

Initial Study

Affinity Project City of Pasadena, California

Prepared for	City of Pasadena Planning and Community Development Department 175 North Garfield Pasadena, California 91101
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August 2021

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CITY OF PASADENA
100 NORTH GARFIELD AVENUE PASADENA, CA 91101

INITIAL STUDY

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated “Master Application Form,” and/or Environmental Assessment Form and supporting data constitute the Initial Study (IS) pursuant to the California Environmental Quality Act (CEQA) for the proposed Affinity Project (hereinafter referred to as the “Project”). This IS provides the assessment for a determination whether the Project may have a significant effect on the environment.

SECTION 1.0 PROJECT INFORMATION

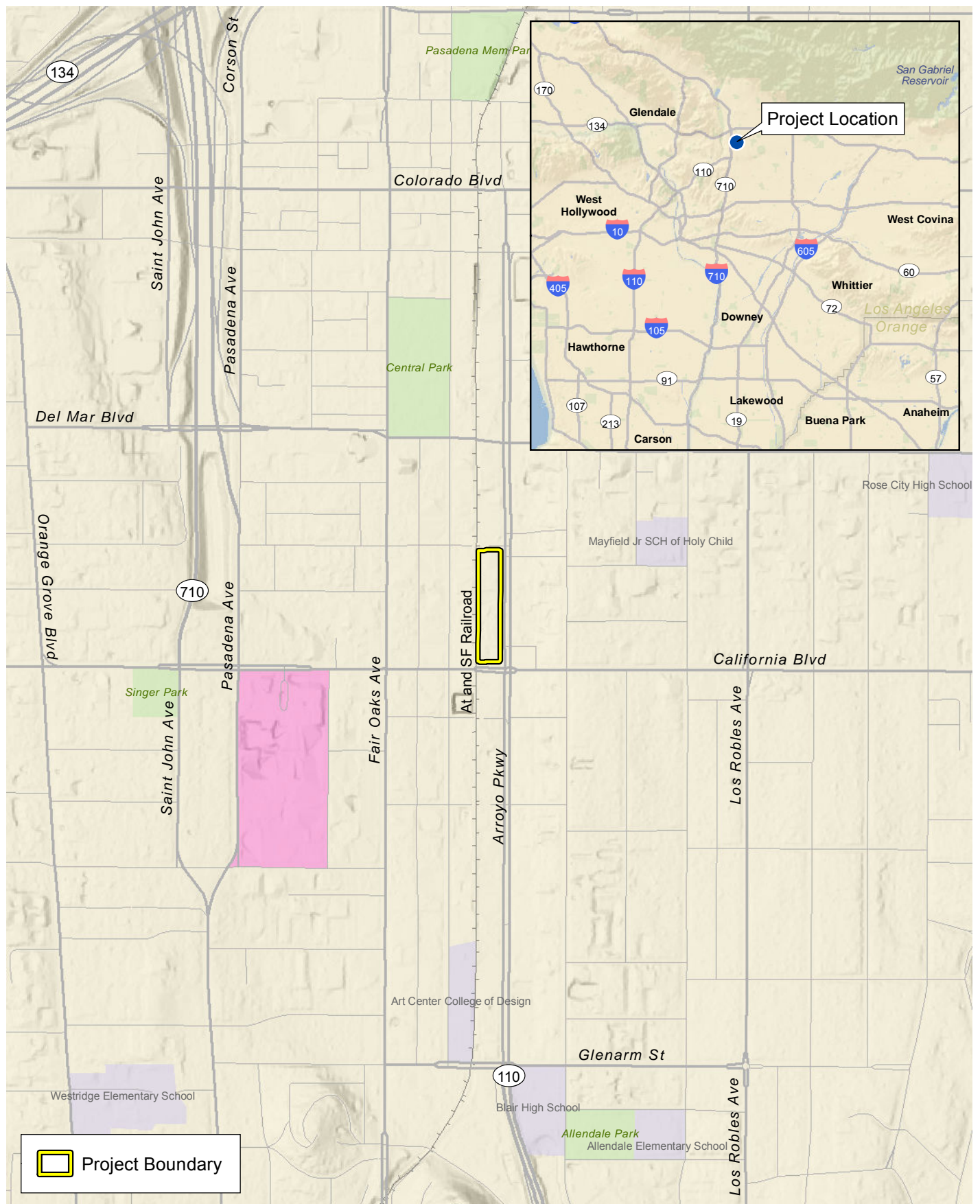
- | | |
|---|--|
| 1. Project Title: | Affinity Project |
| 2. Lead Agency Name and Address: | City of Pasadena
Planning and Community Development Department
175 North Garfield Avenue
Pasadena, California 91101 |
| 3. Contact Person and Phone Number: | Jason Van Patten, Senior Planner
626.744.6760 |
| 4. Project Location: | 465–577 South Arroyo Parkway
Pasadena, California 91105
(See Exhibit 1) |
| 5. Project Sponsor’s Name and Address: | The Arroyo Parkway, LLC
716 Mission Street
South Pasadena, California 91030 |
| 6. General Plan Designation: | High Mixed-Use |
| 7. Zoning: | CD-6 (Central District, Arroyo Corridor/Fair Oaks Sub-District) |
| 8. Description of the Project: | |

The Affinity Project (Project) proposes partial redevelopment of an approximate 3.3-acre site encompassing nine commercial buildings on five parcels located between 465 and 577 South Arroyo Parkway with medical office, commercial, and assisted living facilities. Exhibit 1, Regional Location and Local Vicinity, illustrates the Project site location. The discussion below provides further details of the Project.

Project Components

The Project Applicant requests approval to rezone the Project site from CD-6 (Central District Specific Plan [CDSP], Arroyo Corridor/Fair Oaks subdistrict), to a Planned Development (PD) zone, and approval of a PD Plan. The Project involves demolition of six (of the nine) existing buildings totaling 45,912 square feet (sf), located at 491, 495, 499, 503, 541, and 577 South Arroyo Parkway and construction of two new buildings: (1) a 154,000-square foot (sf), 7-story (aboveground) medical office building with ground-floor commercial uses (Building A); and (2) a 184,376-sf, 7-story (aboveground) assisted living building with 85,800 sf of assisted living uses and 98,576 sf of independent living uses including up to 95 one- and two-bedroom senior housing units (Building B). As proposed, there would be five subterranean levels providing up to 850 parking spaces. Approximately 31,605 sf of open space, including public and private (for solely resident and staff use) space would be provided across the Project site.

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Regional Location and Local Vicinity

Exhibit 1

Affinity Project



1,000 500 0 1,000 Feet



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Alternatively, the proposed PD Plan would provide the flexibility to exchange the uses in Building A from medical office and ground floor commercial for the following:

- 3,000 sf of commercial and a sales/leasing management office on the ground floor;
- Up to 197 residential dwelling units¹; and
- Up to 650 parking spaces in four subterranean levels (one less than the Project as proposed).

Although the Project initially described is anticipated to reflect the Project to be constructed, the flexibility to exchange uses in Building A would enable the Project to respond to the economic needs and demands of the City at the time of Project implementation. The proposed site layout and the aboveground height, mass, and other parameters of the Building A design would remain the same. The PD Plan would define all aspects of site design and provide caps on the types and amounts of allowable land uses, regardless of whether Building A is developed with medical office or residential dwelling units. It is noted that based on the development cap of 87 dwelling units per acre (du/acre), a total of 289 units could be constructed. Therefore, if a total of 197 units were constructed in Building A, only 92 independent living units could be constructed in Building B. Conversely, if 95 independent living units were constructed in Building B, only 194 units could be constructed in Building A.

