still present on the site and is currently covered with grass and a shuffleboard court. The 1982 National Register nomination form characterized the area created by the junction of the two buildings as having "...parking lots, garages, and other service facilities."<sup>26</sup>

Currently, there are 31 mature trees on the Project Site and it appears a few of the trees may date to the early Hotel era when it was initially landscaped as they match locations identified in a photograph from ca. 1903 (refer to **Section 4.4, Biological Resources**). Additionally, according to the arborist's Tree Aging report completed by Jan C. Scow Consulting Arborists, LLC, on June 3, 2013, two trees are 100 years old or older and are conceivably remnants from the early landscape scheme. The next oldest trees identified, four from the late 1920s and early 1930s, post-date the planned landscape of the early Hotel era.<sup>27</sup> It should be noted that Tree #24, a protected Indian laurel fig (*Ficus microcarpa*), failed from the root plate during one of the rain storms in January 2018.

The site is currently used as a surface parking lot with asphaltic concrete paving. The paving creates a U-shape in plan around a landscaped area with picnic tables, benches and a shuffleboard court marked by a hedge. This recreational area appears to have been developed in the 1950s when the pool was installed.

<sup>24</sup> Sanborn maps for Pasadena. The bungalow appears on the 1903, 1910 and the 1931 maps, but not on the 1951 map.

<sup>25</sup> William W. Ellinger III, AIA "Chronology for the Hotel Green (1887-1973), the Castle Green Apartments (1924-), the Hotel Green Apartments (1973-), and Related Events of Interest," August 1993.

<sup>26</sup> "Hotel Green" National Register of Historic Places Inventory – Nomination Form, 1982.

<sup>27</sup> "Tree Aging for 86 S. Fair Oaks," Jan C. Scow Consulting Arborists, LLC, June 3, 2013. The two trees include a Canary Island Date Palm (~1908) and a Camphor tree (~1913). See Appendix C Biological Resources of this SCEA.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The recreational uses associated with the period of the Hotel Green are no longer extant on the Project Site.

## Old Pasadena National Register Historic District<sup>28</sup>

The Old Pasadena Historic District (the District) was listed in the National Register of Historic Places in 1983 and amended in 2008. The nomination form for the District specifies that it is significant in local history under National Register Criteria A and C. As the historic commercial center of Pasadena, the District documents the economic development of the city and its various phases of growth between 1886 and 1936. The District also contains an important record of the evolution of architectural design in southern California as well as the work of many prominent regional architects.

The District boundaries are irregular and incorporate Fair Oaks and Raymond Avenues, the main north-south streets, and Colorado Boulevard, the main east-west street. It is generally bound on the north by Chestnut Street, on the west by Pasadena Avenue, on the south by Del Mar Boulevard and on the east by the MTA Gold Line/L Line tracks. The District contains 154 contributing and 40 noncontributing resources, which form the historic downtown of the City of Pasadena. Dating from 1886 through 1936, the buildings visually document the District's economic and social booms. Predominantly commercial in nature, the District also includes a few residential buildings, a train station, some light industrial buildings, several churches, and a park. The strong stylistic eras of Old Pasadena can be discussed using three streets within the District as examples: Fair Oaks Avenue (1880s), Raymond Avenue (1890-1915), and Colorado Boulevard (1929-30). Surrounding streets, especially Union Street and Green Street, offer small-scale buildings, which reflect their industrial and service support to businesses along the major commercial streets. Since the District was originally listed in 1983, many of the contributing buildings have been extensively rehabilitated in a manner consistent with the Secretary of the Interior's Standards. A few contributing buildings have been demolished, and several new noncontributing buildings have been constructed. Most of the new construction occurred on vacant and surface parking lots and is generally compatible with the historic architecture of the District. Overall, the District retains a high-level of integrity and continues to convey its historic significance.

Due to the changes that occurred within the District since it was first designated in 1983, it was re-evaluated in 2008. At that time, the boundaries were expanded, and individual buildings within the District were re-classified as necessary.

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<sup>28</sup> United States Department of the Interior, National Park Service, "Old Pasadena Historic District (Additional Documentation/Boundary Change)" National Register of Historic Places Registration Form, 2008.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The District is formally listed in the National Register and is listed in the California Register. Because it is listed in the National and California Registers, the District is considered a mandatory historical resource under CEQA.

There are several contributors to the District adjacent to the Project Site. These include the following buildings (numbers below are keyed to their locations on the map provided in **Figure 4.5-2, Nearby Historical Resources Map**). Site and building photographs are included in the Historic Resources Report, **Appendices A and B**.

- 1-2. 99 South Raymond Avenue,  
50 East Green Street  
(Hotel Green/Castle Green)

Adjacent to the Project Site on the same block is the Hotel Green/Castle Green. In addition to being a contributor to the Old Pasadena Historic District, the Hotel Green/Castle Green is individually listed in the National Register along with the Project site. The nomination form for the property indicates that it is significant in local history under National Register Criteria A and C as one of the few grand nineteenth century hotel buildings in California to survive to the present day. Instrumental in the settlement of Pasadena in the 1890s and early 1900s, the hotel also fostered the social, cultural and economic development of the city. It is architecturally significant as a work of historic eclecticism, by architect Frederick L. Roehrig, popular in the late nineteenth century.

Although not directly stated in the National Register nomination, the period of significance can be established for the Hotel Green/Castle Green as beginning in 1898 when the hotel expanded across Raymond Avenue and the West Annex (Castle Green) was constructed, and ends in 1924 when the West Annex was sold and converted into cooperative apartments and renamed the Castle Green, thus ending the resort era of the hotel.

The Hotel Green/Castle Green occupies the block between Fair Oaks and Raymond Avenues on the west and east and Green and Dayton Streets on the north and south, which is the same block as the Project Site. The entire block is included as the boundary in the individual nomination for the Hotel Green/Castle Green.

The Castle Green, then called the West Annex, was constructed in 1898 and was connected to the original portion of the Hotel Green at the second story by a pedestrian bridge over Raymond Avenue. In 1903, an addition, then called the North Annex was constructed along the length of Green Street and connected to

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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the Wooster Block, which was constructed in 1887. This portion of the building is now referred to as the Hotel Green.

The Castle Green (1898, Frederick L. Roehrig, architect) has a north-south orientation and sits approximately 100 feet from Raymond Avenue and 30 feet from Dayton Street, which provides space for a large garden along Raymond Avenue. It is a six- and seven-story building that is eclectic in design with references to Spanish Colonial Revival and Islamic architecture. The steel-framed and brick building has a dash coat cement-plaster finish. The large scale of the building is relieved by a variety of treatments to its massing, roofline, fenestration, and exterior ornamentation.

The Hotel Green (1887, C.L. Strange, architect; 1903, Frederick L. Roehrig, architect), originally the Wooster Block and the North Annex, extends along Green Street from Raymond to Fair Oaks Avenues. Although they were constructed at different times by different architects, they were joined internally and are both steel-framed structures sheathed in cement plaster.

The seven-story North Annex is covered by a low-pitched hipped roof with corbelled supporting brackets, while the six-story middle section has a shed roof carried on overhanging eaves. The window and door openings have little detailing. There is a large buttressed brick chimney on the most eastern point. The south facade has a prominent one-story semicircular projection of what was originally the hotel's dining room with square towers at both ends.

The six-story Wooster Block is distinct from the North Annex. The building's wealth of detail recalls Romanesque characteristics. It has a low-pitched shed roof with overhanging eaves, exposed rafters, and clay tiles. The street-facing elevations are articulated by numerous bays and arches.

### 3. 84 South Fair Oaks Avenue

This one-story commercial brick vernacular building was constructed circa 1925. It is immediately south of the Wooster Block of the Hotel Green. The building is finished with roughly textured cement plaster. The west facade on Fair Oaks Avenue has a single storefront with vertically proportioned openings and a decorative cornice.

## ***Resources Located in the Immediate Vicinity of the Project Site***

Resources located in the immediate vicinity of the Project Site include contributors to the Old Pasadena Historic District. The contributors within the immediate vicinity of the Project Site are identified in this section.

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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Contributing resources in the immediate vicinity include:

1. Central Park

Central Park is located south of the project site. It is a 9.2-acre site and is bounded by South Raymond Avenue on the east, Dayton Street on the north, South Fair Oaks Avenue on the west, and East Del Mar Boulevard on the south. The Castle Green and Project Site are to the north and the Santa Fe Train Station is to the east. Central Park and Memorial Park (in the Pasadena Civic Center National Register District) are the oldest parks in the city, the land for both parks having been purchased in 1902. Many mature trees, broad lawns, and a few small buildings connected by winding paths form the general plan of the park. The park became a recreation ground for the tourists staying at the neighboring Hotel Green.

The park was originally designed by Thomas Chisholm, but mainly reflects a redesign by Cook, Hall and Ralph Cornell in 1927. Most of the original footpath configuration of intersecting circles and oval still exists, notably the large oval in the center.

2. 150 South Raymond Avenue

Constructed in 1920, this two-story industrial brick building located on the east side of Raymond Avenue across from Central Park was originally designed as a factory. The utilitarian design features large window openings stacked vertically and spaced evenly on all four sides. The arched openings have divided-light wood sash windows.

3. 80-82 South Raymond Avenue (remnant of Hotel Green)

This one-story building at the southeast corner of Raymond Avenue and Green Street is all that remains of the original portion of the Hotel Green on the east side of Raymond Avenue. Ed Webster sold his hotel to Colonel Green in 1891, who proceeded to build the annex across the street. In 1935, the original four-story hotel was demolished except for this remnant.

4. 62-70 South Raymond Avenue

Constructed in 1902, this three-story, plaster-over-brick building, located at the northeast corner of Raymond Avenue and Green Street, was originally constructed as a hotel, perhaps as a residence for employees of the Hotel Green. The widening of Green Street in 1926 caused the 20 feet of the south end of the building to be demolished. The ensuing remodeling included the South Raymond Avenue facade.



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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5. 103-115 South Fair Oaks Avenue (Doty Block)

This large three-story red brick building, constructed in 1887, is located to the west of the Project Site. The principal facade (along Fair Oaks Avenue) has eight bays defined by brick pilasters, accented at each story by massive blocks of grey rusticated stone tied together by narrow projecting bands of molding above the first and second stories. Built during the boom of the late 1880s for James E. Doty, the Doty Block was one of the earliest substantial brick buildings in the city. Doty's carriage business was one of the largest in the San Gabriel Valley during the 1890s. The building originally had a corner tower and projecting bays, which were removed in 1924. In 1998 the building was rehabilitated. The work included the replacement of brickwork that had been damage by abrasive cleaning and the replacement of the storefronts, except for the original cast-iron columns.

6. 155 South Fair Oaks Avenue  
(Star Saddle Livery)

Constructed in 1906 to the design of Hunt & Grey, this two-story cement plaster-over-brick building is in the Mission Revival style. This building is located on the west side of Fair Oaks Avenue across from Central Park. A three-story tower on the north side and a two-story bay with a wide garage entrance on the south dominates the building. This southern bay, a 1910 addition was built on the site of a former corral. Built for Charles N. Post, a local banker, the livery served guests of the Hotel Green who were interested in pleasure riding. Similar to many liverys, the building became an auto repair shop in the 1930s. Original architectural elements include the pitched roofs finished with red clay tile, arched window headers, divided-light wood sash casement windows, and original hayloft doors on the rear. The storefronts replaced what were originally barn-style doors. The building was rehabilitated in 1991 and again in 1999.

## FRAMEWORK FOR ANALYSIS

The following analysis is informed by National, State and local guidelines.

### CEQA Thresholds of Significance

The *CEQA Guidelines* indicate that a project would have a significant impact on a historical resource if it would result in a substantial adverse change in the significance of a historical resource as defined in § 15064.5.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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As defined in § 15064.5(b)(1), a substantial adverse change in the significance of a historic resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.<sup>29</sup>

Section 15064.5(b)(2) further states that “[t]he significance of an historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local register of historic resources... or its identification in a historic resources survey.”<sup>30</sup>

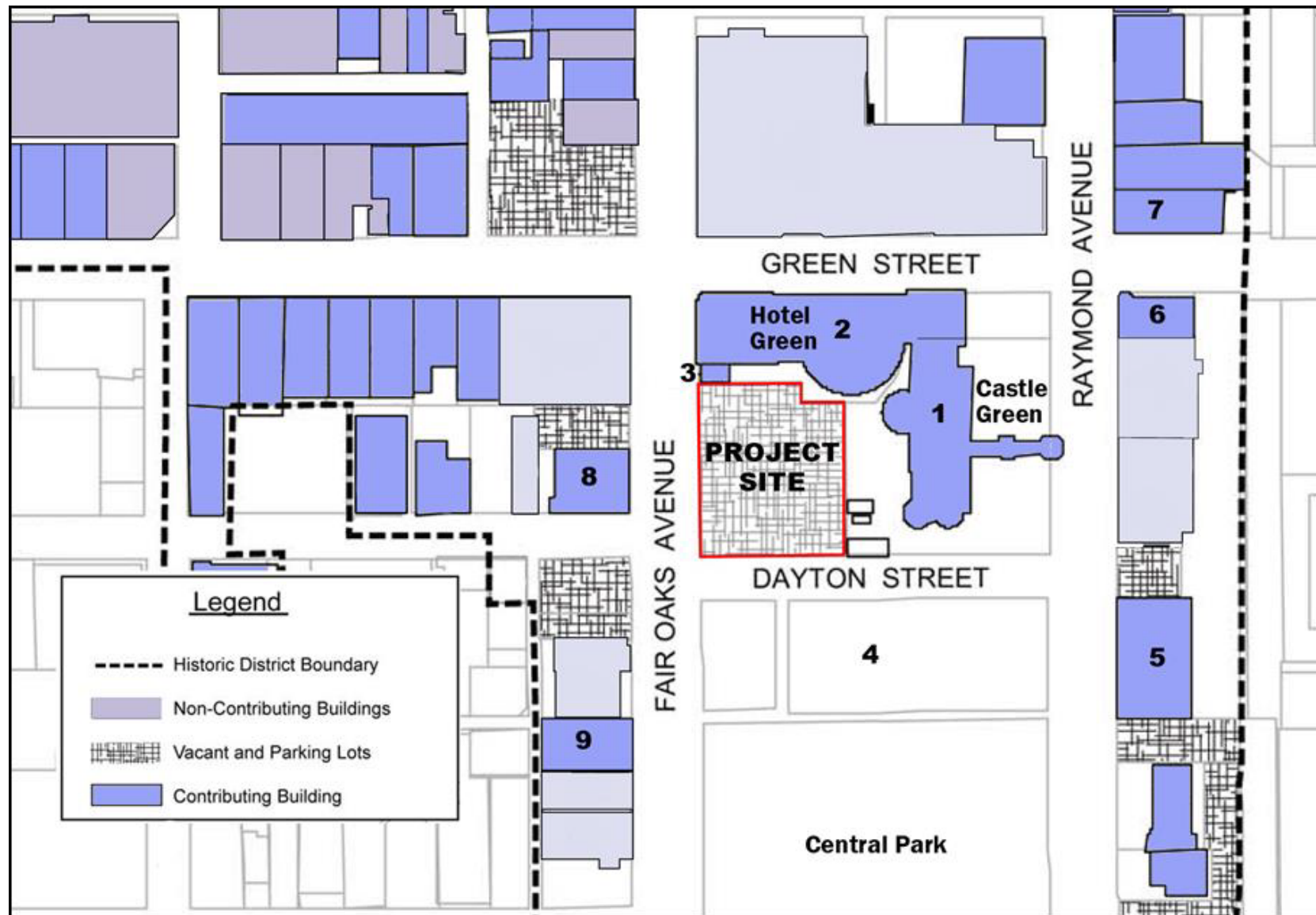
## Additional Guidance

### *Secretary of the Interior's Standards*

The Secretary of the Interior's Standards for the Treatment of Historic Properties (the “Standards”) provide guidance for reviewing proposed projects that may affect historic resources.

<sup>29</sup> CEQA Guidelines, section 15064.5(b)(1). [https://govt.westlaw.com/calregs/Document/IA0E0C760D48811DEBC02831C6D6C108E?transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/IA0E0C760D48811DEBC02831C6D6C108E?transitionType=Default&contextData=(sc.Default)).

<sup>30</sup> CEQA Guidelines, section 15064.5(b)(2). [https://govt.westlaw.com/calregs/Document/IA0E0C760D48811DEBC02831C6D6C108E?transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/IA0E0C760D48811DEBC02831C6D6C108E?transitionType=Default&contextData=(sc.Default)).



SOURCE: Historic Resources Group, September 2018

FIGURE 4.5-2

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation, rehabilitation, and maintenance of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. The Standards also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction.