Throughout the CEQA documentation, these two development scenarios will be referred to as:

- Project (development of Building A with medical office/commercial) and
- Project with Building A Residential/Commercial (development of Building A with residential/commercial).

Table 1-1, Summary of Project Data, on the following page summarizes the existing and proposed uses for the Project. Exhibit 2, Existing Project Site, illustrates the addresses and locations of the nine existing buildings and other on-site uses; and Exhibit 3, Affinity Project Site Plan, provides an overview of the proposed uses.

Approximately 79,553 sf of existing development would be retained and integrated into the Project. This includes the Whole Foods Market and associated 275-space subterranean parking structure at 465 South Arroyo Parkway, and the two historic structures at 501 and 523 South Arroyo Parkway. The Applicant anticipates that restaurant uses would occupy approximately 5,882 sf of space in the existing historic buildings to be retained at 501 and 523 South Arroyo Parkway.

A total of five levels of subterranean parking spanning both proposed buildings with up to 850 parking spaces would be constructed to serve the new development as well as the existing structures at 501 and 523 South Arroyo Parkway under the Project scenario. When including the new subterranean parking, the Project would consist of approximately 753,439 sf of new construction. For the Project with Building A Residential/Commercial, a total of four levels of subterranean parking spanning both proposed buildings with up to 650 parking spaces would be constructed to serve the new development as well as the existing structures at 501 and 523 South Arroyo Parkway. For both scenarios, the land uses south of Whole Foods Market would have three ingress/egress points—one on California Boulevard and two on South Arroyo Parkway. Whole Foods Market would retain the entrance on Bellevue Drive and the exit onto South Arroyo Parkway.

¹ Anticipated to be market-rate condominiums or apartments of various sizes



Existing Project Site

Affinity Project



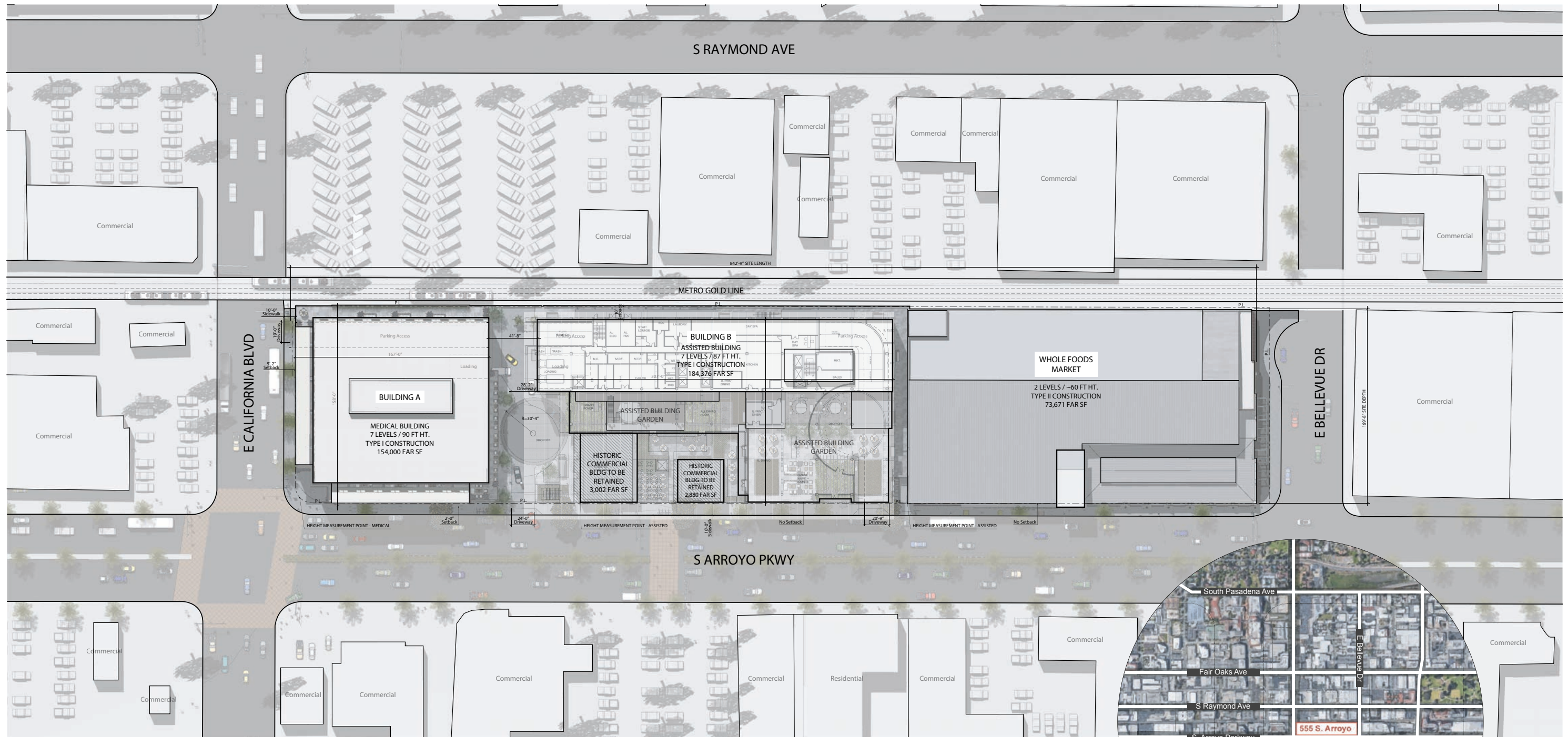
Map not to scale

Source: Adept 2021

Exhibit 2



(07/20/2021 MMD) R:\Projects\PAS\Pasaden\3PAS012100\Graphics\IS\ex\existing_project\site.pdf



Project Site Plan

Affinity Project



Map not to scale

Source: Adept 2021

Exhibit 3



**TABLE 1-1
SUMMARY OF PROJECT DATA**

Existing Buildings to Remain		
Address	Use	Floor Area (Gross sf)
465 South Arroyo Parkway	Whole Foods Market	73,671 sf
501 South Arroyo Parkway (historic)	Gold Line Pilates	2,880 sf
523 South Arroyo Parkway (historic)	Town & Country Event Rentals	3,002 sf
Total Square Footage		79,553 sf
Parking (Whole Foods Structure)		275 spaces / 2 loading spaces
Project Development		
	Floor Area (Gross sf)	
	Medical Office Building (A)	Assisted Living Facility (B)
Basement/Subterranean Levels	415,063	
Ground	14,635	25,377
2 nd	23,028	31,269
3 rd	26,671	29,107
4 th	26,671	29,107
5 th	26,671	29,107
6 th	21,162	21,299
7 th	21,162	19,110
Total Gross Square Footage	154,000 (Aboveground)	184,376 (Aboveground)
	753,439 (Including five subterranean levels spanning both buildings)	
Parking	Up to 850 spaces	
Total Aboveground Built Area (Existing + Proposed)	417,929	
Building Outline/Site Coverage	99,224 sf / 68 percent	
Proposed FAR	2.89	
Open Space	8,676	22,929
Project with Building A Residential/Commercial Development		
	Floor Area (Gross sf)	
	Residential/Commercial Building (A)	Assisted Living Facility (B)
Differences from Project Scenario	Up to 197 dwelling units & 3,000 sf of ground-floor commercial	Same as Project
Total Square Footages	154,000 (Aboveground)	184,376 (Aboveground)
	670,427 (Including four subterranean levels spanning both buildings) ^a	
Parking	Up to 650 spaces	
Total Aboveground Built Area (Existing + Proposed)	417,929	
Building Outline/Site Coverage	99,224 sf / 68 percent	
Proposed FAR	2.89	
Open Space	8,676	22,929
^a Reflects one less subterranean parking level, all other floor area sizes are the same sf: square feet; N/A: not applicable; FAR: floor area ratio		

Construction Activities

The Project would be constructed beginning in 2023 over a period of approximately 34 months and would be completed in a single phase. Project construction would occur from Monday through Saturday, without activity on Sundays or holidays, between the hours defined in Section 9.36.070 (Construction Projects) of the City of Pasadena Municipal Code (PMC) (7:00 AM to 7:00 PM on Monday through Friday and 8:00 AM to 5:00 PM on Saturday).

Construction would involve demolition, site preparation, excavation and grading, and building construction phases that would involve varying amounts and types of waste streams requiring export. Demolition of the six existing buildings and other on-site improvements, such as paving, light fixtures, and signage, would generate an estimated 4,200 cubic yards (cy) of debris; and excavation to accommodate the subterranean parking structure would generate up to an estimated 184,013 cy of soil for the Project with five levels of subterranean parking. Chapter 8.62 (Waste Management Plan for Certain Construction and Demolition Projects within the City of Pasadena) et. seq. of the PMC is the City's construction and demolition waste management ordinance (C&D ordinance), which requires at least 75 percent of the construction waste stream to be diverted from landfill disposal. Construction and demolition debris, after diversion, would be disposed at Scholl Canyon Landfill, located approximately 2.5 miles northwest of the site, at 3001 Scholl Canyon Road in Glendale. Construction and demolition debris being diverted from landfill disposal may be directed to many different facilities in the region that reuse or recycle this type of material.

Project Operation

The Project is anticipated to be opened to the public in 2026. The medical office building would operate with hours typical of the land use—generally between 8:00 AM and 6:00 PM on weekdays and between 9:00 AM and 1:00 PM on Saturdays. However, operational hours of individual tenants of the medical office building would vary and may be longer or shorter than the typical hours. The medical office uses within the medical office building are expected to result in approximately 523 visitors per day and 646 employees. The ground floor commercial uses within the medical office building are expected to result in approximately 43 visitors per day and 9 employees.

If the Project with Building A Residential/Commercial is constructed, Building A would generate up to 493 residents associated with up to 197 units². As with the Project, the commercial uses on the ground floor of the medical office building are expected to result in approximately 43 visitors per day and 9 employees.

The assisted living building (Building B) would also operate with hours typical of the land use. The assisted living uses are generally operational 24 hours per day with visitation hours anticipated to be daily (Monday through Sunday) between 8:00 AM and 6:00 PM. The assisted living building is expected to result in up to approximately 66 employees, 113 persons cared for, and 109 residents associated with the up to 95 independent living units.

Discretionary Actions by the City

Implementation of the Project would require the following discretionary approvals by the City of Pasadena:

- Adoption of the Planned Development (PD) Zoning District and PD Plan (this includes approval of the Affinity Project and rezoning of the property from CD-6 to PD-39);
- Certification of the Affinity Project Environmental Impact Report;
- Variance for Historic Resources for Building Height;

² Based on a rate of 2.5 persons per household derived from the Southern California Association of Governments (SCAG) 2019 Profile for the City of Pasadena (SCAG 2019).

- Public Street Tree Removal Approval;
- Design Review;
- Vesting Tentative Tract Map or Tentative Tract Map Approval (only if residential units for sale); and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to: master sign plan, temporary street closure permits, encroachment permits, grading permits, excavation permits, foundation permits, and building permits (including lot tie agreement).

Probable Environmental Impacts of the Project

Based on the analysis presented in this IS, the Project would have the potential to result in significant adverse impacts related to one or more environmental checklist questions in the environmental topics listed below. The relevant checklist questions for the following topics will therefore be carried forward for additional analysis in the Draft EIR:

- | | |
|--|---------------------------------|
| • Air Quality | • Noise |
| • Cultural and Paleontological Resources | • Public Services |
| • Energy | • Recreation |
| • Greenhouse Gas Emissions | • Transportation |
| • Hazards and Hazardous Materials | • Tribal Cultural Resources |
| • Land Use and Planning | • Utilities and Service Systems |

Based on the analysis presented in this IS, the Project would result in no impacts or less than significant impacts related to the environmental checklist questions for the topics listed below. The following topics have therefore been scoped out of the Draft EIR:

- | | |
|--------------------------------------|--------------------------|
| • Aesthetics | • Mineral Resources |
| • Agriculture and Forestry Resources | • Population and Housing |
| • Biological Resources | • Wildfire |
| • Geology and Soils | |
| • Hydrology and Water Quality | |

9. Surrounding Land Uses and Setting:

As illustrated on Exhibit 1, the site is bound by East Bellevue Drive on the north, South Arroyo Parkway on the east, East California Boulevard on the south, and the Metro Gold Line (now referred to as the L Line) railroad right-of-way on the west. The Project area is an urban environment, and the site and surrounding area are fully built out with a mix of land uses. The Project site is surrounded by commercial land uses and surface parking to the north, northeast, east, and south. Other land uses to the north include medical offices; Pasadena Humane Society, located approximately 0.1 mile to the northwest; and Central Park, located approximately 0.2-mile northwest of the site. Single- and multi-family residential land uses located, at the nearest, approximately 0.2 mile to the north on Del Mar Boulevard; approximately 0.1 mile to the north-northeast on Bellevue Drive; and less than 0.1 mile to the east along Marengo Avenue. Land uses to the south include a mix of commercial, medical office, and single- and multi-family residential land uses; the latter is located along Marengo Avenue and California Boulevard to the southeast. To the west, there is a mix of commercial and non-profit (i.e., npr/KPCC and Union Station Homeless Services) uses. Further from the site, land uses include a mix of commercial, medical, light industrial, single- and multi-family residential, and public (e.g., schools, churches, parks). Regional access to the site is provided by State Route 110 located approximately 0.6-mile due south on Arroyo Parkway. Local access is provided by adjacent surface streets and Metro's Del Mar Station located approximately 0.2 mile to the north.

10. Other public agencies whose approval is required:

- Los Angeles Regional Water Quality Control Board (National Pollutant Discharge Elimination System [NPDES] permitting) and
- Los Angeles County Metropolitan Transportation Authority (for construction within 100 feet of a Metro light rail line).

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code Section 21080.3.1? If so, has consultation begun?

Consultation pursuant to Section 21080.3.1 of the *Public Resources Code* and Assembly Bill (AB) 52 was initiated and is ongoing with the California Native American tribes affiliated with the City of Pasadena and who have requested consultation and the consultation process is ongoing. Refer to Section 2.18, Tribal Cultural Resources, of this IS for further information.

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.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology and Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use and Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities and Service Systems |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Population and Housing | <input checked="" type="checkbox"/> 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.	X
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.	

Prepared By

Date

Reviewed By

Date

Printed Name

Printed Name

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 Environmental Impact Report (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.