From a practical perspective, the Standards have guided agencies in carrying out their historic preservation responsibilities including State and local officials when reviewing projects that may impact historic resources. The Standards have also been adopted by State and local jurisdictions across the country.

In addition, the Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. However, these Guidelines and Regulations are not part of the CEQA process. CEQA requires analysis of physical impacts to the environment and the only relationship of the Secretary of the Interior Standards to the CEQA process are discussed under *CEQA Guidelines* Section 15064.5(b)(3):

*“Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings” (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.”*

While not a threshold of significance, the analysis herein evaluates the project against the Secretary of the Interior's Standards as an additional analytical tool to provide further context of the project's potential impacts on historical resources. A project that conforms to the Secretary of the Interior's Standards would clearly not have a significant impact on historical resources. However, inconsistency with the Secretary of the Interior's Standards does not, itself, render a project's impact on historical resources significant pursuant to CEQA.

The statutory language above references the Secretary of the Interior's Standards and Guidelines for four distinct historic "treatments," including: (1) preservation; (2) rehabilitation; (3) restoration; and (4) reconstruction. The specific standards and guidelines associated with each of these possible treatments are provided on the National Park Service's website regarding the treatment of historic resources.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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For analytical purposes, a decision must be made regarding which “treatment” standards should be used to analyze a project’s potential effect on historic resources. “Preservation” refers to the straightforward stabilization and maintenance of a historic property. “Restoration” addresses the return of a property to a specific time period and includes reconstruction of features missing from that time period. “Reconstruction” addresses the depiction of a no longer extant historic property through new construction.

The use of the Secretary of the Interior’s “rehabilitation” standards (the Rehabilitation Standards) addresses the most prevalent and widely used treatment. "Rehabilitation" is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values." “Rehabilitation” recognizes necessary alteration for contemporary use and therefore provides a more appropriate impact analysis than the other treatment standards, and accounts for the fact that the adjacent properties will likely require some form of protection during construction activities and ongoing maintenance over the term of the construction.

### ***Rehabilitation Standards***

The National Park Service encourages maintaining the integrity of a historic resource through the appropriate design of infill buildings at sites adjacent to historic resources. The Standards are intended as general guidance for work on any historic building. The Rehabilitation Standards expand the discussion to sites and neighborhoods.

Rehabilitation Standards #9 and #10 address related new construction. Standard 9 in part states: “New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.”<sup>31</sup> Standard 10 states: “New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”<sup>32</sup>

As written in the Rehabilitation Standards, there is a distinction, but not a fundamental difference, between the concerns for additions to historic buildings and new construction, or “infill” adjacent to historic buildings

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31 [http://www.nps.gov/hps/tps/standguide/rehab/rehab\\_standards.htm](http://www.nps.gov/hps/tps/standguide/rehab/rehab_standards.htm)

32 Ibid.

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on a property or within a historic district. As with most matters of design and planning, the differences are defined by the scale, site, setting, and project.

Following are quotations from the National Park Service guidance that relate to the proposed Project.

*“...a modern addition should be readily distinguishable from the older work; however, the new work should be harmonious with the old in scale, proportion, materials, and color.”*

*“Plan the new addition in a manner that provides some differentiation in material, color, and detailing so that the new work does not appear to be part of the historic building. The character of the historic resource should be identifiable after the addition is constructed.”<sup>33</sup>*

### **National Park Service: Preservation Brief 14**

In addition to the Standards and Guidelines for Rehabilitation, the National Park Service publishes a series of briefs that includes “Preservation Brief 14, New Exterior Additions to Historic Buildings: Preservation Concerns,” as revised and republished in 2010. Among the concepts presented are a balance between differentiation and compatibility, and subordination of the new to the old.

Preservation Brief 14 states:

1. There is no formula or prescription for designing a new addition that meets the Standards. A new addition to a historic building that meets the Standards can be any architectural style -- traditional, contemporary or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility in order to maintain the historic character and the identity of the building being enlarged. New additions that too closely resemble the historic building or are in extreme contrast to it fall short of this balance. Inherent in all of the guidance is the concept that an addition needs to be subordinate to the historic building.
2. The intent of the Preservation Briefs is to provide guidance to owners, architects, and developers on how to design a compatible new addition.... A new addition to a historic building should preserve the building’s historic character. To accomplish this and meet the Secretary of the Interior’s Standards for Rehabilitation, a new addition should:
  - Preserve significant historic materials, features and form;

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<sup>33</sup> Anne E. Grimmer and Kay D. Weeks, “Preservation Briefs 14, New Exterior Additions to Historic Buildings: Preservation Concerns,” (Washington D.C.: National Park Service, U.S. Department of the Interior) 2010.

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- Be compatible; and
- Be differentiated from the historic building.

## IMPACT ANALYSIS

The following analysis uses the thresholds provided above.

### Potential Impacts from Demolition

The Project proposes new construction that would occupy a parcel currently used primarily as a surface parking lot. The Project proposes to demolish the existing surface parking lot, landscaped area, and shuffleboard court. It also proposes to remove one billboard and up to 18 mature trees (refer to **Section 4.4, Biological Resources**).

The Project Site is located within the boundary identified in the Hotel Green/Castle Green National Register nomination. The existing condition of the Project Site was established after the period of significance for the Hotel Green/Castle Green (1898-1924). Because they were developed after the period of significance, the surface parking, landscaped area, and shuffleboard court located on the site are not considered character-defining features of the Hotel Green/Castle Green.

The mature trees scheduled for removal, one of which dates closest to the early landscape design (1903) for the Hotel Green era, are remnants of an earlier landscape design that no longer exists on the site, and the context of the original landscape in which the trees were meaningful is no longer extant. Therefore, the trees are also not considered character-defining features of the Hotel Green/Castle Green. As applicable, removal of any protected trees would otherwise occur consistent with the requirements of the City's Trees and Tree Protection Ordinance.

Because the existing condition of the site no longer reflects the landscape and recreational uses associated with the Hotel's period of significance, demolition of the billboard, surface parking lot, landscaped picnic area, shuffleboard court, and removal of the mature trees would not alter the property's integrity. The historic character of the property as a whole would be retained after demolition, and the site would retain both its National Register and CRHR eligibility. The proposed demolition would not result in a significant direct impact to historic resources on the Project Site.

The Project does not propose to demolish or alter the existing adjacent resources including the Hotel Green/Castle Green or the building at 84 South Fair Oaks Avenue or alter any existing resources in the

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immediate vicinity. Therefore, the proposed demolition would not result in a significant direct impact on the existing adjacent resources or the existing resources in the immediate vicinity.

## Potential Impacts from New Construction

The proposed new construction would replace an existing surface parking lot and landscaped area. New construction would be located within the Old Pasadena Historic District and immediately adjacent to District contributors Hotel Green/Castle Green and the commercial building at 84 South Fair Oaks Avenue. The proposed new construction would also be located within the boundaries of the Hotel Green/Castle Green, an individually listed historic resource. The proposed Project would be located directly north of District contributor Central Park and in the immediate vicinity of contributing buildings at 150 South Raymond Avenue, 80-82 South Raymond Avenue, 62-70 South Raymond Avenue, 103-115 South Fair Oaks Avenue, and 155 South Fair Oaks Avenue.

The Project proposes new construction of a six-story building plus penthouse that would reach a maximum roof height of 90 feet, which is 3 feet and 6 inches shorter than the 93-foot and 6-inch maximum roof height of tallest portions of the adjacent Hotel Green/Castle Green. The new building would be situated at the far southwest portion of the parcel and would maintain grade-level open space between the existing historic buildings and the new building. Approximately 38 feet of open space would separate the south façade of the Hotel Green building and the new construction. Approximately 76 feet of open space would be maintained between the east façade of the new building and the west façade of the Castle Green building. The new building would be located approximately 13 feet from the existing one-story building at 84 South Fair Oaks Avenue.

## Impacts to Surrounding Historic Resources

The Project would not demolish or alter any historic building on the Project Site or in the near vicinity of the Project site. However, because the Project would construct a six-story plus penthouse building on a parcel largely used as surface parking under current conditions, the immediate surroundings of the adjacent historic resources discussed above would be altered. The analysis below evaluates whether these alterations would materially impair any of the surrounding historical resources and thus result in a substantial adverse change in the significance of a historical resource(s).

The additional guidance provided by the National Park Service for reviewing proposed new construction that may affect an historic resource, as stated above, be it an addition to an existing building or an infill



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building within an historic district, strive for the same outcome: a balance between compatibility and differentiation, and the retention of integrity.

Standard 9 in part states: “New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.”<sup>34</sup> Standard 10 states: “New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”<sup>35</sup>

An analysis of the alteration to the immediate surroundings of each of the potentially affected historic resources follows below.

### ***Potential Impacts to the Hotel Green/Castle Green from New Construction***

The Hotel Green/Castle Green is significant as one of the few 19<sup>th</sup> century resort hotel buildings in California to survive to the present day. Instrumental in the settlement of Pasadena in the 1890s and early 1900s, the hotel also helped foster the social, cultural and economic development of the City. Designed by noted regional architect Frederick L. Roehrig, the Hotel Green/Castle Green is also architecturally significant as an outstanding example of historic eclecticism popular in the late nineteenth century.

The historic significance of the Hotel Green/Castle Green is largely conveyed by the public-facing primary facades oriented towards the adjoining public streets. These include the east façade of the Castle Green portion of the building facing east to Raymond Avenue, the south end of Castle Green facing Dayton Street, and the north façade of the Hotel Green portion of the building facing Green Street. Typically, these facades are considered “primary” because they were designed to directly address and communicate with the public right-of-way forming the “front” of the two buildings. It is these facades that contain public entrances and the highest level of design articulation, exterior ornamentation, and variations in massing and rooflines.

In contrast, the west-facing façade of the Castle Green portion and south-facing façade of the Hotel Green were somewhat less concerned with engaging the public as they front interior park and patio spaces. Anticipated development fronting Fair Oaks Avenue (never realized) would have further enclosed the interior of the block. Although also public facing in that they look onto park space and are visible from the

<sup>34</sup> [http://www.nps.gov/hps/tps/standguide/rehab/rehab\\_standards.htm](http://www.nps.gov/hps/tps/standguide/rehab/rehab_standards.htm)

<sup>35</sup> [http://www.nps.gov/hps/tps/standguide/rehab/rehab\\_standards.htm](http://www.nps.gov/hps/tps/standguide/rehab/rehab_standards.htm)

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park and Dayton Street, comparatively, these facades represent the “rear” elevations of the two buildings in that they did not provide primary entrance into the two buildings. As such, they are generally considered “secondary.” While still carefully articulated, these facades display less of the variation and exterior ornamentation seen on the facades facing Raymond Avenue and Green Street.

The primary (east) façade of the Castle Green portion of the building faces east towards Raymond Avenue. This façade was historically, and remains today, the primary entrance to the Castle Green. The building was set back approximately 100 feet from the street to create a landscaped park-like area fronting the main entrance. This garden was the only park-like feature in Pasadena at the time. Extending from the center of this façade to the curb of Raymond Avenue is the remaining section of an enclosed pedestrian bridge that once spanned the street and linked to the original Hotel Green building (no longer extant) across the street. The design articulation of east façade, the remnant pedestrian bridge and the front garden all combine to create the primary public face of the building.

The primary (north) façade of the Hotel Green portion of the building faces north along Green Street. This section was an addition to the Castle Green building at the northeast corner, spanned Green Street and adjoined the existing Wooster Block at the northwest corner. Articulated with numerous bays and arched openings at street level, the north façade is oriented to the public with street-facing shops and entrances.

Development of the Project Site would be confined to the southwest parcel of the block, and therefore important street views from the north and south along Raymond Avenue and from the east along Green Street to the Hotel Green/Castle Green would remain unaltered. The building’s primary east- and north-facing façades would not be obscured by the proposed Project.

The Project would block certain views and obscure certain currently available public sight lines to the secondary west façade of the Castle Green and the south façade of the Hotel Green. Both facades are oriented toward the interior of the block and display less of the distinctive design articulation characteristic of the primary facades which were designed to directly engage the public right-of-way. The proposed building would obscure the west façade of the Castle Green building, particularly from the west along Fair Oaks Avenue and from the southwest along Dayton Street. The west façade would remain visible when viewed northeast from the central portions of Dayton Street and Central Park, where landscaped open space would remain between the two buildings. The proposed new building would also partially block the Hotel Green’s south façade from public view when viewed from the west and southwest. Both facades have historically been unobstructed.

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The Project conforms to Standard 9 as the current configuration of the open space is not a contributing factor to the historic significance of the Hotel Green/Castle Green. Instead, it is the location, massing and architectural detailing of the Hotel Green/Castle Green buildings which convey its historic significance. After implementation of the Project the L-shaped configuration and orientation of the historic buildings would remain discernible after construction and the primary east- and west-facing facades would remain unobstructed. The Project includes grade-level open space to provide a spatial buffer between the existing buildings and the new construction so that the west façade of the Castle Green and south façade of the Hotel Green would remain discernable despite visual obstruction from the street. Although spatial relationships would be altered by the proposed new construction, the historic buildings would remain in their original locations and would not be physically altered by the new construction. The Castle Green/Hotel Green would continue to convey its historic significance after Project construction.

As noted in above, *historic integrity* is the ability of a historic resource to convey its significance. The National Park Service defines seven aspects of integrity: *location, design, setting, materials, workmanship, feeling, and association*. The Project would not affect the integrity of *location, design, materials, or workmanship* of the Castle Green/Hotel Green. The building would remain intact in its current location and would not be materially altered by new construction to the south and west. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the Castle Green/Hotel Green would continue to convey the property's historic significance. Because the Castle Green/Hotel Green would retain integrity of *location, design, materials, workmanship, and feeling*, it would continue to reflect its historic significance as a late-19<sup>th</sup> and early 20<sup>th</sup> century resort hotel in Pasadena, therefore integrity of *association* would also remain unaffected by the Project.

The only aspect of integrity that would be affected by the Project is *setting*. The Project would alter the setting of the Castle Green/Hotel Green by constructing a new building in an area that has historically been devoid of buildings. As noted earlier, this area has been substantially altered since the period of significance and today contains a surface parking lot with landscaping, outdoor furniture and an advertising billboard. Setting features important to the historic significance of the Castle Green/Hotel Green include the configuration of street and sidewalk fronting the building's north- and east-facing façades, and the spatial relationships with buildings to the north, east and west that are also included within the District boundary. All of these would remain unchanged by the Project. The Castle Green/Hotel Green would retain integrity of *location, design, materials, workmanship, feeling, and association*. Integrity of *setting* would be compromised by the new construction associated with the Project but the setting features most important to conveying the historic significance of the property would remain unchanged. All but one of the seven aspects of integrity will be entirely retained after implementation of the Project (and the one aspect affected,

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*setting*, would be partially retained) and the Castle Green/Hotel Green would retain sufficient integrity to convey its historic significance.

The proposed new construction would also include substantial foundation work and the construction of subterranean parking. The required excavation, general construction procedures and associated vibration has the potential to de-stabilize the Castle Green/Hotel Green property. Vibration issues are examined in **Section 4.13, Noise**, below, to address potential impacts from vibration to adjacent buildings and ensure that the historic buildings are protected. The Noise analysis determined that with mitigation to reduce potential vibration impacts associated with construction activities to a less than significant level, the Project would avoid significant impacts to the Castle Green/Hotel Green.

In summary, the integrity and significance of the Hotel Green/Castle Green would not be materially impaired by alterations to its surroundings caused by the Project, and it would maintain its eligibility for listing in the National Register and California Register. The proposed new construction would not result in significant impacts to the Hotel Green/Castle Green.

### ***Alteration to the Old Pasadena Historic District***

The Project Site is located within the Old Pasadena Historic District. New construction would be within the District boundaries and within the vicinity of several buildings that are district contributors. In addition to the Hotel Green/Castle Green, the closest District contributor is the single-story commercial building at 84 South Fair Oaks Avenue, a small-scale commercial storefront from the mid-1920s located immediately north of the Project Site. Other contributing buildings are located on the opposite side of South Fair Oaks Avenue.

The Old Pasadena Historic District is significant as the historic commercial center of Pasadena. The District documents the economic development of the city and its various phases of growth between 1886 and 1936. The District is composed of a variety of property types and architectural styles that are largely commercial in nature.

Characteristic of pre-World War II commercial areas, the District is scaled to the pedestrian. Contributing properties to the District are oriented toward the street with architectural articulation largely confined to street-facing façades. The side- and rear-facing facades were constructed with minimal articulation in reaction to and in anticipation of the construction of neighboring buildings. The District's historic significance is experienced primarily from the street either by pedestrians or passing vehicles. The significance of the

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District contributors in the immediate vicinity is largely conveyed by their street-facing facades along Fair Oaks and Raymond Avenues, and these facades would not be obscured by the new construction.