SECTION 2.0 ENVIRONMENTAL CHECKLIST FORM**2.1 AESTHETICS**

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

Pursuant the Senate Bill (SB) 743, the Project site is an infill project and is located within a transit priority area. SB 743, via Section 21099(d) of the Public Resources Code, defines criteria for evaluating certain transit-oriented infill projects under CEQA, as follows:

“Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”

As discussed in Section 1.0, the Project site is zoned CD-6, which is defined in Section 17.30.020 of the PMC as “...intended to provide for a broad mix of uses at the periphery of the urban core, including employment generating uses that are adaptable to changing economic conditions, as well as to establish Arroyo Parkway as a visually important and attractive gateway to Downtown”. Pursuant to the CDSP, employment-generating uses including commercial, service, office, and certain industrial uses are permitted or conditionally permitted in the CD-6 zone. High-Quality Transit Areas (HQTAs) are areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. Transit Priority Areas (TPAs) are areas within one-half mile of a major transit stop that is existing or planned (SCAG 2020). The floor area ratio (FAR) for the Project would be 2.89 (refer to Table 1-1), and SCAG has identified the site as within both a TPA and a HQTA. Specifically, the Metro’s Fillmore Station is located approximately 0.15 mile to the south of the site and the Del Mar Station is located approximately 0.2 mile to the north. Arroyo Parkway along the east side of the Project site is a Metro bus corridor for lines 177 and 256, with bus stops situated at the northeast and southwest corners of the site.

Accordingly, the City has concluded the Project qualifies as an employment center project, which is defined in Section of the Public Resources Code as "... a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area" as well as a mixed-use project. Therefore, consistent with Section 21099(d) of the Public Resources Code, the aesthetic effects of the Project are not considered significant environmental impacts, and this issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

If the Project with Building A Residential/Commercial is constructed, the development would qualify as both a residential and mixed-use project pursuant to SB 743. Therefore, consistent with Section 21099(d) of the Public Resources Code discussed above, the aesthetic effects of the Project with Building A Residential/Commercial are not considered significant environmental impacts, and this issue will not be further evaluated in the Draft EIR.

2.2 AGRICULTURE AND FORESTRY 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.

Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY?

Project

The City is a developed urban area surrounded by hillsides to the north and northwest. The City contains no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the most recent maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (FMMP 2017). Therefore, the Project would not impact agriculture resources. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project analysis above, there is no Farmland within the City. Therefore, the Project with Building A Residential/Commercial would not impact agricultural resources. This issue will not be further evaluated in the Draft EIR.

Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY?

Project

The City has no land zoned for agricultural use other than commercial growing areas and land within certain specific plan areas. The Project site is zoned CD-6 (Central District Specific Plan, Arroyo Corridor/Fair Oaks

subdistrict), which is not one of the zones that permits commercial growing areas. Accordingly, there are no conflicts with agricultural zoning, and Williamson Act contracts are not applicable to the Project site. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, there is no conflict with agricultural zoning on the Project nor are there Williamson Act contracts applicable to the site. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

There is no forest land, timberland, or any Timberland Production Zones in the City; therefore, the proposed Project would not result in the loss of forest land, timberland, or Timberland Production areas. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, there is no forest land, timberland, or any Timberland Production Zones in the City. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

There is no forest land in the City; therefore, the proposed Project would not result in the conversion or loss of forest land. No part of the Project site includes forest land as defined by the State, including forest land (Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or Timberland Production (as defined by Government Code section 51104[g]). This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, there is no forest land in the City. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

As discussed in Threshold 2.2(a), there is no designated Farmland in the City. Therefore, the proposed Project would not indirectly result in the conversion of farmland to a non-agricultural use. Likewise, as discussed in Thresholds 2.2(c) and 2.2(e), there are no forestry resources that would be converted to non-forest use by the proposed Project. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, there is no Farmland or forestry resources in the City and there would be no indirect conversion of agricultural or forestry resources. This issue will not be further evaluated in the Draft EIR.

2.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The City is within the South Coast Air Basin (SCAB). On March 3, 2017, the South Coast Air Quality Management District (SCAQMD) adopted the 2016 Air Quality Management Plan (AQMP), which is a regional and multi-agency effort (SCAQMD, California Air Resources Board, Southern California Association of Governments [SCAG], and U.S. Environmental Protection Agency [USEPA]). The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy; updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts.

Short-term construction and long-term operation of the Project would result in a net increase in stationary and mobile source criteria air pollutants emissions in the SCAB compared to the existing uses on the site. Therefore, consistency with the 2016 AQMP will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

Short-term construction and long-term operation of the Project with Building A Residential/Commercial would result in a net increase in stationary and mobile source criteria air pollutants emissions in the SCAB compared to the existing uses on the site. Therefore, consistency with the 2016 AQMP will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The SCAB is an airshed that is designated a non-attainment area for selected criteria pollutants. As stated in Threshold 2.3(a), construction and operation of the Project would result in a net increase in air pollutants.

The Project's potential to result in a cumulatively considerable increase in those pollutants for which the SCAB is in non-attainment, when considered in combination with other development planned in the SCAB, will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the potential for the Project with Building A Residential/Commercial to result in a cumulatively considerable increase in those pollutants for which the SCAB is in non-attainment will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

Land uses surrounding the Project site are commercial, with the Metro L (Gold) Line railroad right-of-way abutting the site to the west. The nearest sensitive receptors are residential land uses located on South Marengo Avenue approximately 250 feet (ft) to the east. While it is unlikely that construction and operation of the Project would adversely affect these receptors due to distance, the potential to expose any nearby sensitive receptors to substantial pollutant concentrations will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the potential for construction and operation of the Project with Building A Residential/Commercial to expose any nearby receptors to substantial pollutant concentrations, though unlikely, will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

According to the SCAQMD's *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The Project does not

propose to operate any of these land uses and would not otherwise be expected to produce objectionable odors.

Short-term construction equipment and activities would generate odors, such as diesel exhaust emissions from construction equipment and paving activities. However, these odors would be temporary and would dissipate rapidly from the source with an increase in distance. Therefore, the impacts would be short-term and would not be objectionable to a substantial number of people. There would be a less than significant impact, and this topic will not be further evaluated in Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial does not propose any land uses identified in the SCAQMD's *Air Quality Handbook* as associated with odor complaints (SCAQMD 1993). Short-term construction activities for the Project with Building A Residential/Commercial would be nearly identical to the Project's construction activities, except for differences associated with the interior buildout of Building A. Therefore, as for the Project, odors from construction activities would be temporary and dissipate rapidly. This topic will not be further evaluated in the Draft EIR.

2.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modification, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

The Project site is located in an urbanized area of the City and is currently developed with several buildings, parking lots, and other disturbed/developed areas. Existing groundcovers, shrubs, and trees within the site would be removed during Project construction. Due to the urbanized and disturbed nature of the Project site, the site does not support habitat for candidate, sensitive, or special status species in local or regional plans, policies, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Thus, no impact on sensitive species would occur with the Project. This issue will not be further evaluated in the Draft EIR. Tree removals are discussed further below under Threshold 2.4(e).

Project with Building A Residential/Commercial

As discussed for the Project above, the Project site is in an urbanized area and is fully developed. No impact on sensitive species would occur and this issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

As discussed above in Threshold 2.4(a), the Project site is in a highly urbanized area. Review of aerial photographs by qualified biologists shows that there are no natural drainage streams or open channels on the Project site. There are no riparian or other sensitive natural vegetation communities located on the site. Therefore, implementation of the Project would not result in an adverse impact to riparian habitat or other sensitive natural communities, and no impact would occur. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project site is in an urbanized area, and there are no sensitive natural vegetation communities on the site. No impact on sensitive natural communities would occur and this issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

As discussed above in Threshold 2.4(a), the Project site is located in a highly urbanized area. There are no drainages, including jurisdictional waterways, located on the site, and no impact would occur. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project site is in an urbanized area and there are no drainages on the site. No impact on jurisdictional waterways would occur, and this issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

Wildlife corridors and habitat linkages are features that promote habitat connectivity and are generally characterized as undisturbed canyon and riverine stream habitat areas. The Project site does not serve as a key wildlife movement corridor due to its disturbed and developed nature and the presence of roads, railroad tracks, and urban development around the Project site. The Project site is developed with several buildings, with the Metro L (Gold) Line tracks located adjacent and parallel to the western Project boundary. South Arroyo Parkway and California Boulevard, bordering the eastern and southern site boundaries,

respectively, are major arterials in the City. The developed and disturbed character of the Project site and major transportation corridors on three site boundaries impede wildlife movement through the Project site. As a result, the Project site supports the movement of almost exclusively local, urban-adapted wildlife, that also readily use surrounding areas.