The Old Pasadena Historic District is characterized by a diverse collection of buildings of varying heights and densities, with heights ranging from one story up to eight stories. The majority of buildings are built to the sidewalk with little or no setback. The proposed new construction would maintain the prevailing setback and would have a similar street orientation to the contributing buildings in the District, including ground-floor retail. At six stories plus penthouse, the proposed new building would be taller than most of the nearby contributing buildings, including the one-story commercial brick vernacular building at 84 South Fair Oaks Avenue immediately north of the Project site, and the three-story red brick building (Doty Block) located across the street at 103-115 South Fair Oaks Avenue.. This contrast in scale, however, is in keeping with the overall character of the District which contains contributing buildings ranging from one to seven stories in height.

Central Park, a contributor to the Old Pasadena Historic District, is significant as one of Pasadena's oldest parks. Many mature trees, broad lawns, and a few small buildings connected by winding paths form the general plan of the park. The park became a recreation ground for the tourists staying at the neighboring Hotel Green.

As noted earlier in this report, when the planned Fair Oaks Avenue wing of the Hotel Green was not built, the southwest parcel was landscaped to complement Central Park. By 1951, the parcel was no longer used strictly for recreation and partially became a surface parking lot. A pool was added to the site in 1953 to service the Hotel Green and removed in the early 1970s when the building became low-income residential apartments. Even though one remnant tree would remain on the parcel from the period of the hotel, the historic landscape is no longer discernible, and the Project parcel no longer conveys its past use as a designed landscaped area or its visual association with Central Park. Additionally, the Project would not significantly impact views or obscure public sight lines of Central Park.

Overall, the proposed new construction is compatible with the overall character of the Old Pasadena Historic District, and the integrity of the District would not be materially impaired by alterations to its setting caused by the Project. The proposed new construction would not diminish the ability of any District contributor, including the adjacent building at 84 South Fair Oaks Avenue, to convey its significance as a contributor to the Historic District. All contributors' primary facades would remain intact and fully visible from the street.

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The Project will include substantial foundation work and the construction of subterranean parking. The required excavation, general construction procedures and associated vibration has the potential to destabilize nearby contributing buildings including the 84 South Fair Oaks property. Vibration issues are examined in the Noise sections of the CEQA document to address potential impacts from vibration to adjacent buildings. The Noise analysis determined that with mitigation to reduce potential vibration impacts associated with construction activities to a less than significant level, the Project would avoid significant impacts to adjacent historic buildings.

Although the Project would construct a new building within the Old Pasadena Historic District boundaries, all but one of the seven aspects of integrity would be unaffected by the Project. The Project would not affect the integrity of *location, design, materials, or workmanship* for the District or any of its component contributing buildings. All contributing buildings would remain intact in their current locations and would not be materially altered by new construction associated with the Project. Therefore, integrity of *feeling* would also remain unaffected because all the existing physical elements that characterize the District and contributing buildings would remain and continue to convey their historic significance. Because all the important physical characteristics of the District would remain, they would continue to reflect their important associations with the commercial development of Pasadena during the late 19<sup>th</sup>- and early 20<sup>th</sup> centuries, therefore integrity of *association* would also remain unaffected by the Project. The only aspect of integrity that could possibly be affected by the Project is *setting*.

Setting features important to the Old Pasadena Historic District include the configuration of streets and sidewalks fronting District buildings, the pattern of tightly spaced buildings defining a central business district, and the public circulation space delineated by uniform building street walls. Adding a new building of compatible size and scale that maintains the prevailing building and set-back pattern characteristic of the District would not adversely alter the setting of the District such that its listing on the National Register would be threatened.

Despite the construction of a new building within the District boundaries and on land currently developed with surface parking and landscaping, the Old Pasadena Historic District would continue to convey its historic significance after implementation of the Project.

## ***Compatibility***

As stated previously, while compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties is not a significance threshold, Section 15064.5(b)(3) of the *CEQA Guidelines* states:

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*“Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings” (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.”*

These Standards and additional guidance provided by the National Park Service for reviewing proposed new construction that may affect an historic resource, as stated above, be it an addition to an existing building or an infill building within an historic district, strive for the same outcome: a balance between compatibility and differentiation, and the retention of integrity.

Standard 9 in part states: “The new work shall be differentiated from the old and would be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.”<sup>36</sup>

The proposed new construction would be differentiated from adjacent historic resources. It would be a contemporary design with balanced symmetrical proportions and would recall historic features that complement the eclectic design of the Hotel Green/Castle Green. As demonstrated in renderings presented in **Figure 2.0-34** through **Figure 2.0-38**, and **Figure 4.1** through **Figure 4.9** presenting visual simulations of the proposed project, the Project is compatible with the adjacent historic resources and the historic character of the District in terms of materials, features, size, scale and proportion. The new building is L-shaped in plan and has massing similar to the Hotel Green/Castle Green. It also recalls traditional historic architectural design details including an emphasized base level, tower feature, arched windows, similarly proportioned fenestration, punched windows, cement plaster finishes, and a low-pitched roof with supporting brackets. The new building would also maintain the prevailing setback of the adjacent and nearby District contributors, continuing the street wall that defines and contains the immediate blocks of Fair Oaks Avenue.

The Project conforms to Standard 9 because it would be differentiated from the historic resources adjacent to the site and would be compatible with the size, scale, proportion, and massing to protect the integrity of the site and its surroundings.

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<sup>36</sup> [http://www.nps.gov/hps/tps/standguide/rehab/rehab\\_standards.htm](http://www.nps.gov/hps/tps/standguide/rehab/rehab_standards.htm)

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Standard 10 states: “New additions and adjacent or related new construction would be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”<sup>37</sup>

The Project would not be an addition to the adjacent historic resources. It would be a new building separate and apart from the existing buildings. As such, if the new construction is removed in the future the form and integrity of the adjacent historic resources, and the historic district, would be preserved. The Project conforms to Standard 10.

In summary, the design of the proposed new construction would be differentiated from the immediately surrounding buildings, would be compatible in size, scale and massing, and would be a new building separate and apart from the adjacent existing buildings. The new construction would not result in a substantial adverse impact on the site or on existing adjacent resources and is, further, consistent with the Secretary of the Interior’s Standards.

## Summary of Potential Impacts on Historical Resources

Analysis of the potential impacts to historical resources has found that with the implementation of mitigation measures regarding potential vibration impacts, and the recommendations of an approved Geotechnical Report, the Project would not result in significant adverse impacts on the identified historical resources located within and adjacent to the Project Site. The Project would not result in a substantial adverse change in the significance of the Old Pasadena Historic District or the Hotel Green/Castle Green or the building at 84 South Fair Oaks Avenue. Impacts on historical resources are less than significant and no further mitigation measures are required.

*b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

☐
☒
☐
☐

**WHY?** There are no known prehistoric or historic archeological sites on the project site. However, the project involves grading into previously undisturbed soils and it is not known if the project site itself has archeological resources. Thus, construction of the project could encounter previously undiscovered archeological resources. In the unlikely event that archaeological resources are discovered during construction, Mitigation Measure 4-1 from the City of Pasadena General Plan EIR, as reiterated below, would apply as implemented by the General Plan’s Mitigation Monitoring and Report Program (MMRP). As required by Mitigation Measure 4-1 of the City’s General Plan EIR, in the event that an unanticipated

<sup>37</sup> [http://www.nps.gov/hps/tps/standguide/rehab/rehab\\_standards.htm](http://www.nps.gov/hps/tps/standguide/rehab/rehab_standards.htm)



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discovery is encountered, the find must be assessed by a professionally qualified archaeologist to determine if the find may be significant. If determined to be of significance, the materials would be recovered, evaluated, documented, and repositied with a reputable research institution or museum, consistent with General Plan EIR Mitigation Measure 4-1 and the corresponding MMRP. With the implementation of General Plan EIR Mitigation Measure 4-1 the proposed project would not significantly impact archaeological resources.

If archaeological resources are discovered during construction, Mitigation Measure 4-1 from the City's General Plan EIR would apply as follows:

**General Plan EIR Mitigation Measure 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.

*c. Disturb any human remains, including those interred outside of formal ceremonies?*

☐ ☐ ☒ ☐

**WHY?** There are no known human remains on the site. The project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. Thus, human remains are not expected to be encountered during construction of the proposed project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. Compliance with these regulations would ensure the proposed project would not result in significant impacts due to disturbing human remains.

#### 4.6 ENERGY

Would the project:

*a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

☐ ☐ ☒ ☐

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*Vehicle and Equipment Fuel Consumption.* Construction of the proposed project would result in a short-term consumption of petroleum-based fuels to power construction vehicles and equipment. During project operations, motor vehicle travel and building maintenance equipment would consume petroleum-based fuels. Fuel consumption of motor vehicles in California is regulated by both the U.S. Department of Transportation's Corporate Average Fuel Economy standards and the CARB's Clean Car Standards. The proposed project would not create a high enough demand for energy to require development of new energy sources. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the project site, for construction worker travel to and from the project site, as well as for delivery truck trips; and to operate generators to provide temporary power for lighting and electronic equipment.. However, the additional amount of resources used would not cause a significant reduction in available supplies.

*Building Energy Use.* In order to promote energy conservation, the City has adopted an amended California Green Building Standards Code (14.04.500). In conformance with the City's building code the project would be designed to comply with the performance levels of an amended California Green Building Standards Code, which would reduce energy consumption compared to standard building practices. The following are requirements of the amended California Green Building Standards Code that are applicable to the project:

- All non-residential buildings of 50,000 square feet or more of new gross square footage, including medical projects, must meet California Green Building Standards Code Tier 2 Requirements (14.04.504, Section 307.2)). In addition to the mandatory measures of Tier 2, compliance with specific prerequisites and as many additional elective measures to achieve an equivalent 50 LEED® points is also required to achieve Tier 2 status (14.04.558).

The long-term impact from increased energy use by this project is not expected to be significant in relationship to the number of customers currently served by the electrical and gas utility companies. Supplies are available from existing mains, lines and substations in the area. Occupation associated with the project is not expected to significantly increase consumption of natural gas, particularly in light of redeveloped areas that would need to conform to the current performance standards of Pasadena Amended California Green Building Standards. Furthermore, in light of these requirements, the project is likely to include high efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than required rated insulation and double-glazed windows. The energy conservation measures would be prepared by the developer and shown on building plan(s) submitted to the Water and Power Department and Building Official for review and approval prior to the issuance of a building permit. Installation of energy-saving features would be inspected by a Building

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Inspector prior to issuance of a Certificate of Occupancy. In addition, the project would be designed to meet the requirements of California Green Building Standards Code Tier 2 requirements which would further reduce energy demand. Therefore, impacts related to consumption of energy would be less than significant.

*b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

☐ ☐ ☒ ☐

**Why?** As noted in the analysis above, the City has adopted an amended California Green Building Standards Code. In conformance with the City's building code the project would be designed to comply with the performance levels of an amended California Green Building Standards Code, which would reduce energy consumption compared to standard building practices. The project would be designed to meet the requirements of California Green Building Standards Code Tier 2 requirements.

The proposed project would also be required to comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). Measures to meet these energy standards may include low-flow plumbing fixtures, water-efficient irrigation systems, high-efficiency heating, ventilation, and air conditioning (HVAC) and hot water storage tank equipment, and lighting conservation features.

Installation of energy-saving features would be inspected by a Building Inspector prior to issuance of a Certificate of Occupancy. Therefore, the project would be consistent with applicable renewable energy or energy efficiency plans and this impact would be less than significant.

#### 4.7 GEOLOGY AND SOILS

Would the project:

*a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

*i. 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 Division of Mines and Geology Special Publication 42.*

☐ ☐ ☒ ☐

**WHY?** According to the 2002 adopted Safety Element of the City of Pasadena's General Plan, the San Andreas Fault is a "master" active fault and controls seismic hazards in Southern California. This fault is located approximately 21 miles north of Pasadena.

The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. Pasadena is in four USGS Quadrants, the Los Angeles, and the Mt. Wilson quadrants were mapped

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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for earthquake fault zones under the Alquist-Priolo Act in 1977. The Pasadena and Condor Peak USGS Quadrangles have not yet been mapped per the Alquist-Priolo Act.

These Alquist-Priolo maps show only one Fault Zone in or adjacent to the City of Pasadena, the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. This fault is located primarily south of City limits, however, the southernmost portions of the City lie within the fault's mapped Fault Zone. The 2002 Safety Element of the City's General Plan identifies the following three additional zones of potential fault rupture in the City:

- The Eagle Rock Fault Hazard Management Zone, which traverses the southwestern portion of the City;
- The Sierra Madre Fault Hazard Management Zone, which includes the Tujunga Fault, the North Sawpit Fault, and the South Branch of the San Gabriel Fault. This Fault Zone is primarily north of the City, and only the very northeast portion of the City and portions of the Upper Arroyo lie within the mapped fault zone.
- A Possible Active Strand of the Sierra Madre Fault, which appears to join a continuation of the Sycamore Canyon Fault. This fault area traverses the northern portion of the City as is identified as a Fault Hazard Management Zone for Critical Facilities Only.

The project site is not within any of these potential fault rupture zones. Geotechnologies, Inc. prepared the *Geotechnical Engineering Investigation (included in Appendix E)* for the proposed project in July 2019. The report reviewed the City of Pasadena's 2002 Safety Element and concluded that the potential for surface ground rupture at the subject site is considered low.

ii. *Strong seismic ground shaking?*

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**WHY?** Since the City of Pasadena is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood Faults, any major earthquake along these systems would cause seismic ground shaking in Pasadena. Much of the City is on sandy, stony or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains. This soil is more porous and loosely compacted than bedrock, and thus subject to greater impacts from seismic ground shaking than bedrock. Therefore, the *GeoTechnical Engineering Investigation* (included as Appendix A to Appendix D) conducted by Geotechnologies, Inc. in July 2019 concluded that the primary geologic hazard at the site is moderate to strong ground motion cause by earthquake. However, the risk of earthquake damage is minimized because new structures shall be built according to the California Uniform Building Code and other applicable codes, and are subject to inspection during construction. Structures for human habitation must be designed to meet or exceed California Uniform Building Code standards for Seismic Zone 4. Conforming to these

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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required standards will ensure the proposed project would not result in significant impacts due to strong seismic ground shaking.

*iii. Seismic-related ground failure, including liquefaction?*

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**WHY?** Liquefaction typically occurs where the ground water is less than 30 feet from the surface and the soils are predominately of poorly compacted sand. The most likely places for liquefaction in Pasadena are the streambed area of the Arroyo Seco and Eaton Canyon Wash. Nearly everywhere else in the City the groundwater is 200 to 400 feet below the surface. Refer to Plate 1-3 in the in the Adopted 2002 Safety Element Technical Background Report for additional information.

The project site is not within a Liquefaction Hazard Zone or Landslide Hazard Zone as shown on Plate 1-3 of the Technical Background Report to the 2002 Safety Element of the General Plan. This Plate was developed considering the Liquefaction and Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the project will have no impacts from seismic related ground failure.

*iv. Landslides?*

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**WHY?** The project site is not within a Landslide Hazard Zone as shown on Plate 1-3 of the Technical Background Report to the 2002 Safety Element of the General Plan. This Plate was developed considering the Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the project will have no impacts from seismic induced landslides.

*b. Result in substantial soil erosion or the loss of topsoil?*

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**WHY?** The natural water erosion potential of soils in Pasadena is low, unless these soils are disturbed during the wet season. Both the Ramona and Hanford soils associations, which underlay much of the City, have high permeability, low surface runoff and slight erosion hazard due to the gravelly surface layer and low topographic relief away from the steeper foothill areas of the San Gabriel Mountains.

Construction may temporarily expose the soil to wind and/or water erosion. As required by SCAQMD Rule 403, erosion caused by strong wind, excavation and earth moving operations would be minimized by watering during construction and by covering earth to be transported in trucks to or from the site.

Since the proposed project site is less than one acre in size (0.74 acres), it would not require the preparation of a General Construction Activity Stormwater Permit (GCASWP) or Storm Water Pollution Prevention Plan

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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(SWPPP). However, per City code and regulations, all projects under construction must contain all sediment and spills on-site. The following standard best management practices would be implemented by the project:

1. Every effort should be made to eliminate the discharge of non-stormwater from the project site at all times.
2. Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheet-flow, swales, area drains, natural drainage courses, or wind.
3. Stockpiles of earth and other construction-related materials must be protected from being transported from the site by the forces of wind or water.
4. Fuels, oils, solvents, and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system.
5. Excess or waste concrete may not be washed into the public right-of-way or any other drainage system. Provisions shall be made to retain concrete wastes on site until they can be disposed of as solid waste.
6. Trash and construction-related solid waste must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind.
7. Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public right-of-way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means.

Water erosion during construction would further be minimized by covering exposed excavated dirt during periods of rain and protecting excavated areas from flooding with temporary berms.

Soil erosion after construction will be controlled by implementation of an approved landscape and irrigation plan. This plan shall be submitted to the Zoning Administrator (or the appropriate staff) for review and approval prior to the issuance of a building permit. With implementation of these erosion control features, potential impacts associated with erosion during project construction and operation would be less than significant.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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- c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The City of Pasadena rests primarily on an alluvial plain. To the north, the San Gabriel Mountains are relatively new in geological time. These mountains run generally east-west and have the San Andreas Fault on the north and the Sierra Madre Fault to the south. The action of these two faults in conjunction with the north-south compression of the San Andreas tectonic plate is pushing up the San Gabriel Mountains. This uplifting combined with erosion has helped form the alluvial plain. As shown on Plate 2-4 of the Technical Background Report to the 2002 Safety Element, the majority of the City lies on the flat portion of the alluvial fan, which is expected to be stable.

The proposed project is not located on known unstable soils or geologic units, and therefore, would not likely cause on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. Modern engineering practices and compliance with established building standards, including the California Building Code, would ensure the project would not cause any significant impacts from unstable geologic units or soils.

- d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** According to the 2002 adopted Safety Element of the City's General Plan the project site is underlain by alluvial material from the San Gabriel Mountains. This soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential. Modern engineering practices and compliance with established building standards, including the California Building Code, will ensure the project will not cause any significant impacts from unstable geologic units or expansive soils.

- 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?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The project will be required to connect to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case, and the proposed project would have no associated impacts.

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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f. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

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**WHY?** The project site lies on the valley floor in an urbanized portion of the City of Pasadena. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontological resources. As shown in Figure 5.4-2 *Paleontological Sensitivity* of the Pasadena General Plan EIR, the project site is within an area of “No Sensitivity” for the paleontological resources. Plate 2-1 of the Technical Background Report to the Safety Element of the Technical Background Report to the Safety Element of the General Plan identifies the project area with Pleistocene alluvial fan gravel and sand (non-marine) derived from the San Gabriel Mountains. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontological resources. As discussed in the City’s General Plan EIR, although Quaternary old alluvial deposits (such as those underlying the project area) in general have the potential to yield fossils, the paleontological sensitivity in these areas of the City is considered low due to their proximity to the mountains to the north. Since the older Quaternary alluvial sediments are close to the sediment source, the uppermost layers of these deposits are likely too coarse grained to preserve fossils. Therefore, the project is not expected to encounter a unique paleontological resource or unique geologic feature.

#### 4.8 GREENHOUSE GAS EMISSIONS

Would the project:

a. *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

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**WHY?** The project will generate Carbon Dioxide, which is the primary component of Greenhouse gases (GHG). Thus, the project will contribute to global warming as described by the Intergovernmental Panel on Climate Change. In total, the project will generate 1,667.47 metric tons of CO<sub>2</sub> during construction<sup>38</sup> and 1,641.60 metric tons per year for operations, refer to Appendix B, Combined CalEEMod Output Files.

The City of Pasadena developed the Climate Action Plan (CAP) as a qualified greenhouse gas (GHG) emissions reduction plan in accordance with *CEQA Guidelines* Section 15183.5. The project applicant submitted a *Climate Action Plan Consistency Checklist Application Form* in order to demonstrate that the proposed project is consistent with the Pasadena CAP by incorporating applicable actions intended to ensure that the project contributes its fair share to the City’s cumulative GHG reduction goals. Proposed

<sup>38</sup> Construction emissions amortized over thirty years is approximately 55.57 MT CO<sub>2</sub>e/year.



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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sustainable development actions from the submitted *CAP Consistency Checklist* are listed and explained below in Tables 4.8-1 and 4.8-2. Review of the Checklist demonstrates that the proposed project would have a less than significant GHG impact.

b. *Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

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**WHY?** The project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The project is consistent with the General Plan and Zoning Code and is not a use that is a significant source of GHG emissions because it is consistent with the City's CAP, as set forth below. The project would not conflict with AB 32, SB32, or the Final 2017 Scoping Plan; therefore, there would be no impacts related to conflict with applicable plans.

## CITY OF PASADENA'S CLIMATE ACTION PLAN

The City's CAP requires projects to meet at least 11 GHG Reduction Strategies, including six mandatory measures, one action in Energy Efficiency and Conservation, one action in the Sustainable Mobility and Land Use category, and three additional measures. The proposed project will implement 13 actions from the City's CAP, see **Table 4.8-1, CAP Action Measures**.

**Table 4.8-1  
CAP Action Measures**

GHG Reduction Strategy	Sustainable Development Actions	Yes	N/A
<b>Mandatory Measures</b>			
<b>T-1.2:</b> Continue to improve bicycle and pedestrian safety	<b>Bicycle Storage:</b> Does the project provide bicycle storage lockers, racks, or other bicycle storage facilities for residents/employees? Check "N/A" only if the project does not include residents or employees.	X	
<b>T-3.1:</b> Decrease annual commuter miles traveled by single occupancy vehicles	<b>Transportation Demand Management (TDM):</b> Does the project include a TDM plan? A TDM plan is required for the following projects: multifamily residential development that are 100 or more units; mixed-use developments with 50 or more residential units or 50,000 square feet or more of non-residential development; or non-residential projects which exceed 75,000 square feet. If applicable, please submit the TDM plan for review.	X	
<b>T-4.1:</b> Expand the availability and use of alternative fuel vehicles and fueling infrastructure	<b>Alternative Vehicle Fueling Wiring:</b> For projects with more than three parking spaces, does the project provide wiring for at least one 240V Type II electric car charger? Please include specifications on the project plans. Check "N/A" only if the project does not include more than three parking spaces.	X	
<b>E-1.2:</b> Encourage the use of energy conservation devices and passive design concepts that make use of the natural climate to increase energy efficiency	<b>Passive Design Features:</b> Does the project utilize passive design techniques such as awnings or overhangs on the east, west, and south facing windows which block the high summer sun but allow in low winter sun? Please include specifications on the project plans.	X	

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GHG Reduction Strategy		Sustainable Development Actions		Yes	N/A
WC-1.1: Reduce potable water usage throughout Pasadena	Irrigation Efficiency: Will the project utilize drought tolerant landscaping and/or drip irrigation and/or weather controllers to reduce outdoor water use? Please include specifications on the project plans. Check "N/A" only if the project does not include any landscaping.			X	
WR-1.1: Continue to reduce solid waste and landfill GHG emissions	Facilitate Recycling: Does the project include a space for separate trash and recycling bins as well as provide information signage/handouts for residents/employees outlining materials to be recycled? Please include specifications on the project plans.			X	
Energy Efficiency and Conservation (select a minimum of one action)					
E-1.1: Increase energy efficiency requirements of new buildings to perform better than 2016 Title 24 Standards	Zero-Net Energy (ZNE): Does the project generate 100% of electricity required on site? ZNE calculations must be provided.				X
E-1.1: Increase energy efficiency requirements of new buildings to perform better than 2016 Title 24 Standards	Energy Efficiency (Exceed 2016 Title 24): Does the project exceed the 2016 Title 24 Efficiency Standards by at least 5%? Please include Title 24 energy model.			X	
E-4.1: Increase city-wide use of carbon-neutral energy by encouraging and/or supporting carbon-neutral technologies	Renewable Energy: Does the project generate at least 60% of the building's projected electricity needs through renewable energy? Please include specifications on the project plans.				X
Sustainable Mobility and Land Use (select a minimum of one action)					
T-1.1: Continue to expand Pasadena's bicycle and pedestrian network	End-of-Trip Bicycle Facilities (Commercial Development): Does the project provide at least one shower for every 50 employees? Please include these specifications on the project plans.			X	
T-1.1: Continue to expand Pasadena's bicycle and pedestrian network	Bike Share: Does the project include a bike share station? Please include these specifications on the project plans.				X
T-3.1: Decrease annual commuter miles traveled by single occupancy vehicles	Car Sharing: Does the project provide/facilitate car sharing by providing a designated car share space on or within the immediate vicinity of the project site? Examples of car share options include ZipCar, PitCarz, and Getaround. Please include these specifications on the project plans.				X
T-3.1: Decrease annual commuter miles traveled by single occupancy vehicles	Park De-Coupling: Does the project separate the cost of parking from the cost of commercial space and/or residential housing by charging for each individually? Please include these specifications on the project plans.			X	
T-4.1: Expand the availability and use of alternative fuel vehicles and fueling infrastructure	Alternative Vehicle Fueling Infrastructure: Does the proposed project include functioning 240V Type II electric car chargers at 3% of parking spaces (at least one charger) AND conduit to allow for future charger installation to 25% of spaces?			X	
T-5.1: Facilitate high density, mixed-use, transit-oriented, and infill development	Transit Oriented Development: Is the project located within 0.25 mile of a major transit stop as defined in the Zoning Code. Please include a map outlining the nearest transit stop.			X	
T-6.1: Reduce GHG emissions from heavy-duty construction equipment and vehicles	Reduce GHG emissions from heavy-construction equipment: Will the project utilize at least 30% alternative fueled construction equipment (by pieces of equipment) and implement an equipment idling limit of 3 minutes? Please provide idling limit plan including implementation strategies aligning with the total pieces of equipment and those utilizing alternative fuels.				X
Water Conservation					
WC-1.1: Reduce potable water usage throughout Pasadena	Indoor Water Efficiency: Will the project achieve at least a 35% reduction in indoor water use per the LEED V4 Indoor Water Use Reduction Calculator? Please attach the calculator output.				X

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact	
GHG Reduction Strategy		Sustainable Development Actions		Yes	N/A
WC-2.1: Increase access to and use of non-potable water	Rainwater Capture and Reuse: Does the project utilize a rainwater capture and reuse system to reduce the amount of potable water consumed on site? Please include these specifications on the project plans.			X	
WC-2.1: Increase access to and use of non-potable water	Indoor & Outdoor Recycled Water: Will the project be plumbed to utilize recycled water for either indoor or outdoor water use? Please include these specifications on the project plans.			X	
WC-2.1: Increase access to and use of non-potable water	Greywater: Will the project be plumbed to take advantage of greywater produced on site such as a laundry to landscape system or another on-site water reuse system? Please include these specifications on project plans.			X	
WC-3.1: Improve storm water to slow, sink, and treat water run-off, recharge groundwater, and improve water quality	Permeable Surfaces: Is at least 30% of the hardscape (e.g., surface parking lots, walkways, patios, etc.) permeable to allow infiltration? Please include these specifications on the project plans.			X	
WC-3.1: Improve storm water to slow, sink, and treat water run-off, recharge groundwater, and improve water quality	Stormwater Capture: Is the project designed to retain stormwater resulting from the 95th percentile, 24-hour rain event as defined by the Los Angeles County 95th percentile precipitation isohyetal map? Please provide the engineered stormwater retention plan with the project plans.		X		
Waste Conservation					
WR-1.1: Continue to reduce solid waste and landfill GHG emissions	Recycled Materials: Does the project utilize building materials and furnishings with at least 50% ((re- or post-consumer) recycled content or products which are designed for reuse? At a minimum, project must show at least 10% of the material by cost meets the recycled content requirements? Please submit the plan for review.			X	
WR-3.1: Implement a city-wide composting program to limit the amount of organic material entering landfills	On-Site Composting: Does the project include an area specifically designated for on-site composting? Please include these specifications on the project plans.			X	
Urban Greening					
UG-1.1: Continue to preserve, enhance, and acquire additional green space throughout Pasadena to improve carbon sequestration, reduce the urban heat-island effect, and increase opportunities for active recreation	Greenspace: Does the project include at least 500 sq. ft. of public use greenspace (landscaped yards, parklets, rooftop garden, etc.)? At a minimum, 50% of the required greenspace must include softscape landscaping (e.g., trees, plants, grass, etc.).			X	
UG-2.1: Continue to protect existing trees and plant new ones to improve and ensure viability of Pasadena's urban forest	Trees: Does the project result in a net gain of trees? Please include these specifications on the project plans.		X		

Source: Architectural Resources Group, Central Park Apartments 86 S. Fair Oaks, Pasadena, CA. Climate Action Plan Consistency Submittal.

The City's CAP requires the proposed project to provide supporting information describing how each selected Sustainable Development Action would be implemented in the proposed project. **Table 4.8-2, Project Implementation of the CAP Actions** details project consistency with the thirteen actions identified within **Table 4.8-1**. The *CAP Consistency Submittal* prepared by the Architectural Resources Group, included in **Appendix D** of this SCEA, provides additional information regarding project consistency with these measures.

**Potentially Significant Impact**      **Significant Unless Mitigation is Incorporated**      **Less Than Significant Impact**      **No Impact**

**Table 4.8-2  
Project Implementation of the CAP Actions**

<b>Sustainable Development Action</b>	<b>Description of Project Implementation</b>
<b>Mandatory Measures</b>	
<b>T-1.2:</b> Bicycle Storage	The project provides bicycle storage facilities for residents and employees. A Class 1 Bicycle Facility (i.e., weather-protected) is located within the building and is accessible to residents. A Class 2 Bicycle Facility (standard bike rack) is provided for non-residents and employees.
<b>T-3.1:</b> Transportation Demand Management	Since the project is a mixed-use development with 84 residential units, a Transportation Demand Management (TDM) plan is required to be prepared and implemented pursuant to Section 10.64.020 of the Pasadena Municipal Code. A TDM plan has been drafted and submitted to the City for review.
<b>T-4.1:</b> Alternative Vehicle Fueling Wiring	Three percent of on-site parking spaces (approximately six spaces) will accommodate 240V Type II electric car chargers for alternative vehicle fueling (AVF). Up to 25 percent of spaces (Approximately 49 spaces) will be capable of supporting such charging in the future.
<b>E-1.2:</b> Passive Design Features	The project utilizes a number of passive design techniques to increase energy efficiency. Residential units will have operable, dual-pane windows that provide both daylighting and ventilation. Every unit will also have its own occupiable exterior balcony; these balconies will typically be stacked to shade apartment glazing from excessive solar exposure. Additional fixed canopies and facade overhangs will further mitigate solar heat gain on the east, west, and south facades. Retail spaces will be provided with extensive storefront glazing, also shaded by canopies. Building surface materials are generally to be light-colored to reduce heat absorption. Paved site surfaces will be offset with significant planted areas; new and relocated existing site trees will provide extensive shading.
<b>WC-1.1:</b> Irrigation Efficiency	More than 75 percent of planting material utilized in this project is identified by Water Use Classification of Landscape Species (WUCOLS) as needing "Low" or "Very Low" amounts of irrigation water, indicating that an overwhelming majority of plants will be drought tolerant. The project will use a drip irrigation system with a weather-based irrigation controller.
<b>WR-1.1:</b> Facilitate Recycling	The project includes separate trash and recycling bins. The first parking level (P1) features two rooms that include space for separate trash and recycling bins. Informational signage will be displayed to clearly indicate which materials can be recycled to educate residents, employees, and visitors to the building about proper refuse disposal procedures.
<b>Selective Actions</b>	
<b>E-1.1:</b> Energy Efficiency (Exceed 2016 Title 24)	The project is projected to exceed the 2016 Title 24 Efficiency Standards by 11.3 percent. A Title 24 energy model has been prepared to demonstrate the project's energy efficiency features. (Included in <b>Appendix E</b> of this SCEA)
<b>E-1.1:</b> End-of-Trip Bicycle Facilities	Shower facilities for bicyclists will be located inside of the building, in proximity to the Class 1 Bicycle Facility that is described in the response for Sustainable Development Action T-1.2 (Bicycle Storage). Approximately 30 employees are projected based upon the commercial program. Two showers will be available for employees of the ground floor restaurant and retail tenants. The project also includes four live-work units with bathroom facilities. The project thus exceeds the one shower per 50 employees standards.
<b>T-3.1:</b> Parking De-Coupling	On-site parking for residential tenants at the Central Park Apartments will be de-coupled from the lease agreements to remove an incentive for single-occupancy vehicle usage. Parking spaces will be licensed or leased via separate agreements with building management, and a fee charged per parking space. Approximately 53 parking spaces will be available to tenants of the Hotel Green located next door as "joint parking". Those parking spaces will likely not be de-coupled due to existing lease agreements.
<b>T-3.1:</b> Transportation Demand Management	A Transportation Demand Management (TDM) plan is required by the City of Pasadena as the mixed-use project exceeds 50 dwelling units. This feature is not being added to the total number of selective actions that are associated with this project. A TDM plan has been drafted and submitted to the City for review.
<b>T-4.1:</b> Alternative Vehicle Fueling Infrastructure	The project includes six parking spaces with functioning 240V Type II wiring for alternative vehicle fueling (AVF), which is equivalent to 3 percent of on-site parking spaces. The project also includes an estimated 49 parking spaces with conduit to support future alternative vehicle parking (F-AVF) spaces, which is equivalent to 25 percent of on-site parking spaces.
<b>T-5.1:</b> Transit Oriented Development	The project site is located within a 0.25-mile radius of the Del Mar Metro Station and 0.4 miles of the Memorial Park Station, which are both identified in the Zoning Code as major transit stops.