Construction activities would create dust and noise within and adjacent to the work areas. During active construction, wildlife movement may be deterred by noise and human activity; however, most wildlife movement in the Project area would occur at night while construction activities would occur during the day. Direct and indirect impacts, such as noise pollution and human activity, are considered adverse but less than significant since the inability to use the site or immediately surrounding areas for local movement during construction activities would affect a small number of individuals representing an extremely small percentage of the overall regional populations. As a result, there would not be a substantial adverse effect on regional wildlife movement or regional wildlife populations. Therefore, the Project would not substantially affect the movement of any native resident or land-based wildlife species.

The Migratory Bird Treaty Act (MBTA) prohibits activities that result in the direct take (defined as killing or possession) of a migratory bird. Additionally, Sections 3503 and 3503.5 of the *California Fish and Game Code* make it unlawful to take, possess, or destroy the nests and eggs of birds of prey. Section 3513 of the *California Fish and Game Code* duplicates the federal protection of migratory birds and prohibits the taking and possession of any migratory non-game bird, as designated in the MBTA. To ensure that construction activities comply with the MBTA and the *California Fish and Game Code*, the City of Pasadena would apply the following condition of approval to the Project.

If construction is initiated during the breeding season for nesting birds (i.e., March 1–September 15) and nesting raptors (i.e., January 1–July 31), the Project Applicant shall perform, or direct the performance of, a pre-construction survey for nesting birds and/or raptors shall be conducted by a qualified Biologist within three days prior to any construction activities on the Project site and in the immediately surrounding area (i.e., perform survey within 300 ft for nesting birds and within 500 ft for nesting raptors). A qualified Biologist shall be knowledgeable and experienced in conducting nesting bird surveys within Southern California and in determining appropriate buffer size to prevent bird nesting failure. If the Biologist does not find any active nests in or immediately adjacent to the Project site, construction work shall be allowed to proceed and no further action is required.

If the Biologist finds an active nest in or immediately adjacent to the Project site and determines that the nest may be impacted or breeding activities substantially disrupted due to planned construction activities, the Biologist shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by a qualified Biologist: (1) construction limits shall be established within a buffer around any occupied nest (the buffer shall be 25–100 ft for nesting birds and 300–500 ft for nesting raptors), unless otherwise determined by a qualified Biologist and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by a qualified Biologist. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. Construction in a buffer area can proceed when the qualified Biologist has determined that fledglings have left the nest or the nest has failed.

If construction activities are initiated during the non-breeding season, there would be no potential impact to nesting birds and raptors. Therefore, with implementation of the Project feature described above, which would be ensured as a condition of approval, potential impacts to nesting migratory birds and raptors during

their breeding seasons due to Project construction would be less than significant, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the developed and disturbed character of the Project site and major transportation corridors on three site boundaries impede wildlife movement through the Project site. As a result, the Project site supports the movement of almost exclusively local, urban-adapted wildlife, that also readily use surrounding areas. Short-term construction activities for the Project with Building A Residential/Commercial would be nearly identical to those of the Project, except for differences associated with the interior buildout of Building A. Therefore, as with the Project, the Project with Building A Residential/Commercial would not substantially affect the movement of any native resident or land-based wildlife species. The same steps to ensure that construction activities comply with the MBTA and the *California Fish and Game Code* described for the Project would apply to construction of the Project with Building A Residential/Commercial. With implementation of the above described above, potential impacts to nesting migratory birds and raptors during their breeding seasons due to Project with Building A Residential/Commercial construction would be less than significant. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The only local ordinance protecting biological resources in the City of Pasadena is “City Trees and Tree Protection Ordinance” (codified in Chapter 8.52 of the PMC). This ordinance was set forth with the goal of protecting landmark, native, and specimen trees so that the tree canopy cover in the City is preserved and expanded. A *City of Pasadena Tree Inventory* (Tree Inventory) was prepared for the Project by Carlberg Associates (Carlberg Associates 2021). As summarized in Table 2-1, Tree Inventory Summary, on the following page, a total of 40 trees were inventoried on the Project site and the adjacent public right-of-way (ROW). Of these, 17 trees located in the ROW are protected under the City Ordinance. The remaining 23 trees are located within the Project site and are not protected. The proposed Project would result in the removal of 23 trees on the Project site and 2 street trees (ST32 and ST38). The remaining 15 protected streets trees in the ROW would be protected in place during construction and remain after the Project is implemented.

The Urban Forestry section of the City’s Public Works Department typically requires a fee, dependent on the size of the tree(s) being removed, to be remitted into the City’s street tree fund. For the Project, a planned condition of approval calls for planting of one new street tree along both Arroyo Parkway and California Boulevard. The Project would also include a total of 25 trees in above-grade planters within the site. With compliance with the Project’s conditions of approval, the Project would not conflict with the applicable local ordinance. There would be a less than significant impact. This issue will not be further evaluated in the Draft EIR.

**TABLE 2-1
TREE INVENTORY SUMMARY**

Tree ID	Tree Species		Protected Tree?	Disposition
	Common Name	Scientific Name		
Trees on Private Property				
1	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
2	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
3	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
4	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
5	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
6	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
7	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
8	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
9	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
10	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
11	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
12	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
13	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
14	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
15	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
16	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
17	African fern pine	<i>Afrocarpus falcatus</i>	No	Remove
18	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
19	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
20	queen palm	<i>Syagrus romanzoffiana</i>	No	Remove
21	Canary island pine	<i>Pinus canariensis</i>	No	Remove
22	Canary island pine	<i>Pinus canariensis</i>	No	Remove
23	pecan	<i>Carya illinoiensus</i>	No	Remove
Trees in Public Right-of-Way				
ST24	camphor	<i>Cinnamomum camphora</i>	Yes	Preserve and Protect
ST25	weeping fig	<i>Ficus benjamina</i>	Yes	Preserve and Protect
ST26	date palm	<i>Phoenix dactylifera</i>	Yes	Preserve and Protect
ST27	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Preserve and Protect
ST28	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Preserve and Protect
ST29	date palm	<i>Phoenix dactylifera</i>	Yes	Preserve and Protect
ST30	date palm	<i>Phoenix dactylifera</i>	Yes	Preserve and Protect
ST31	date palm	<i>Phoenix dactylifera</i>	Yes	Preserve and Protect
ST32	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Remove
ST33	date palm	<i>Phoenix dactylifera</i>	Yes	Preserve and Protect
ST34	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Preserve and Protect
ST35	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Preserve and Protect
ST36	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Preserve and Protect
ST37	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Preserve and Protect
ST38	date palm	<i>Phoenix dactylifera</i>	Yes	Remove
ST39	African fern pine	<i>Afrocarpus falcatus</i>	Yes	Preserve and Protect
ST40	date palm	<i>Phoenix dactylifera</i>	Yes	Preserve and Protect
Source: Carlberg Associates. 2021 (February 3). <i>City of Pasadena Tree Inventory</i> , 555 South Arroyo Parkway, Pasadena, California 91105. Sierra Madre, CA: Carlberg Associates.				