Potentially Significant Impact      Significant Unless Mitigation is Incorporated      Less Than Significant Impact      No Impact

Sustainable Development Action	Description of Project Implementation
<b>WC-3.1</b> Stormwater Capture	The project is designed to retain stormwater resulting from the 95th percentile, 24-hour rain event per the Los Angeles County 95th percentile precipitation isohyetal map. Two infiltration drywells are proposed below the structure to capture and infiltrate the 95th percentile storm volume generated onsite. Roof drainage and runoff from all site areas will be collected and routed to the drywells, where it will infiltrate into the soil to promote groundwater recharge. Additional storage upstream of proposed drywells will be required for 95th percentile storm. Solids will be removed from stormwater run-off through settlement in the proposed drywell chambers.
<b>UG-2.1:</b> Trees	The project results in a net gain of trees. Nineteen trees are currently located on the property, and 38 trees are identified on the proposed landscape plan associated with the project, resulting in a net gain of 19 trees.

Source: Architectural Resources Group, Central Park Apartments 86 S. Fair Oaks, Pasadena, CA. Climate Action Plan Consistency Submittal.

## FINAL 2017 SCOPING PLAN UPDATE

CARB issued the Final 2017 Scoping Plan Update in November 2017 and establishes emissions reductions strategies necessary to meet SB 32's 2030 reduction goals. **Table 4.8-3, Project Consistency with Applicable 2017 Scoping Plan Measures** identifies the Scoping Plan policies that are applicable to the proposed project, demonstrating project consistency.

**Table 4.8-3**  
**Project Consistency with Applicable 2017 Scoping Plan Measures**

Measures	Project Consistency
Implement SB 350 by 2030:	
Increase the Renewables Portfolio Standard to 50 percent of retail sales by 2030 and grid reliability	<b>Not Applicable.</b> The measure is not related to development projects but intended for energy providers.
Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	<b>Not Applicable.</b> This measure is directed towards policymakers, not development projects.
Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in the IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions planning targets through a combination of measures as described in IRPs.	<b>Consistent.</b> The project is required to meet CALGreen building standards by including measures designed to reduce energy consumption.
Implement Mobile Source Strategy (Cleaner Technology and Fuels):	
Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	<b>Consistent.</b> The project site is located within a 0.25-mile radius of the Del Mar Metro Station and 0.4 miles of the Memorial Park Station. Thus, this would reduce VMT traveled, promote alternatives to driving, and aim to reduce GHG emissions.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road use, parking pricing, transit discounts).	<b>Not Applicable.</b> This measure is directed towards policymakers, not development projects. However, the project is within 0.25-miles of the Del Mar Metro Station and 0.4 miles of the Memorial Park Station, which would lead to a reduction in VMT.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
Measures		Project Consistency	
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.		<b>Not Applicable.</b> This measure is directed towards CARB, CalRecycle, CDFA, SWRCB, and local air districts. However, the statewide policy goals of 75 percent of solid waste generated be source reduce, recycled, or composted by 2020 under AB 341. Since the project would be operational after this year, the project's waste collection service would be required to be compliant with this waste reduction.	
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.		<b>Consistent.</b> The project incorporates measures that will reduce GHG emissions from project energy, indoor water, and outdoor water use. Additionally, due to project proximity to the Del Mar and Memorial Park Metro stations, the project will reduce VMT and associated transportation emissions.	
<i>Source: CARB. California's 2017 Climate Change Scoping Plan.</i>			

## SCAG RTP/SCS

### 2016-2040 RTP/SCS

At the regional level, the 2016-2040 RTP/SCS defines strategies for reducing GHGs. In order to assess the project's potential to conflict with the RTP/SCS, this section analyzes the project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plan and would not preclude the attainment of their primary goals. **Table 4.8-4, Project Consistency with SCAG 2016-2040 RTP/SCS** demonstrates the project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. Therefore, the project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

**Table 4.8-4**  
**Project Consistency with SCAG 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party	Consistency Analysis
<b>Land Use Strategies</b>		
Reflect the changing population and demands, including combatting gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	<b>Consistent.</b> The proposed project includes the development of a mixed-use development on a site with an existing surface parking lot. The project would increase the housing supply, and would not displace any existing residents.
Focus new growth around transit.	Local Jurisdictions	<b>Consistent.</b> The project site is located within a 0.25-mile radius of the Del Mar Metro Station and 0.4 miles of the Memorial Park Station.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG Local Jurisdictions	<b>Consistent.</b> The project site is located within a 0.25-mile radius of the Del Mar Metro Station and 0.4 miles of the Memorial Park Station.

	Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
Actions and Strategies	Responsible Party	Consistency Analysis		
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the proposed project would not interfere with such policymaking and would be consistent with those policy objectives.		
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	<b>Consistent.</b> The project site is currently developed with a surface parking lot; therefore, the proposed project would not be constructed on any natural or farm lands.		
Transportation Strategies				
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on investing in the maintenance of our existing transportation system, the proposed project would not interfere with such policymaking.		
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	<b>Consistent.</b> The proposed project will minimize congestion impacts on the region because of its proximity to public transit and the implementation of a transportation demand management (TDM) program.		
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy aims to improve the safety of the transportation system and protect users from security threats, the proposed project would not interfere with such policymaking.		
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The proposed project would not interfere with this larger goal of investing in the transportation system.		
Technological Innovation and 21st Century Transportation				
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the project would include electric vehicle charging infrastructure.		
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the project would include electric vehicle charging infrastructure.		
Implement shared mobility programs.	SCAG Local Jurisdictions	<b>Not Applicable.</b> While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the proposed project would not interfere with these programs.		

**Source:** Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; and Impact Sciences, 2019.

## CONNECT SOCAL PLAN

On May 7, 2020, SCAG's Regional Council adopted Connect SoCal (2020-2045 RTP/SCS) for federal transportation conformity purposes only. On September 3, 2020, the Regional Council formally adopted the Connect SoCal plan to provide a roadmap to expand transportation options, improve air quality and bolster Southern California's long-term economic viability.

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Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. **Table 4.8-5, Project Consistency with SCAG Connect SoCal** demonstrates the project's consistency with the major goals set forth in Connect SoCal Plan. Therefore, the project would be consistent with the GHG reduction related actions and strategies contained in Connect SoCal.

**Table 4.8-5  
Project Consistency with SCAG Connect SoCal**

<b>Measures</b>	<b>Consistency Analysis</b>
Encourage regional economic prosperity and global competitiveness.	<b>Not Applicable.</b> This strategy calls on encouraging regional economic prosperity and global competitiveness. The proposed project would not interfere with such policymaking.
Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>Consistent.</b> The project site is located within 0.25-mile radius of the Del Mar Metro Station and 0.4 miles of the Memorial Park Station.
Enhance the preservation, security, and resilience of the transportation system.	<b>Not Applicable.</b> While this strategy calls on enhancing the preservation, security, and resilience of the transportation system, the proposed project would not interfere with such policymaking.
Increase person and goods movements and travel choices within the transportation system.	<b>Not Applicable.</b> This strategy calls on SCAG to increase person and goods movement and travel choices across the transportation system. The proposed project would not interfere with this goal.
Reduce greenhouse gas emissions and improve air quality.	<b>Consistent.</b> The Project would result in criteria air pollutant and GHG emissions during construction and operation. However, emissions would not exceed the SCAQMD significance thresholds and would be consistent with the City's CAP.
Support healthy and equitable communities.	<b>Not Applicable.</b> This strategy calls on supporting healthy and equitable communities. The proposed project would not interfere with this goal.
Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<b>Not Applicable.</b> This goal is directed towards SCAG and does not apply to individual development projects. The proposed project would minimize congestion impacts on the region because of its proximity to public transit and the implementation of a transportation demand management (TDM) program.
Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<b>Not Applicable.</b> This strategy calls on SCAG to use new transportation technologies and data-driven solutions to increase travel efficiency. The proposed project would not interfere with this goal.
Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<b>Consistent.</b> The proposed project would construct 84 apartment units and 4 work/live units within a 0.25-mile radius of the Del Mar Metro Station and 0.4 miles of the Memorial Park Station.
Promote conservation of natural and agricultural lands and restoration of habitats.	<b>Not Applicable.</b> This strategy calls on SCAG to promote the conservation of natural and agricultural land and the restoration of habitats. The proposed project site currently serves as a surface parking lot. Therefore, the proposed project would not interfere with this goal.

Source: Southern California Association of Governments; Connect SoCal; and Impact Sciences, 2020.



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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#### 4.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- a. *Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?*

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**WHY?** The project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers and cleaning agents required for normal maintenance of the structure and landscaping. The project must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. Further, there are no records of the site having been used for storage of hazardous materials.

- 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?)*

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**WHY?** The project does not involve hazardous materials. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, which could release hazardous material.

- c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

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**WHY?** The project does not involve hazardous emissions or the handling of hazardous materials, substance, or waste and is not within one-quarter mile of an existing or proposed school; the closest schools are the Waverly School and St. Andrews Elementary School, both of which are approximately one-half mile away. Therefore, the proposed project would have no hazardous material related impacts to schools.

- d. *Be located on a site which 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?*

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**WHY?** The project site is not located on the State of California Hazardous Waste and Substances Sites List of sites published by California Environmental Protection Agency (CAL/EPA). The site was formerly used as a surface parking lot for the adjacent hotel, which is not a land use associated with hazardous materials. Searches conducted using the California State Water Resources Control Board Geotracker and the Department of Toxic Substances Control EnviroStor did not reveal any potentially hazardous sites within

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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1000 feet of the project site. The site is not known or anticipated to have been contaminated with hazardous materials and no hazardous material storage facilities are known to exist onsite.

- 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 or excessive noise for people residing or working in the project area?*

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**WHY?** The project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest public use airport is the Hollywood/Burbank (Bob Hope) Airport in Burbank, which is operated by a Joint Powers Authority with representatives from the Cities of Burbank, Glendale and Pasadena. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of an airport and would have no associated impacts.

- f. *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

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**WHY?** The City of Pasadena maintains a citywide emergency response plan, which goes into effect at the onset of a major disaster (e.g., a major earthquake). The Pasadena Fire Department maintains the disaster plan. In case of a disaster, the Fire Department is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency. The City has pre-planned evacuation routes for dam inundation areas associated with Devil's Gate Dam, Eaton Wash, and the Jones Reservoir.

The construction and operation of the proposed project would not place any permanent or temporary physical barriers on any existing public streets. To ensure compliance with zoning, building and fire codes, the applicant is required to submit appropriate plans for plan review prior to the issuance of a building permit. Adherence to these requirements ensures that the project will not have a significant impact on emergency response and evacuation plans.

- g. *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

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**WHY?** As shown on Plate P-2 of the 2002 Safety Element, the project site is not in an area of moderate or very high fire hazard. In addition, the project site is surrounded by urban development and not adjacent to any wildlands. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires, and the project would have no associated impacts.

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#### 4.10 HYDROLOGY AND WATER QUALITY

Would the project:

- a. *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

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**WHY?** Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California's Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

Pasadena is within the greater Los Angeles River watershed, and thus, within the jurisdiction of the Los Angeles RWQCB. The Los Angeles RWQCB adopted water quality objectives in its Stormwater Quality Management Plan (SQMP). This SQMP is designed to ensure stormwater achieves compliance with receiving water limitations. Thus, stormwater generated by a development that complies with the SQMP does not exceed the limitations of receiving waters, and thus does not exceed water quality standards.

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollution Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated Cities therein, including the City of Pasadena, obtained an MS4 from the Los Angeles RWQCB, adopted in 2012 and most recently amended in 2018. Under this MS4, each permitted municipality is required to implement the SQMP.

In accordance with the County-wide MS4 permit, the permit establishes new LID requirements for new development and redevelopment projects. Development projects which require the design and implementation of post-construction controls to mitigate storm water pollution, prior to completion of a project. The MS4 Permit requires for projects to retain on-site the Stormwater Quality Design Volume (SWQDV) defined as the runoff from:

- The 0.75-inch, 24-hour rain event (not applicable for Pasadena); or
- The 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map. Pasadena has a range of 1.0-1.2 inch per hour according to the map.

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Activities associated with operation of the proposed project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the proposed project must comply with water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the proposed project's approved USMP. Compliance with existing regulations and the approved USMP would reduce the potential for the proposed project to exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts, and operational water quality impacts would therefore be less than significant.

- b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

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**WHY?** The project would not install any groundwater wells, and would not otherwise directly withdraw any groundwater. In addition, there are no known aquifer conditions at the project site or in the surrounding area, which could be intercepted by excavation or development of the project. Therefore, the proposed project would not physically interfere with any groundwater supplies.

The project would use the existing water supply system provided by the Pasadena Department of Water and Power. The source of some of this water supply is ground water, stored in the Raymond Basin. Thus, the project could indirectly withdraw groundwater. However, the proposed water usage would be negligible in comparison to the overall water service provided by the Department of Water and Power. Furthermore, the Pasadena Department of Water and Power, since 2014, has water rights to pump 10,304 Acre-feet per year (AFY).<sup>39</sup> Therefore, the sum of all water that is pumped from the Raymond Basin is regulated so as not to exceed the total operating yield of the basin and not based on demand. The proposed project's minor amount of water use would not result in significant impacts from depletion of groundwater supplies. Under normal operation the project will use approximately 24,261 gallons of water per day (See **Table 4.19-1, Projected Water Use**). The project is designed to retain stormwater resulting from the 95th percentile, 24-hour rain event per the Los Angeles County 95th percentile precipitation isohyetal map. Two infiltration drywells are proposed below the structure to capture and infiltrate the 95th percentile storm volume generated onsite. Roof drainage and runoff from all site areas would be collected and routed to the drywells, where it would infiltrate into the soil to promote groundwater recharge. Additional storage upstream of proposed drywells would be required for 95th percentile storm. Solids would be removed from stormwater

<sup>39</sup> City of Pasadena. Pasadena Department of Water and Power. *2015 Urban Water Management Plan*. Available at: [https://ww5.cityofpasadena.net/water-and-power/wp-content/uploads/sites/54/2017/08/2015\\_Final\\_UWMP.pdf](https://ww5.cityofpasadena.net/water-and-power/wp-content/uploads/sites/54/2017/08/2015_Final_UWMP.pdf)

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run-off through settlement in the proposed drywell chambers. Per the City's Water and Power Department, existing entitlements and sources can serve the proposed project.

Over the past several years, Pasadena Water and Power (PWP) has been impacted by several factors that have restricted local and regional water supply. PWP's groundwater rights in the Raymond Basin have been curtailed in order to mitigate groundwater depletion experienced over the last half century. With respect to imported supplies, a decade-long drought has reduced the ability to replenish regional groundwater supplies; drought conditions in the American southwest have reduced deliveries of water from the Colorado River, and legal and environmental issues have resulted in reduced water deliveries through the State Water Project. The City accounted for these conditions in its current Water Integrated Resources Plan (adopted January, 2011) and Urban Water Management Plan (adopted June, 2016).

The Pasadena Municipal Code Chapter 13.10 establishes thirteen permanent mandatory restrictions on wasteful water use activities. In addition, the State Legislature passed the Water Conservation Act of 2009 which seeks to achieve a 20% statewide reduction in urban per capita water use by December 31, 2020.

In September 2008, Council directed PWP to develop a Comprehensive Water Conservation Plan (CWCP) with a variety of approaches and recommendations for achieving 10%, 20% and 30% reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the CWCP presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10). As a long-term goal, the CWCP presupposes an initial target of reducing per-capita potable water consumption 10% by 2015 and 20% by 2020.

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements began in 2009, as a result of the State's 20x2020 Water Conservation Plan from April 30, 2009 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the 20x2020 Water Conservation Initiative Program.

As a result, to meet these water policy goals, the current project must comply with the Water Conservation Plan and the Water Shortage Procedure Ordinance and the City's goal to meet the 20x2020 goals by submitting a water-conservation plan limiting the water consumption to 80% of its originally anticipated amount. With submission of this plan, the project will not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the City's Water and Power Department and the

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Building Division before the issuance of a building permit. The applicant's irrigation and plumbing plans are also required to comply with the approved water-conservation plan and the city's requirements for landscape irrigation.

The project is also required to adhere to the requirements of the Model Water Efficient Landscape Ordinance which was adopted in 2010 and updated in 2018. This ordinance is a result of State Assembly Bill 1881 (SB1881) which mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. The project must adhere to all applicable provisions on this ordinance which are contained in Title 13 (Utilities and Services) of the Pasadena Municipal Code. The ordinance may require design features that include specific plant types, the use of recycled water for irrigation and/or water features etc. Adherence to the requirements will reduce the amount of water used in the project landscaping and will aid the project in complying with all related water reduction provisions.

- c. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:*
- i. *result in substantial erosion or siltation on-or off-site?*

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**WHY?** The project site is almost entirely covered by impervious surfaces and most of the runoff flows to the local storm drain system during a storm event. The proposed project would decrease the impervious site area. Through the addition of softscape primarily on the ground floor, approximately 87 percent of the site area would be comprised of impervious surfaces. All the runoff associated with the proposed project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils.

The drainage of surface water from the project would be controlled by building regulations and directed towards the City's existing streets, flood control channels, storm drains and catch basins. Prior to the issuance of a building permit, the applicant is required to submit a site drainage plan to the Building Division and the Department of Public Works for review and approval. This required approval ensures that the proposed drainage plan is appropriately designed and that the proposed runoff does not exceed the capacity of the City's storm drain system. The proposed drainage of the site would not channel runoff on exposed soil, would not direct flows over unvegetated soils, and would not otherwise increase the erosion or siltation potential of the site or any downstream areas. Therefore, the proposed project would not result in significant erosion or siltation impacts from changes to drainage patterns.

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ii. result in flooding on-or off-site?

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**WHY?** The project site is currently developed with a surface parking lot and a commercial billboard. The project would not substantially change the site's drainage patterns and would not alter a discernable drainage course resulting in flooding. The proposed project would be required to submit a drainage plan to the Building Division and the Department of Public Works for review and approval. Compliance with the City's drainage plan review and approval process would reduce the likelihood that the proposed project would lead to on-site or off-site flooding.

Since the project would not involve alteration of a discernable watercourse and post-development runoff discharge rates are required to not exceed predevelopment rates, the proposed project would not have the potential to alter drainage patterns or increase runoff such that flooding would occur. Therefore, impacts would be less than significant.

iii. 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?

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**WHY?** As noted above, the project site is generally flat and is currently occupied by a surface parking lot. Project implementation would result in similar drainage patterns as existing conditions, since the majority of the site would remain impervious. As such, the amount of stormwater runoff from the site is not expected to increase, and the project is, therefore, not expected to exceed the capacity of existing or planned stormwater drainage systems. As discussed above, the proposed project would be required to submit a drainage plan to the Building Division and the Public Works Department for review and approval. The City's drainage plan review and approval process would ensure that the proposed project would not create a new source of runoff such that the capacity of the City's stormwater drainage system would be exceeded.

The project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the County-wide MS4 permit, and the project would be required to implement best management practices (BMPs), consistent with the City's Stormwater Management and Discharge Control ordinance in P.M.C. Chapter 8.70, to reduce stormwater pollutants to the maximum extent practicable. For these reasons, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. Impacts would be less than significant.

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iv. *impede or redirect flood flows?*

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**WHY?** The drainage of surface water from the project would be controlled by building regulations and would be directed towards the City's existing streets, storm drains, and catch basins. As discussed above, the project would not increase the amount of impervious land of the site and, therefore, would not increase stormwater runoff from the site. The project would not impede or redirect flood flows.

d. *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

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**WHY?** The City is not located near enough to any inland bodies of water or the Pacific Ocean to be inundated by either a seiche or tsunami. No portions of the City of Pasadena are within a 100-year floodplain identified by FEMA. In addition, according to the City's Dam Failure Inundation Map (Plate P-2 of the 2002 Safety Element of the City's General Plan) the project is not located in a dam inundation area. Therefore, no impacts would occur.

e. *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

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**WHY?** As discussed above, the proposed project would implement the BMPs recommended by the City's Stormwater Management and Discharge Control ordinance ((P.M.C. Chapter 8.70) in order to ensure stormwater pollutants do not substantially degrade water quality. Further, the City of Pasadena has adjudicated groundwater rights from the Raymond Basin. For this reason, the City does not have a sustainable groundwater management plan as it is not required for adjudicated groundwater basins.

Additionally, the project has the potential to generate short-term water pollutants during construction, including sediment, trash, construction materials, and equipment fluids. The County-wide MS-4 permit requires construction sites to have BMPs in place to reduce the potential for construction-induced water pollutant impacts. These BMPs include methods to prevent contaminated construction site stormwater from entering the drainage system and preventing construction-induced contaminants from entering the drainage system. The MS4 identified the following minimum requirements for construction sites in Los Angeles County:

- Sediment generated on the project site shall be retained using adequate treatment control or structural BMPs.



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- Construction-related materials, wastes, spills, or residues shall be retained at the project site to avoid discharge to streets, drainage facilities, receiving waters, or adjacent properties by wind or runoff.
- Non-stormwater runoff from equipment and vehicle washing and any other activity shall be contained at the project site.
- Erosion from slopes and channels shall be controlled by implementing an effective combination of BMPs, such as the limiting of a grading scheduled during the wet season; inspecting graded areas during rain events; planting and maintenance of vegetation on slopes; and covering slopes that may be susceptible to erosion.

As the proposed project site is less than one acre in size (0.74 acres), it would not require the preparation of a General Construction Activity Stormwater Permit (GCASWP) or a Storm Water Pollution Prevention Plan (SWPPP).

However, as per City code and regulations, all projects under construction must contain all sediment and spills on-site. The implementation of the following standard BMPs would minimize any chance that erosive soils, sediment or other construction spills or debris would impact water quality:

1. Every effort should be made to eliminate the discharge of non-stormwater from the project site at all times.
2. Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheet-flow, swales, area drains, natural drainage courses, or wind.
3. Stockpiles of earth and other construction-related materials must be protected from being transported from the site by the forces of wind or water.
4. Fuels, oils, solvents, and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system.
5. Excess or waste concrete may not be washed into the public right-of-way or any other drainage system. Provisions shall be made to retain concrete wastes on site until they can be disposed of as solid waste.

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6. Trash and construction-related solid waste must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind.

Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public right-of-way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means.

Therefore, the project would comply with applicable water quality control plans. Additionally, the project site would be constructed on a site previously developed with a surface parking lot and would not increase the amount of impervious surface. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of any other water quality control plans or sustainable groundwater management plans.

#### 4.11 LAND USE AND PLANNING

Would the project:

- a. *Physically divide an established community?*

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**WHY?** The project would not physically divide an existing community, as the site is surrounded by similar development on all sides, and the project consists of an infill development within an urbanized area. No adverse impact would result.

- b. *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

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**WHY?** The project is consistent with both the CD-1 zoning designation and the High-Mixed Use General Plan Land Use Designation in the adopted 2015 Land Use Element.

#### 4.12 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?*

☐ ☐ ☐ ☒

**WHY?** No active mining operations exist in the City of Pasadena. There are two areas in Pasadena that may contain mineral resources. These two areas are Eaton Wash, which, was formerly mined for sand and

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gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate. The project is not near these areas. Therefore, the project will not result in an impact.

- 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?*

☐ ☐ ☐ ☒

**WHY?** The City's 2015 General Plan Land Use Element does not identify any mineral recovery sites within the City. Furthermore, there are no mineral-resource recovery sites shown in the Hahamongna Watershed Park Master Plan; or the 1999 "Aggregate Resources in the Los Angeles Metropolitan Area" map published by the California Department of Conservation, Division of Mines and Geology. No active mining operations exist in the City of Pasadena and mining is not currently allowed within any of the City's designated land uses. Therefore, the proposed project would not have significant impacts from the loss of a locally-important mineral resource recovery site.

#### 4.13 NOISE

Will the project result in:

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

☐ ☐ ☒ ☐

**WHY?** Noise measurements were conducted on the project site and in the project vicinity (**Figure 4.13-1, Noise Monitoring Locations**). Four short-term measurements were conducted with a Larson Davis SoundTrack LxT1 sound level meter placed on a tripod with the microphone positioned approximately 5 feet above the ground. Ambient sound levels were generated dominated by street traffic noise. **Table 4.13-1** presents the result of the ambient, short-term noise measurements.





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**Table 4.13-1**  
**Ambient, Short-term Noise Measurements**

Measurement Location	Date/Time	Leq
Location #1	12/10/2019; 1:23 p.m.	67.9
Location #2	12/10/2019; 1:43 p.m.	68.0
Location #3	12/10/2019; 2:13 p.m.	55.8
Location #4	12/10/2019; 2:31 p.m.	57.3

*Source Impact Sciences, December 2019*

Based on the results of the ambient noise measurements, it was determined that transportation related noise sources are the primary contributor to the noise environment in each of the monitoring locations.

## CONSTRUCTION IMPACTS

The project would generate short-term noise due to construction activities. However, the project would adhere to City regulations governing hours of construction, noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (Chapter 9.36 of the Pasadena Municipal Code). In accordance with these regulations, construction noise would be limited to normal working hours (7 a.m. to 7 p.m. Monday through Friday, 8 a.m. to 5 p.m. on Saturday, in or within 500 feet of a residential area). A construction related traffic plan is also required to ensure that truck routes for transportation of materials and equipment are established with consideration for sensitive uses in the neighborhood. A traffic and parking plan for the construction phase would be submitted for approval to the Traffic Engineer in the Transportation Department prior to the issuance of any permits. Therefore, adhering to established City regulations would ensure that the project would not generate noise levels in excess of standards.

In this case, construction of the proposed project would involve the use of heavy construction equipment within close proximity of residences, including those on adjacent parcels, and as a result, there would be a potential for adverse impacts in the event of non-compliance with the City's noise regulations.

Construction noise levels vary from hour-to-hour and day-to-day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor. Construction of the proposed project would generate noise that could expose nearby receptors to elevated noise levels that may disrupt communication and routine activities. The magnitude of the impact would depend on the type of construction activity, equipment, duration of the construction, distance between the noise source and receiver, and intervening structures. As noted above, section 9.36.080 of the Pasadena Municipal Code requires that construction equipment noise not exceed 85 dB(A) at 100 feet. **Table 4.13-2** lists the



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construction equipment that would be used for the project for various construction phases and their noise levels for a reference receptor at 100 feet.

**Table 4.13-2**  
**Construction Equipment List Noise Emission Levels**

Equipment Description	Impact Device?	Acoustical Use Factor (%)	Spec 721.560 Lmax @ 50 ft (dBA, slow)	Actual Measured Lmax @50ft (dBA, slow)	Calculated Lmax @100 ft (dBA)
Excavator	No	40	n/a	80.7	74.7
Concrete Saw	No	20	n/a	89.6	83.6
All Other Equipment > 5 HP	No	50	85	n/a	79
Front End Loader	No	40	n/a	79.1	73.1
Drill Rig Truck	No	20	n/a	79.1	73.1
Tractor	No	40	84		78
Backhoe	No	40	n/a	77.6	71.5
Crane	No	16	n/a	80.6	74.5
Dozer	No	40	n/a	81.7	75.6
Paver	No	50	n/a	77.2	71.2
Roller	No	20	n/a	80	74

Source: Federal Highway Administration. *Construction Noise Handbook*.  
*Roadway Construction Noise Model*.

As shown above in **Table 4.13-2**, the loudest single piece of construction equipment would be anticipated to have a maximum value of 83.6 dBA at 100 feet. All other anticipated equipment to be used for the project would have a lower noise level. Therefore, the project would comply with section 9.36.080 of the Pasadena Municipal Code and impacts from construction equipment noise would be less than significant.

Construction haul trucks would generate noise off-site during site preparation and construction. This would include removal of materials from the project site, including the export of cut-and-fill materials, removal of asphalt, base materials, and demolished materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase by 3 dB(A) or greater at any noise sensitive land use. Studies have shown that a 3 dB(A) increase in sound level pressure is barely detectable by the human ear. A 3 dB(A) increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.<sup>40</sup> The City of Pasadena's Transportation Data Management System shows that the street

<sup>40</sup> California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol*. September 2013.

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segment south of the intersection of Fair Oaks Avenue and Green Street has a traffic volume of approximately 1,354 vehicles during the A.M. peak hour, and 1,400 vehicles during the P.M. peak hour.<sup>41</sup> The grading period would have approximately 5,688 hauling trips (including trips to and from the site) over a 130 day period, averaging about 44 trips per day. Assuming that these hauling trips would take place during an 8-hour work day period., an average of approximately 6 hauling trips per hour would occur. Though the addition of haul trucks would alter the fleet mix of the anticipated haul route, their addition to local roadways would account for 0.44 percent of the A.M. peak hour traffic volume and 0.43 percent of the P.M. peak hour traffic volume. Since it would take a doubling of roadway traffic volume to increase noise levels by 3 dB(A), the addition of haul trucks from the project would not increase traffic to levels capable of producing 3 dB(A) ambient noise increases and there would be no perceptible increase in noise due to the addition of haul trucks. However, trucks accessing the project site, while not significantly increasing ambient traffic noise levels, have the potential to instantaneously increase noise levels as each truck passes nearby sensitive receptors (e.g., an empty truck hitting a pothole, or the application of air brakes near sensitive land uses, etc.). These temporary instantaneous noise level increases may reach a maximum range of approximately 76 to 88 dB(A) at 50 feet from the source.<sup>42,43</sup> At a reference distance of 100 feet, a noise level of 88 dB(A) at 50 feet would drop to approximately 82 dB(A). This would not exceed the requirements specified in Pasadena Municipal Code section 9.36.080. As a result, temporary haul truck construction noise impacts on ambient noise levels would be considered less than significant.

## OPERATIONAL IMPACTS

The City of Pasadena's Transportation Data Management System shows that Dayton Street between Fair Oaks Avenue and Raymond Avenue has a traffic volume of approximately 70 vehicles during the A.M. peak hour, and 118 vehicles during the P.M. peak hour.<sup>44</sup> It takes a doubling of traffic volume to increase noise levels by 3 dB(A). The project's addition of approximately 52 A.M. peak hour trips and 73 P.M. peak hour trips would not increase in traffic volumes enough to cause a significant audible increase in traffic noise.

The Pasadena Municipal Code requires that noise generated by mechanical equipment not exceed 5 dB(A) above ambient noise levels at adjacent property lines. HVAC equipment is only anticipated to result in an

<sup>41</sup> City of Pasadena, *Transportation Data Management System*. Available at: <https://pasadena.ms2soft.com/tcds/tsearch.asp?loc=Pasadena&mod=>.

<sup>42</sup> Federal Highway Administration, *Highway Construction Noise Handbook*, 2006.

<sup>43</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*. September 2018.

<sup>44</sup> City of Pasadena, *Transportation Data Management System*. Available at: <https://pasadena.ms2soft.com/tcds/tsearch.asp?loc=Pasadena&mod=>.

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increase of 3.1 dB(A). This is below the Pasadena Municipal Code threshold of a 5 dB(A) increase in ambient noise levels. Therefore, on-site HVAC noise would result in a less than significant impact.

Parking noise typically generates noise levels of approximately 60 dB(A) at 50 feet. Parking from the project would occur in subterranean parking. However, as cars enter the subterranean parking from within the project site, noise generated from parking related impacts may occur at nearby receptors. At approximately 60 feet from the subterranean parking entrance, there would be an increase of approximately 4.5 dB(A) when vehicles enter the parking levels of the project and receptors are exposed to parking noise. This is below the Pasadena Municipal Code recommended threshold of a 5 dB(A) increase in ambient noise levels. Therefore, parking noise would result in a less than significant impact.

*b. Generation of excessive groundborne vibration or groundborne noise levels?*

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**WHY?** The Federal Transit Administration provides ground-borne vibration impact criteria with respect to building damage during construction activities. Peak particle velocity (PPV), expressed in inches per second, is used to measure building vibration damage. Construction vibration damage criteria are assessed based on structural category (e.g. reinforced-concrete, steel, or timber). FTA guidelines consider 0.12 inch/sec PPV to be the significant impact level for buildings extremely susceptible to vibration damage. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines.<sup>45</sup>

Groundborne vibration generated by construction activities associated with the proposed project would affect both on- and off-site sensitive uses located in close proximity to the project site. As shown in **Table 4.13-3, Vibration Source Levels for Construction Equipment**, vibration velocities could range from 0.003 to 0.644 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels (VdB) ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use. It should be noted that pile driving and equivalent methods are prohibited by the Municipal Code.

**Table 4.13-3  
Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69

<sup>45</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*. September 2018.