Project with Building A Residential/Commercial

Construction of the Project with Building A Residential/Commercial would result in removal of the same existing trees and installation of the same proposed landscaping, including a requirement to plant two new street trees, as with the Project. Therefore, as discussed for the Project, above, the Project with Building A Residential/Commercial would not conflict with the City Trees and Tree Protection Ordinance. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

The proposed Project does not conflict with any Significant Ecological Areas, Wildflower Reserve Areas, or Sensitive Environmental Resource Areas, as none exists within the Project site. Neither the Project site nor the City proper is within or adjacent to an adopted Habitat Conservation Plan or Natural Community Conservation Plan. Therefore, the Project would not conflict with any regional or State plans protecting biological resources and there would be no impact. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, there are no regional or State plans protecting biological resources within the City. Therefore, the Project with Building A Residential/Commercial would not conflict with any such plans. This issue will not be further evaluated in the Draft EIR.

2.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

Two of the nine existing buildings on the site, located at 501 and 523 South Arroyo Parkway, are previously recorded as historic resources. Five of the remaining buildings on the site are more than 45 years old. Therefore, a historic resources assessment will be conducted as part of the EIR to (1) evaluate the significance of the five historic-period structures and (2) determine whether the Project would indirectly impact the two known historic resources. Potential impacts to historical resources will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, potential impacts to historic resources due to construction and operation of the Project with Building A Residential/Commercial will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The Project site is a developed area and has been previously graded and disturbed. Therefore, no surface archaeological resources are expected to be present. However, excavation into underlying native (i.e., undisturbed) soils to accommodate the subterranean parking levels has the potential to encounter unknown archaeological resources. A cultural resources study will be conducted as part of the EIR to determine whether the site has the potential to contain archaeological resources. Potential impacts to archaeological resources will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, potential impacts to unknown archaeological resources due to construction and operation of the Project with Building A Residential/Commercial will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

As discussed under Threshold 2.5(b) above, Project construction would involve excavation into native soils. Project-related earth disturbance in native soils always has the potential to unearth previously undiscovered remains, resulting in a potentially significant impact. If human remains are encountered during Project construction, those remains would require proper treatment, in accordance with applicable laws. Sections 7050.5 through 7055 of the *California Health and Safety Code* describe the general provisions for human remains. Specifically, Section 7050.5 of the *California Health and Safety Code* describes the protocols to be followed if human remains are accidentally discovered during excavation of a site. In addition, the requirements and procedures set forth in Section 5097.98 of the *California Public Resources Code* would be implemented. Specifically, if human remains are found during excavation, construction activities must stop in the vicinity of the find and in any area that is reasonably suspected to overlie adjacent remains until the County Coroner has been notified; the remains have been investigated; and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with State regulations, which detail the appropriate actions necessary in the event human remains are encountered, potential impacts would be less than significant. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, potential impacts related to encounter of unanticipated human remains due to construction of the Project with Building A Residential/Commercial would be addressed through compliance with applicable State regulations. This issue will not be further evaluated in the Draft EIR.

2.6 ENERGY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project would result in a net increase in energy demand compared to the existing condition, and construction of the Project would require use of energy as fuel and electricity. The Project's short-term and long-term use of energy will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, construction and operation of the Project with Building A Residential/Commercial would result in a net increase in energy demand. This issue will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

As discussed in Threshold 2.6(a), the Project would result in new demands for energy. The Project's consistency with applicable plans and policies related to renewable energy and/or energy efficiency will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the consistency of the Project with Building A Residential/Commercial with the applicable plans and policies related to renewable energy and/or energy efficiency will be further evaluated in the Draft EIR.

2.7 GEOLOGY AND SOILS

Information in this section is derived from the *Geotechnical Investigation, 465-577 South Arroyo Parkway, Pasadena, California* (Geotechnical Investigation) prepared by Geocon West, Inc. and dated July 2021 (Geocon 2021). The Geotechnical Investigation is provided in its entirety in Appendix A of this IS.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

The numerous faults in Southern California include active, potentially active, and inactive faults. The criteria for these major groups are based on criteria developed by the California Geological Survey (CGS) for the Alquist-Priolo Earthquake Fault Zone Program. An active fault is defined as one that has had surface displacement within Holocene time (about the last 11,700 years). A potentially active fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years) but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive. The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones (Alquist-Priolo Zones). The Project site is not within an Alquist-Priolo Zone nor is there a known active fault traversing the site (Geocon 2021). Therefore, the surface rupture of a known fault within the Project site that would result in substantial adverse effects is not considered reasonably foreseeable. There would be no impact and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project site is not within an Alquist-Priolo Zone nor is there a known active fault traversing the site (Geocon 2021). Therefore, the surface rupture of a known fault within the Project site that would result in substantial adverse effects is not considered reasonably foreseeable. There would be no impact and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?				

WHY?

Project

The Project site is located in the seismically active southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active or potentially active faults. The closest surface trace of a potentially active fault is the Eagle Rock Fault, located approximately 0.5 mile to the southwest (Pasadena 2002b). The closest surface trace of an active fault to the site is the Raymond Fault located approximately 1.2 miles to the south. Other nearby active faults are the Sierra Madre Fault Zone, Verdugo Fault, and Hollywood Fault located approximately 4.0 miles to the northeast, 4.4 miles to the west-northwest, and 5.6 miles to the west-southwest, respectively. The active San Andreas Fault Zone is located approximately 28 miles northeast of the site (Geocon 2021, Pasadena 2002b).

Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. Thrust faults are not exposed at the surface and do not present a potential surface fault rupture hazard at the site; however, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the site. The Project site is underlain at depth by the Los Angeles segment of the Puente Hills Blind Thrust (Geocon 2021).

Consistent with its location in a seismically active region, the site may be subject to strong ground shaking resulting from a major earthquake on one or more faults in the area within the lifetime of the Project. Seismic ground shaking from major earthquakes in the region is not anticipated to be greater than at any other sites in Southern California. The potential for strong ground shaking is an existing seismic hazard that affects the site, and the Project would not exacerbate this condition. Based on the site-specific seismic analysis, the Geotechnical Investigation concluded that the effects of ground shaking on the Project can be minimized if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Conformance to the seismic design criteria calculated for the Project does not constitute a guarantee or assurance that substantive structural damage or ground failure would not occur if a large earthquake occurs; the primary goal of seismic design is to protect life, not to avoid all damage, since such design may be economically prohibitive. The Geotechnical Investigation concluded the Project is feasible provided the geotechnical recommendations are incorporated into its design and construction (Geocon 2021).

Earthquake-resistant design and materials used in new construction must meet the current seismic engineering standards of the California Building Code (CBC) Seismic Zone 4 requirements (incorporated by reference in the PMC), in effect at the time of design and construction of the Project. Compliance with these standards would reduce the risk to people and structures to the maximum extent practicable under current engineering practice. The Geotechnical Investigation outlines the site- and Project-specific requirements to meet CBC standards. Therefore, the Project would not directly or indirectly cause substantial adverse effects

due to strong seismic ground shaking. There would be a less than significant impact and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, consistent with its location in a seismically active region, the site may be subject to strong ground shaking resulting from a major earthquake on one or more faults in the area within the lifetime of the Project with Building A Residential/Commercial. The Geotechnical Investigation concluded the Project, and by extension the Project with Building A Residential/Commercial, is feasible provided the geotechnical recommendations are incorporated into its design and construction (Geocon 2021). As discussed above, compliance with applicable CBC requirements would reduce the risk to people and structures to the maximum extent practicable under current engineering practice. The Geotechnical Investigation outlines the site- and Project-specific requirements to meet CBC standards. Therefore, the Project with Building A Residential/Commercial would not directly or indirectly cause substantial adverse effects due to strong seismic ground shaking. There would be a less than significant impact and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?				