	Potentially Significant Impact					Significant Unless Mitigation is Incorporated					Less Than Significant Impact					No Impact				
Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)														
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet										
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68										
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61										
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40										

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

The sensitive receptors in Figure 1 are sensitive to noise impacts. However, vibrational impacts can potentially damage buildings that are near the construction site. As such, **Table 4.13-4, Vibration Levels at Off-Site Sensitive Uses from Project Construction - Unmitigated**, shows the vibration velocity and levels that would occur at these nearby buildings and structures during construction at the project site. For clarity, the receptors in Table 4.13-3 are listed as “Vibration Receptors.” The receptors identified to be assessed for vibration impacts are the Green Hotel Apartments (Vibration Receptor #1) located to the north of the project site, the Castle Green (Vibration Receptor #2) located east of the project, a three-story red brick building located at 103-115 South Fair Oaks Avenue (Vibration Receptor #3) located west of the project, and a restaurant building located at 84 South Fair Oaks Avenue (Vibration Receptor #4). Based on the FTA guidance presented in Table 5, a vibration level of 0.12 PPV in/sec is used in this analysis as the threshold to determine potential significant vibration impacts to the existing Green Hotel Apartments, Castle Green, and restaurant building located at 84 South Fair Oaks Avenue.

**Table 4.13-4**  
**Vibration Levels at Off-Site Sensitive Uses from Project Construction - Unmitigated**

Sensitive Uses Off-Site	Distance to Project Site (ft.)	Receptor Significance Threshold PPV (in./sec)	Estimated PPV (in/sec) <sup>a</sup>
Vibration Receptor #1 (Green Hotel Apartments)	20	0.12	0.124
Vibration Receptor #2 (Castle Green) <sup>c</sup>	40	0.12	0.044
Vibration Receptor #3 (103-115 South Fair Oaks Avenue)	80	0.5	0.016
Vibration Receptor #4 (84 South Fair Oaks Avenue)	15	0.12	0.191

The vibration velocities predicted to occur at Vibration Receptor #1 (Green Hotel Apartments), located 20 feet to the north of the nearest project site boundary would be 0.124 in/sec PPV. This exceeds the FTA 0.12 in/sec PPV threshold. Vibration Receptor #2 (Castle Green) is approximately 40 feet from the project site; at this distance, vibration impacts are anticipated to be 0.044 in/sec PPV and would not exceed the FTA threshold. Vibration Receptor #3, at a distance of 80 feet, is estimated to have vibration levels of 0.016

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in/sec PPV and would also not exceed FTA thresholds. Vibration Receptor #4 is estimated to have vibration levels of 0.191 in/sec PPV and would also exceed the FTA threshold of 0.12 in/sec PPV. **Mitigation Measures NOI-1** and **NOI-2** would reduce potential vibration impacts to associated with construction activities to a less than significant level.

**MM NOI-1:** Prior to approval of grading plans and/or prior to issuance of demolition, grading and building permits, and to the satisfaction of the City of Pasadena, the applicant shall retain a Professional Structural Engineer with experience in structural vibration analysis and monitoring for historic buildings and a Project Historical Architect as a team to ensure project construction-induced vibration levels do not expose the existing Green Hotel Apartments or the restaurant building at 84 South Fair Oaks Avenue to vibration levels of 0.12 ppv in/sec or greater. The Structural Engineer/Project Historical Architect team shall perform the following tasks:

- Review the project plans for demolition and construction;
- Survey the project site and the existing Green Hotel Apartments and restaurant building at 84 South Fair Oaks Avenue, including geological testing, if required; and
- Prepare and submit a report to the Director of Planning and Community Development to include, but not be limited to, the following:
  - Description of existing conditions at the existing Green Hotel Apartments and restaurant building at 84 South Fair Oaks Avenue;
  - Vibration level limits based on building conditions, soil conditions, and planned demolition and construction methods to ensure vibration levels would be below 0.12 ppv in/sec, the potential for damage to the existing Green Hotel Apartments and restaurant building at 84 South Fair Oaks Avenue;
  - Specific measures to be taken during construction to ensure the specified vibration level limits are not exceeded; and
  - A monitoring plan to be implemented during demolition and construction that includes post-construction and post-demolition surveys of the existing Green Hotel Apartments and restaurant building at 84 South Fair Oaks Avenue. The plan should include, but not be limited to, monitoring instrument specifications,

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instrument calibration certificates, list of exact monitoring locations, data collection protocol, alarming and alerting protocol, reporting protocol, and maintenance and service outage protocol. Any of the measures can be removed when no longer necessary to achieve the 0.12 ppv in/sec threshold of structure damage at the existing Green Hotel Apartments and restaurant building at 84 South Fair Oaks Avenue.

- Examples of measures that may be specified for implementation during demolition or construction include, but are not limited to
  - Prohibition of certain types of impact equipment;
  - Requirement for lighter tracked or wheeled equipment;
  - Specifying demolition by non-impact methods, such as sawing concrete;
  - Phasing operations to avoid simultaneous vibration sources; and
  - Installation of vibration measuring devices to guide decision making for subsequent activities. Monitoring shall be conducted, at minimum, during all ground-disturbing significant impact construction activities (i.e., demolition, shoring excavation, and foundation work). Warning thresholds, as specified in the monitoring plan, shall be below the specified vibration limits to allow the Contractor to take the necessary steps to reduce vibration, including but not limited to halting/staggering concurrent activities, utilizing quieter or lower-vibratory techniques, or reducing the speed or intensity of equipment. A monitoring record that documents all alarms and includes information regarding compliance with these vibration measures shall be provided to the City of Pasadena upon request.

**MM NOI-2:** To the satisfaction of the City of Pasadena, in the unanticipated event of discovery of vibration-caused damage, the Structural Engineer and the Project Historical Architect shall document any damage to the existing Green Hotel Apartments and/or restaurant building located at 84 South Fair Oaks Avenue caused by construction of the project and shall recommend necessary repairs. Until the conclusion of vibration causing activities, a report from the Structural Engineer or Project Historical Architect shall be submitted every 90 days to the City of Pasadena documenting the presence or absence of damage, and, if

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needed, the status of any required repairs. The project applicant shall be responsible for any repairs associated with vibration-caused damage as a result of construction of the project. Any such repairs shall be undertaken and completed as required to conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 Code of Federal Regulations 68), and shall apply the California Historical Building Code (California Code of Regulations, Title 24, Part 8) and other applicable codes.

- c. *For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?*

☐ ☐ ☐ ☒

**WHY?** The project site is not in the vicinity of a private airstrip or airport land use plan. Likewise, the project site is not located within an airport land use plan or within two miles of a public airport or public use airport. As such, the project would not expose people residing or working in the project area to excessive airport-related noise levels. No impact would occur from the proposed project and no further analysis is required.

The closest airport is the Hollywood Burbank (Bob Hope) Airport (formerly the Burbank-Glendale-Pasadena Airport), which is located more than 10 miles from Pasadena in the City of Burbank. Therefore, the proposed project would not expose people to excessive airport related noise and would have no associated impacts.

#### 4.14 POPULATION AND HOUSING

Would the project:

- a. *Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

☐ ☐ ☒ ☐

**WHY?** The proposed project involves the construction and operation of residential units, work/live units, and commercial and restaurant space, which is consistent with the land use designations for the site (See **Section 11, Land Use**, of this document). Therefore, the proposed project is consistent with the growth anticipated and accommodated by the City's General Plan. Furthermore, the project is located in a developed urban area with an established roadway network and in-place infrastructure. Thus, development of the proposed project would not require extending or improving infrastructure in a manner that would facilitate off-site growth. Therefore, the proposed project would not induce substantial population growth, and would have no related significant impacts.

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b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** The project site does not contain any existing dwelling units. Therefore, the proposed project would not displace any residents or housing, and would have no related impacts.

#### 4.15 PUBLIC SERVICES

Will the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire Protection?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The proposed project would not result in the need for additional new or altered fire protection services and would not alter acceptable service ratios or response times. The proposed project consists of 84 residential units, 4 work/live units, and approximately 6,200 square feet of restaurant and commercial space, which could increase the demand on the Pasadena Fire Department. However, the project itself is not large enough to require the development of additional Fire Department facilities. Nor does the project require alteration of any facilities (including the fire station almost directly across the street from the project). Therefore, the proposed project would not significantly impact fire protection services.

b. Police protection?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The proposed project would not result in the need for additional new or altered police protection services and would not alter acceptable service ratios or response times. The proposed project consists of 84 residential units, 4 work/live units, and approximately 6,200 square feet of restaurant and commercial space, which could increase the demand on the Pasadena Police Department. However, the project itself is not large enough to require the development of additional Police facilities. Therefore, the proposed project would not significantly impact police protection services.

c. Schools?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The City of Pasadena collects a Pasadena Unified School District (PUSD) Construction tax on all new construction. A fee is collected by the City's Building Official for PSUD on each residential unit

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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constructed, as well as a fee for non-residential development. Payment of this fee mitigates any impacts on schools.

*d. Parks?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The project is located approximately 50 feet from the nearest park, (Central Park). According to the City's park impact fee nexus study prepared in 2004, for every 1,000 residents the City as a whole has 2.17 acres of developed parkland and 1.49 acres of open space parkland, for a total of 3.66 acres of park and open space per 1,000 residents.

For each new residential unit there is a "Residential Impact Fee" charged in accordance with Pasadena Municipal Code Section 4.17.050 for parkland acquisition, capital improvements and maintenance. If affordable housing is built on the site, as in the proposed project, the residential impact fee is \$ 13,735.49 per studio to \$25,424.99 for a five or more-bedroom unit, or \$ 1,016.85 per unit for affordable housing units. Payment of this fee mitigates any project impact on parks.

*e. Libraries?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The project is located approximately 0.50 miles from the nearest branch library (Pasadena Public Library – Central Branch). The City as a whole is well served by its Public Information (library) System; and the project would not significantly impact library services and no new or expanded library facilities would be needed.

*f. Other public facilities?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The project's development may result in additional maintenance of public facilities. However, with the projected revenue to the City in terms of impact fees, increased property taxes and additional sales tax, and development fees this impact is not significant.

#### 4.16 RECREATION

*a. 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?*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** The project is located approximately 50 feet from the nearest park, Central Park. The proposed project is expected to generate 213 residents, and would result in a proportional increase in the use of neighborhood and regional parks. However, in accordance with Ordinance No. 6252, the City collects a park impact fee for each residential unit constructed and on each residential addition over 400 sq. ft. in size. These fees are used to fund land acquisition and capital improvements. The project itself would not lead to substantial physical deterioration of any recreational facilities, and would have no related significant impacts.

- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

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**WHY?** The project includes private recreational facilities for the residents of the project, including multiple outdoor terraces and a swimming pool and would not require the construction or expansion of recreational facilities. Therefore, the proposed project does not involve the development of recreational facilities that would have an adverse effect on the environment, and would have no associated impacts.

#### 4.17 TRANSPORTATION

Would the project:

- a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

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**WHY?** On November 2014, the City of Pasadena City Council adopted a resolution to replace the City's transportation performance measures with five new Transportation Performance Measures and new thresholds of significance to determine transportation and traffic impacts under CEQA. The new performance measures and CEQA thresholds are consistent with the City's adopted General Plan and Senate Bill 743 and include vehicle miles traveled (VMT) per capita, vehicle trips (VT) per capita, proximity and quality of the bicycle network, proximity and quality of the transit network, and pedestrian accessibility. The new measures support the City's vision of creating a community where people can circulate without cars, which relies upon an integrated multimodal transportation system that provides choices and accessibility for everyone in the City.

The City established *Transportation Impact Analysis Current Practice & Guidelines* to implement the transportation performance measures and CEQA thresholds. These guidelines identify projects with 50 or more residential units and/or 50,000 square feet or more of nonresidential use as having communitywide significance and must consider the City's CEQA thresholds. As a result, the project was required to undergo



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a transportation analysis to determine whether the project would exceed the transportation review thresholds described above. The Travel Demand Forecasting Model calculation results for the proposed project determined that the project would not cause a significant impact to any of the metrics as outlined in the City's Traffic Transportation Impact Analysis Current Practice and Guidelines. The transportation analysis also concluded that the project would not cause a decrease in the percentage of existing citywide service population within a quarter mile of Level 1 and 2 transit or bike facilities. Furthermore, the analysis also concluded that the project would not decrease the Citywide Pedestrian Accessibility Score.

Additionally, the proposed project lies within 0.25 miles of the Gold Line/Del Mar Metro Station and encourages bike use through providing end-of-trip bicycle storage. Therefore, the project will not conflict with a program plan, ordinance, or policy addressing the circulation system and will encourage the use of alternative modes of transportation.

b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

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**WHY?** Section 15064.3(b)(1) of the *State CEQA Guidelines* refers to evaluating transportation impacts using vehicle miles traveled (VMT) for land use projects. The City's *Transportation Impact Analysis Current Practice & Guidelines* were prepared to reflect this requirement. The CEQA transportation analysis (included as Appendix G) utilized a CEQA threshold of an increase of the existing Citywide VMT per capita of 22.6. The analysis concluded an incremental change (existing plus project) of 16.2, which is below the significant impact cap. There would be a less than significant impact.

c. *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

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**WHY?** The project has been evaluated by the Pasadena Department of Transportation (PasDOT) and its impact on circulation due to the proposed use and its design has been found not to be hazardous to traffic circulation either within the project or in the vicinity of the project. In addition, the project's circulation design meets the City's engineering standards. Therefore, the proposed project would not increase hazards due to a design feature or incompatible use, and would have no associated impacts.

d. *Result in inadequate emergency access?*

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**WHY?** The ingress and egress for the site have been evaluated by the PasDOT and found to be adequate for emergency access or access to nearby uses. The project does not involve the elimination of a through-

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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route, does not involve the narrowing of a roadway, and all proposed roadways, access roads and drive lanes meet the Pasadena Fire Department's access standards.

The project must comply with all State and local Building, Fire and Safety Codes and plans are subject to review and approval by the Public Works and the Transportation Departments, and the Building Division and Fire Department. Therefore, there would be no significant impacts related to inadequate emergency access.

#### 4.18 TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

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**WHY?** The proposed project is subject to compliance with Assembly Bill 52 (AB 52), which requires consideration of impacts to "tribal cultural resources" as defined in Public Resources Code 21074 as part of the CEQA process and requires the City to notify any groups (who have requested notification) of the proposed project who are traditionally or culturally affiliated with the geographic area of the project. Two tribes (the Gabrieleno Band of Missions Indians – Kizh Nation and the Gabrielino-Tongva Tribe) requested formal notification of all projects within the City. Accordingly, the City notified the Gabrieleno Band of Mission Indians – Kizh Nation and Gabrielino-Tongva of the proposed project under AB 52 in order to provide an opportunity to consult on tribal cultural resources and other matters of concern.

As described in Section 5, there are no known prehistoric or historic archeological sites on the project site. However, it is possible that intact and previously undiscovered prehistoric archaeological deposits are present at subsurface levels and could be uncovered during ground-disturbing activities. In the event that such deposits are previously unknown tribal cultural resources, significant effects may occur to that resource, if the resource is disturbed, destroyed, or otherwise improperly treated. As such, mitigation measure TCR-1 is provided in the event that resources are uncovered during construction. Mitigation measure TCR-1 requires a qualified Native American monitor meeting the satisfaction of the Gabrieleno Band of Mission Indians – Kizh Nation to be present during grading and excavation activities at the project

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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site. Mitigation measure TCR-1 further requires the proper handling and treatment of any significant resources would be less than significant.

**MM TCR-1:** During grading and excavation, a monitor meeting the satisfaction of the Gabrieleno Band of Mission Indians – Kizh Nation shall be present. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if Native American artifacts are found, 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 data 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 the Planning Department approves the report. Subsequently, the find shall be turned over to the tribe of the resource's origin. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources as determined by the Registered Professional Archaeologist.

- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

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**WHY?** There are no resources at the project site that have been determined by the City to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. However, as described above, there is the potential that previously undiscovered cultural resources could be uncovered during ground-disturbing activities. In the event that such resources are determined to be significant under Public Resources Code Section 5024.1, the project could result in significant impacts to such resources, if the resource is disturbed, destroyed, or otherwise improperly treated. As such, **Mitigation Measure TCR-1** has set forth procedures to ensure that any finds that are exposed during construction activities for the proposed project are properly handled and treated. Upon incorporation of **Mitigation Measure TCR-1**, impacts to tribal cultural resources would be less than significant.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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#### 4.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

- a. *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

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**WHY?** The proposed project consists of 84 residential units, 4 work/live units, and 6,200 square feet of residential and commercial space, and as a result, would increase the demand for water and wastewater service.