WHY?

Project

Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction. The Seismic Hazard Zone Map for the Pasadena Quadrangle indicates that the site is not within an area designated as having a potential for liquefaction. Groundwater was not encountered in on-site borings drilled to a maximum depth of approximately 91 feet below ground surface (bgs). Additionally, the historic high groundwater level in the site vicinity is between approximately 50 and 100 feet bgs. Therefore, the Geotechnical Investigation concludes the potential for liquefaction to occur beneath the site is considered low (Geocon 2021).

Separate from the issue of liquefaction, the presence of groundwater or shallow, perched water or seepage can adversely affect new construction. The Geotechnical Investigation states that due to lack of groundwater encountered in on-site borings and the reported depth of historic high groundwater, groundwater is not expected to be encountered during construction or have a detrimental effect on the Project including the subterranean levels. The Geotechnical Investigation indicates that hydrostatic design of the basement level to offset potential buoyancy is not required; however, the report does suggest waterproofing of subterranean slabs and walls. The Geotechnical Investigation states it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in

impermeable fine-grained soils, which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity (Geocon 2021). There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Geotechnical Investigation concludes the potential for liquefaction to occur beneath the site is considered low (Geocon 2021). Additionally, separate from the issue of liquefaction, the Geotechnical Investigation states it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity (Geocon 2021). There would be no impact due to construction and operation of the Project with Building A Residential/Commercial, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?				

WHY?

Project

The topography at the site is gently sloping to the south and southeast. The site is not located within an area identified as a "Hillside" area or an area identified as having a potential for slope stability hazards. Additionally, the site is not identified on the Seismic Hazard Zone Map for the Pasadena Quadrangle as within an area identified as susceptible to seismically induced landslides. There are no known landslides near the site nor is the site in the path of any known or potential landslides. Therefore, the Geotechnical Investigation concludes the potential for slope stability hazards to adversely affect the site is considered low (Geocon 2021). There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Geotechnical Investigation concludes the potential for slope stability hazards to adversely affect the site is considered low (Geocon 2021). There would be no impact due to construction and operation of the Project with Building A Residential/Commercial, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction activities. Grading and other earthwork associated with Project construction may temporarily expose soils on the Project site to wind and/or water erosion. Since the Project area of earth disturbance is greater than one acre, compliance with the State Water Resources Control Board's (SWRCB's) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities³ (Construction General Permit) would be required. Pursuant to the Construction General Permit, the City would be required to prepare, or have prepared by the Construction Contractor, a Storm Water Pollution Prevention Plan (SWPPP) that would include erosion-control Best Management Practices (BMPs). There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, construction of the Project with Building A Residential/Commercial would be required to comply with the Construction General Permit, including implementation of erosion-control BMPs. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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 onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

Secondary seismic hazards related to the underlying geologic unit include several types of ground failure that can occur as a result of severe ground shaking. The probability for each type of ground failure depends on the severity of the earthquake, the site's distance from the fault, the local topography, and subsoil and groundwater conditions, among other factors. In addition, there can be soil engineering characteristics

³ Order No. 2009-0009-DWQ, NPDES No. CAS000002, adopted by the SWRCB on September 2, 2009 (effective for all project sites on July 1, 2010) and most recently amended by Order No. 2012-0006-DWQ on July 17, 2012.

inherent in the underlying sediments on a site that can adversely affect structures if not appropriately managed during construction, including subsidence, hydroconsolidation, and other forms of collapse. Liquefaction and landslides are addressed above under Thresholds 2.7(a)(iii) and 2.7(a)(iv). Lateral spreading is a phenomenon related to liquefaction. Because there is no risk of liquefaction at the site, there would be no impact related to lateral spreading and no mitigation is required.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the site (Geocon 2021).

Based on the laboratory testing of on-site soil samples, the Geotechnical Investigation concluded that the native, granular alluvial soils underlying the site are suitable for reuse as engineered fill where the grading recommendations provided in the investigation are implemented. Also, the Geotechnical Investigation determined there were no seismic or soil conditions present on the site that would preclude construction of the Project, provided all geotechnical recommendations are incorporated into the design and construction (Geocon 2021). Therefore, the Project would not be located on a site that is unstable nor would the site become unstable as a result of the Project such that there would be on- or off-site ground failure. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would not be located on a site that is unstable nor would the site become unstable as a result of the Project such that there would be on- or off-site ground failure. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

The existing site soils are considered to be “non-expansive” and to have a “very low” ($EI < 20$) expansive potential in accordance with Section 1803.5.3 of the 2019 CBC. Based on the depth of the proposed subterranean levels and granular nature of the site soils, the Geotechnical Investigation concluded the Project would not be prone to the effects of expansive soil (Geocon 2021). There would be no impact and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would not be located on a site with expansive soil. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

The Project would not involve the use of septic tanks or alternative wastewater disposal systems. There would be no impact and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would not involve the use of septic tanks or alternative wastewater disposal systems. There would be no impact and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project site is a developed area and has been previously graded and disturbed. However, excavation into underlying native (i.e., undisturbed) soils to accommodate the subterranean parking levels has the potential to encounter unknown paleontological resources. A cultural resources study will be conducted as part of the EIR to determine whether the site has the potential to contain paleontological resources. Potential impacts to paleontological resources will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, potential impacts to unknown paleontological resources due to construction and operation of the Project with Building A Residential/Commercial will be further evaluated in the Draft EIR.

2.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project would result in a net increase in the generation of greenhouse gas (GHG) emissions associated with land uses on the site. The Project's short-term and long-term GHG emissions will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would result in a net increase in GHG emissions. This issue will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

As discussed in Threshold 2.8(a), the Project would result in increased GHG emissions. The Project's consistency with applicable plans and policies related to reduction of GHG emissions, including the City of Pasadena's *Climate Action Plan*, will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would result in increased GHG emissions. The consistency of the Project with Building A Residential/Commercial with applicable GHG emissions plans and policies will be further evaluated in the Draft EIR.

2.9 HAZARDS AND HAZARDOUS MATERIALS

Information in this section is derived in part from the *Phase I Environmental Site Assessment; 465, 491, 503, 525 and 577 South Arroyo Parkway, Pasadena, California 91105* (Phase I ESA) prepared by EMG and dated April 2020 (EMG 2020). The Phase I ESA is provided in its entirety in Appendix B of this IS. The findings of the Phase I ESA would apply equally to the Project and Project with Building A Residential/Commercial because the location and general scale of proposed buildings and subterranean parking structure would be the same for both development scenarios.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

Medical and medically related land uses involve substances that are categorized as hazardous materials due to the generation of biomedical waste. These types of materials are typical of any medical facility and would not be considered acutely hazardous or unusual. Also, each proposed building would have a 50-kilovolt standby emergency engine diesel generator. Potential impacts related to the generation of biomedical waste and storage of fuel onsite will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would not generate as much biomedical waste (categorized as hazardous materials) as the Project, since only the assisted living building would generate such materials. This development scenario would instead generate a mix of non-hazardous municipal waste and biomedical waste. Like the Project, the buildings would each have a standby emergency generator. As discussed for the Project above, potential impacts related to the generation of biomedical waste and storage of fuel onsite will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

Construction of the Project would involve the use of common hazardous materials such as gasoline, oil, paints, thinners, solvents, acids, curing compounds, grease, and other chemicals that could pose risks to construction workers or lead to soil and groundwater contamination, if not properly stored, used, or disposed. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law. These materials are common to typical construction activities, and compliance with existing hazardous material regulations on the storage, use, and disposal of hazardous materials at construction sites would prevent hazards to the public or environment through reasonably foreseeable upset or accident conditions.

Given the age of the buildings on the Project site to be demolished, asbestos-containing materials (ACMs) and lead-based paint (LBP) may be present within interior and/or exterior materials and surfaces. The SCAQMD's Rule 1403 provides guidelines for the proper removal and disposal of asbestos-containing materials. In accordance with Rule 1403, structures that may contain asbestos are required to be subject to an asbestos survey by a Certified Asbestos Consultant (certified by California Occupational Safety and Health Administration [CalOSHA]) to identify building materials that contain asbestos. Under this rule, removal of asbestos must include prior SCAQMD notification; compliance with removal procedures and time schedules; asbestos-handling and clean-up procedures; and storage, disposal, and landfilling requirements. In California, asbestos abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services (DHS). In addition, CalOSHA has regulations to protect worker safety during potential exposure to asbestos under Title 8 of the *California Code of Regulations* (Section 1529 Asbestos). All demolition that could result in the release of asbestos must be conducted according to the CalOSHA standards. These standards were developed to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials. In California, lead abatement must also be performed and monitored by contractors with appropriate certifications from the California DHS. In addition, the CalOSHA has adopted regulations to protect worker safety during potential exposure to lead under Title 8 of the *California Code of Regulations* (Section 1532.1 Lead). All demolition that could result in the release of lead must be conducted according to these standards, which were developed to protect the general population and construction workers from respiratory and other hazards associated with lead exposure. Compliance with SCAQMD Rule 1403 and the CalOSHA's Title 8 regulations on asbestos and lead abatement would be a condition of Project approval and would ensure that handling and disposal of these materials is conducted safely and accident conditions during demolition activities would not be reasonably foreseeable.

As such, the transport, use, and disposal of hazardous materials required for construction and the presence of ACMs and LBP in buildings to be demolished would not present a significant hazard through reasonably foreseeable accident and upset conditions, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

Construction of the Project with Building A Residential/Commercial would involve use of the same common hazardous materials and likely generation of ACMs and LBP during demolition as the Project. As discussed for the Project above, the transport, use, and disposal of hazardous materials required for construction and the presence of ACMs and LBP in buildings to be demolished would not present a significant hazard through reasonably foreseeable accident and upset conditions with compliance with applicable federal, State, and local regulations, and no mitigation is required. This issue will not be further evaluated in the Draft EIR

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project site is within approximately one-quarter mile of the following three schools:

- Mayfield Junior School, 405 South Euclid Avenue;
- The Waverly School, 67 West Bellevue Drive; and
- Aria Montessori School, 693 South Euclid Avenue.

As discussed under Thresholds 2.9(a) and 2.9(b) above, construction and operation of the Project would involve the use of common hazardous substances, potential encounter of hazardous building materials, and use of medical and medically related materials that can be categorized as hazardous. While these materials would not be considered acutely hazardous or unusual, potential impacts to existing schools in proximity to the Project site due to hazardous emissions or handling of hazardous materials on the site will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed above under Threshold 2.8(a), while the Project with Building A Residential/Commercial would generate relatively less biomedical waste than the Project, this development scenario would still generate biomedical waste. Also, as discussed for the Project above, construction and operation of the Project would not involve the use of acutely hazardous or unusual materials. However, potential impacts to existing schools in proximity to the site related to handling of hazardous materials will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

Based on review of the Cortese List data resources, the Project site is not located on the State of California Hazardous Waste and Substances Sites List of sites published by CalEPA and compiled pursuant to Section 65962.5 of the *California Government Code* (referred to as the Cortese List). There is one site on the Cortese List located in the City of Pasadena, which is the Jet Propulsion Laboratory (CalEPA 2020).

A Phase I ESA was conducted for the Project site. The purpose of a Phase I ESA is to identify “recognized environmental conditions”, which are defined as “the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property”. Therefore, a Phase I ESA addresses the potential for site contamination due to past or present land uses and the potential for future site contamination based on current conditions on and surrounding a site. The contents of Phase I ESAs are defined by national record review requirements in accordance with both the American Society for Testing and Materials (ASTM) E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and the USEPA Standards and Practices for All Appropriate Inquiries (40 Code of Federal Regulations [CFR] Part 312). The Phase I ESA for the proposed Project was conducted in accordance with these standards.

The Phase I ESA concluded that there was one Historical Recognized Environmental Condition (REC)⁴. As part of the Phase I ESA, the review of the historical data available for the site and the regulatory database report identified that a service station, the former ARCO station located at 125 East California Boulevard, was located on the Project site from approximately the 1930s to 2002 and utilized at least three underground storage tanks (USTs). This facility was located on the southern portion of the site, the site of the current restaurant at 577 South Arroyo Parkway. An unauthorized gasoline release impacting groundwater was first reported in 1988 and soil vapor extraction operations were initiated. In 1998, three USTs were removed from the site and various soil and groundwater investigations were subsequently conducted. The station received a “no further action” letter from the Pasadena Fire Department dated May 24, 2000; however, the site also received an additional clarification letter regarding the “no further action” letter stating that while the site has complied with the regulatory requirements for the site investigation/remediation, contamination remained at the site below regulatory action levels. A Declaration of Environmental Restriction allowing access for remediation was recorded on August 21, 2002, that was to terminate 90 days after No Further Action was received. Quarterly monitoring was conducted, and 761 cy of soil was removed. The Los Angeles Regional Water Quality Control Board (LARWQCB) granted case closure on December 3, 2004, with no property use

⁴ An Historical REC is defined under ASTM E1527 – 13 as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

restrictions, activity and use limitations, institutional controls, or engineering controls. The monitoring wells were abandoned in 2005. While this site has a "no further action" status and is considered a Historical REC (EMG 2020; Appendix B), this topic will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, potential impacts related to gasoline release in 1988 at the former ARCO station creating a significant hazard to the public or the environment will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

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 Airport (formerly Bob Hope Airport), located more than 12 miles west of the Project site. Therefore, the proposed Project would not result in a safety hazard for people residing or working in the Project area, nor for people visiting the Project. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the site is not near any air facility, and development of the Project with Building A Residential/Commercial would not result in a safety hazard for people residing or working in the Project area, nor for people visiting the Project with Building A Residential/Commercial development scenario. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The City of Pasadena Emergency Operations Plan addresses the City's planned response to emergencies associated with natural disasters and technological incidents. It provides an overview of operational concepts, identifies components of the City's emergency management organization within the Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS), and describes the overall responsibilities of the federal, State, county entities, and the City for protecting life and property and ensuring the overall well-being of the population (Pasadena 2011). Further, the City maintains a SEMS/NIMS Emergency Response Plan, which addresses planned responses to emergency/disaster situations associated with natural disasters, technological incidents, and national security emergencies. In case of a disaster, the Pasadena Fire Department is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency.

Construction and operation of the Project would not place any permanent or temporary physical barriers on any existing public