The City's Department of Public Works, Engineering Division maintains the local sewer system. Flows from the local system are currently carried to the trunk sewers operated by the Los Angeles County Sanitation District. An existing 18-inch vitrified clay pipe sewer main is located in Fair Oaks Avenue.

Under normal operation the proposed project would generate approximately 18,886 gallons of wastewater per day, while the proposed project would use approximately 24,261 gallons of water per day. Utility usage is discussed in the Energy section, above.

No existing sewer deficiencies were identified in the City's Master Sewer Plan.<sup>46</sup> In addition, no deficiencies have been identified in the County Sanitation Districts' collection and treatment facilities serving the City. Wastewater is currently treated at the Whittier Narrows Reclamation Plant, San Jose Creek Water Reclamation Plant, and the Los Coyotes Water Reclamation Plant. The design capacities of these facilities are based on regional growth forecasts adopted by SCAG. All expansions of the District's facilities must be sized in a manner consistent with SCAG's regional growth forecast. As previously discussed, the proposed project is consistent with the City's General Plan land use designation, which forms the basis of SCAG's regional forecast. As Los Angeles County Sanitation District 16 treats the City's wastewater, the proposed project would be subject to a sewer connection fee when the project is hooked up to a sewer line. Connection of the main sewer lines would occur during construction and would not result in environmental impacts beyond those analyzed in this SCEA.

As previously stated, the proposed project would generate the need for approximately 24,261 gallons of water per day. The proposed project would be subject to several PMC requirements designed to reduce water consumption. In conformance with the California Green Building Program (CALGreen), the City has

<sup>46</sup> City of Pasadena, Master Sewer Plan, Figure 6-1.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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adopted an amended California Green Building standards Code (PMC 14.04.500) for all new construction and tenant improvements. In conformance with this Ordinance, the project would be designed to meet the California Green Building Standards Code Tier 2 Requirements (PMC 14.04.504, Section 307.2). In addition to the mandatory measures of Tier 2, compliance with specific prerequisites and as many additional elective measures to achieve an equivalent 50 LEED points is also required to achieve Tier 2 status (PMC 14.04.558), which would reduce water use through various water conservation measures. Furthermore, the proposed project would be subject to the Water Waste Prohibitions and Water Supply Shortage Plans Ordinance (PMC 13.10), which imposes mandatory water conservation measures during Level 1 (least restrictive) through Level 4 (most restrictive) water supply shortages; the Water Efficient Landscaping Ordinance (PMC 13.22); and Landscaping Ordinance (PMC 17.44); to further reduce water demand and any corresponding requirement for new water facilities. In addition, since the proposed project is consistent with the General Plan designation for the project site, the growth associated with the project has already been accounted for in PWP's latest Urban Water Management Plan. Further, more than 75 percent of planting material utilized in this project is identified by WUCOLS (Water Use Classification of Landscape Species) as needing "Low" or "Very Low" amounts of irrigation water, indicating that an overwhelming majority of plants will be drought tolerant. The project would use a drip irrigation system with a weather-based irrigation controller. Refer to the CAP Consistency Checklist Supporting Docs, p. 8-9 (Landscape Plan - Ground Floor Tree Locations, Landscape Plan - Ground Floor Planting Locations) for additional information about landscape and irrigation systems, included in **Appendix D**. Therefore, the proposed project is not expected to exceed PWP's available supplies, and impacts would be less than significant.

No deficiencies have been identified for the water mains and treatment facilities that currently serve the project area. In addition, as a priority project for the City's Water System identified in the current Capital Improvement Program, new and replacement water distribution mains would be installed at various locations throughout the City, which would be funded, in part, by development fees.<sup>47</sup> The proposed project would also be required to pay fees to connect to the existing water mains available to serve the site. Overall, as existing wastewater and water facilities are available to serve the proposed project and no new wastewater or water treatment facilities or expansion of existing facilities would be required impacts would be less than significant.

As discussed in Section 6, Energy, increased energy use by this project is not expected to be significant in relationship to the number of customers currently served by the electrical and gas utility companies. Supplies are available from existing mains, lines and substations in the area. Occupation associated with

<sup>47</sup> City of Pasadena, Budget In Brief | Fiscal Year 2020, <https://www.cityofpasadena.net/finance/wp-content/uploads/sites/27/2020-Budget-in-Brief.pdf?v=1575936000082>

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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the project is not expected to significantly increase consumption of natural gas. Furthermore, the project would not require or result in the relocation of telecommunications facilities. This impact is less than significant.

b. *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

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**WHY?** As shown in **Table 4.19-1** below, project would result in an increase of approximately 24,220 gallons per day in water consumption.

As previously noted, project water would be provided by PWP. Based on known present uses of the site for surface parking, it is reasonably and conservatively assumed that minimal water uses currently occur on the Project Site. Therefore, implementation of the proposed project would introduce new water use requirements to the site, and would increase the amount of water delivered to the Project Site by PWP. However, land uses associated with the proposed project are consistent with land uses anticipated in the current Urban Water Management Plan (UWMP) for this area of Pasadena. As such, the proposed project would introduce water usage rates consistent with land uses anticipated in the UWMP and associated water supply planning documents for the area.

Further, during periods of drought, this project would be required to comply with the City's Water Shortage Procedures Ordinance, which reduces monthly water consumption to 90 percent of the expected consumption for this type of land use. According to the Water Division of the Pasadena Water and Power Department, there are sufficient water supplies available to serve the project from existing entitlements and resources.

**Table 4.19-1  
Projected Water Use**

Land Use	Size	Usage Rate <sup>1</sup> (gallons per day)	Water Use (Gallons per day)
Market Rate Apartments	84 units	218/unit	18,312
Work/Live Units	4 units	218/unit	872
	5,245 sf	0.216/sf	1,133
Restaurant	65 seats <sup>a</sup>	36 gpd/seat	2,340
Commercial /Retail	4,218 sf	0.216/sf	912
Parking structure	195 spaces	2/parking space	390
Landscaping	4,194 sf	MAWA <sup>b</sup>	261
<b>TOTAL PROJECT Water Use</b>			<b>24,220</b>

*gpd = gallons per day; sf = square feet*

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**1. Assumptions:**

The water use factors utilized for these project demand estimates were drawn from a WSA approved for the City of Pasadena<sup>48</sup> as well as from the DWR's Urban Water Needs Analysis produced in 2017. These water use estimates are slightly more than the figures reported in the City of Pasadena's 2002 Water System Master Plan and the City of Pasadena's UWMP; however, these figures are used for the purposes of providing conservative estimates.

All water use calculations assume same water use over 365 days per year.

a: 1,974 sf / 30 sf per seat = 65 seats

b: MAWA = maximum applied water allowance:

52.3 = Reference Evapotranspiration in inches per year – assumed to be 52.3 inches from the Model Water Efficient Landscape Ordinance for Pasadena (California Code of Regulations, Title 23. Waters - Division 2. Department of Water Resources – Chapter 2.7. Model Water Efficient Landscape Ordinance);

0.62 = Conversion factor for inches to gallons;

0.7 = Evapotranspiration Adjustment Factor;

4,194 = Landscaping Area in square feet.

$52.3 * 0.62 * 0.7 * 4,194 = 95,196$  gallons per year/365 = 261 gpd

Source: City of Pasadena 2015, Impact Sciences, 2020

In September 2008, Council directed PWP to develop a Comprehensive Water Conservation Plan (CWCP) with a variety of approaches and recommendations for achieving 10%, 20% and 30% reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the CWCP presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10). As a long-term goal, the CWCP presupposes an initial target of reducing per-capita potable water consumption 10% by 2015 and 20% by 2020.

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements began in 2009, as a result of the State's 20x2020 Water Conservation Plan from April 30, 2009 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program.

The project is also required to adhere to the requirements of the Water Efficient Landscape Ordinance which was adopted in 2010 and updated in 2018. This ordinance is a result of State Assembly Bill 1881 (SB1881) which mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. The project must adhere to all applicable provisions on this ordinance which are contained in Title 13 (Utilities and Services) of the Pasadena Municipal Code. The ordinance may require design features that include specific plant types, the use of recycled water for irrigation and/or water features etc. Adherence to the requirements will reduce the amount of water used in the project landscaping and will aid the project in complying with all related water reduction provisions.

<sup>48</sup> City of Pasadena. 2015. Hill and Colorado Project Water Supply Assessment, Appendix A. July.



Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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Project impacts would be less than significant.

- c. *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?*

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**WHY?** The proposed project under normal operation would generate approximately 18,725 gallons of wastewater per day.<sup>49</sup> However, the proposed increase to wastewater service demand is negligible in comparison to the existing service area of the wastewater service purveyor. Wastewater from the City is currently treated by the County Sanitation Districts' Whittier Narrows Reclamation Plant, San Jose Creek Water Reclamation Plant, and the Los Coyotes Water Reclamation Plant. No deficiencies have been identified in these wastewater treatment facilities. Furthermore, the proposed project would be subject to a County Sanitation Districts' sewer connection fee when the project is hooked up to a sewer line. In order to cover current and future infrastructure costs for sewer facilities located in the City, the proposed project may also be subject to a Sewer Facility Fee Charge as specified under PMC 4.53, if it is determined that there is an increase in the average daily flow compared to existing conditions. Therefore, impacts on available wastewater treatment capacity of the wastewater treatment plants that serve the project site would be less than significant.

- d. *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

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**WHY?** The project can be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The City of Pasadena is served primarily by Scholl Canyon landfill, which is permitted through 2030. The Scholl Canyon Landfill has a maximum daily capacity of 3,400 tons and a total remaining capacity of 9,900,000 cubic yards (CalRecycle 2020). Because there is adequate remaining capacity to accommodate the amount of solid waste generated by the proposed project, the proposed project's impacts to landfill capacity would be less than significant.

Waste generated at the project site would be required to comply with AB 939. Passed in 1989, this regulation requires every city in California to divert at least 50 percent of its annual waste by the year 2000. The City of Pasadena has 37 solid waste diversion programs, including composting, household hazardous waste, public education programs, recycling, source reduction, and special waste materials such as tires and concrete/asphalt/rubble (CalRecycle 2013), including the City's Pay-As-You-Throw program that offers reduced costs for households that recycle more and throw away less mixed waste. For 2010, the State

<sup>49</sup> Calculated as 80 percent of anticipated water usage minus water used for landscaping and in the parking structure.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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estimated that Pasadena generated as a whole 584,840 tons of waste. Of this total, 152,881 tons were disposed in a landfill and 431,959 tons were diverted, yielding a diversion rate of just over 73 percent for Pasadena. Further, the City has adopted the Zero Waste Strategic Plan that provides a philosophy and design framework that promotes reuse, recycling, and conservation programs, and emphasizes sustainability by considering the entire life-cycle of products, processes, and systems (City of Pasadena 2014). The Plan aims to get the City as close as possible to zero waste by 2040.

The City of Pasadena's Climate Action Plan also aims to reduce GHG emissions through a reduction in solid waste. The strategy aims to minimize waste by improving waste management and promoting reuse, recycling, and composting. The proposed project would include separate trash and recycling bins. The first parking level (P1) features two rooms that include space for separate trash and recycling bins. Informational signage will be displayed to clearly indicate which materials can be recycled to educate residents, employees, and visitors to the building about proper refuse disposal procedures.

The handling of all debris and waste generated during construction of the proposed project would be subject to the State's (AB 939) requirements for salvaging, recycling, and reuse of materials from construction activity on the project site. The proposed project has two components (construction and operation) that would result in the generation of solid waste. For purposes of this analysis, the estimated operational waste is used to determine the net increase in solid waste from the proposed project. Construction of the proposed project would also involve site preparation activities that would generate waste materials. However, construction would be temporary.

The proposed project would also be subject to PMC Chapters 8.61 and 8.62. Chapter 8.61 establishes the City's Solid Waste Collection Franchise System where each franchisee is responsible for meeting the minimum recycling diversion rate of 75 percent on both a monthly basis and annual basis for construction and demolition debris and 60 percent on monthly basis and on an annual basis for other solid waste. Chapter 8.62 is the construction demolition and waste management ordinance and includes preparation of a Construction Waste Management Plan for new structures over 1,000 SF. Pursuant to this ordinance, the proposed project would be required to divert a minimum of 75 percent of the construction and demolition debris from the project. Further, the proposed project would be required to meet the standards of California Green Building Standards Code, and would be required to comply with design requirements for refuse storage areas (PMC Section 17.40.120). The applicant may also be required to submit a program to the Public Works

The project would not result in the need for a new or in substantial alteration to the existing system of solid waste collection and disposal. Therefore, the project would cause no impacts under this topic.

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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e. *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**WHY?** In 1992, the City adopted the "Source Reduction and Recycling Element" to comply with the California Integrated Waste Management Act. This Act requires that jurisdictions maintain a 50% or better diversion rate for solid waste. The City implements this requirement through Section 8.61 of the Pasadena Municipal Code, which establishes the City's "Solid Waste Collection Franchise System". As described in Section 8.61.175, each franchisee is responsible for meeting the minimum recycling diversion rate of 50% on both a monthly basis and annual basis. The proposed project is required to comply with the applicable solid waste franchise's recycling system, and thus, will meet Pasadena's and California's solid waste diversion regulations. In addition, the project complies with the City's Construction and Demolition Ordinance (PMC Section 8.62) and design requirements for refuge storage areas (PMC Section 17.64.240). Therefore, the project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

Additionally, in accordance with the Construction and Demolition Ordinance (Chapter 8.62 of the Pasadena Municipal Code, the applicant must submit a Construction Waste Management Plan, if the project meets any of the following thresholds;

- Residential additions of 1,000 or more gross square feet;
- Tenant improvements of 3,000 or more square feet;
- New structures of 1,000 or more gross square feet;
- Demolition 1,000 or more gross square feet; and
- All City public works and construction projects, which are awarded pursuant to competitive, bid procedure established by Chapter 4.08 of the Pasadena Municipal Code).

Since the proposed project includes the construction of over 1,000 square feet of new structures, the project is subject to, and would be required to comply with the Ordinance.

#### **4.20 WILDFIRE**

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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- a. *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** According to Plate P-2 from the City's 2002 Safety Element of the General Plan, the project site is in a low fire hazard zone. Therefore, the proposed project would not cause an impairment to an adopted emergency response plan or emergency evacuation plan.

- b. *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** As stated above, according to Plate P-2 from the City's 2002 Safety Element of the General Plan, the project site is in a low fire hazard zone. In the event a fire begins during construction or operation of the project, the nearest fire station is the City of Pasadena Fire Station No. 31, located approximately 130 feet from the project site. Being in a developed urban area, there are several fire protection facilities in the project vicinity that could respond to an emergency at the site. There would be a less than significant impact and no mitigation is required.

- c. *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** As stated above, according to Plate P-2 from the City's 2002 Safety Element of the General Plan, the project site is in a low fire hazard zone. The project site is located in a dense urban area that would not require the installation of infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate the fire risk. There would be a less than significant impact and no mitigation is required.

- d. *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The project site is relatively flat within a low fire hazard zone of a highly urbanized portion of Pasadena. The risk of wildfire or the resulting runoff and drainage changes as a result of wildfire are very low. There would be a less than significant impact and no mitigation is required.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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#### 4.21 EARLIER ANALYSIS

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See *CEQA Guidelines* Section 15063(c)(3)(D).

No program EIR, tiering, or other process can be used for analysis of the project's environmental effects.

#### 4.22 MANDATORY FINDINGS OF SIGNIFICANCE

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

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**WHY?** As discussed in **Section 4.4, Biological Resources**, the project would not impact any endangered fauna or flora. Further, because of the highly urbanized nature of the project site and the surrounding area, construction and operation of the proposed project would not impact the habitat or population of the project site and the surrounding area, the project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 4.5, Cultural Resources**, potential impacts related historical, archaeological, and paleontological resources would be less than significant following the implementation of the regulatory compliance and mitigation measures.

Therefore, the project will not substantially degrade the quality of the land, air, water, minerals, flora, fauna, noise and objects of historic or aesthetic significance.

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

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**WHY?** The potential for cumulative impacts occurs when the independent impacts of the project are combined with impacts from other development to result in impacts that are greater than the impacts of the project alone. Located within the vicinity of the project site are other past, current, and reasonably foreseeable projects whose development, in conjunction with that of the project, may contribute to potential

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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cumulative impacts. However, based on the proceeding discussions, which consider cumulative conditions/impacts, no unmitigatable significant impacts were identified for the environmental resources identified in this Initial Study. As the proposed project would not result in any unmitigated significant impacts pursuant to the topics analyzed in the above Initial Study Checklist, the project would not result in a considerable contribution to any significant cumulative impacts.

*c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

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**WHY?** As identified throughout the analysis, the proposed project would have no unmitigatable significant impacts that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant.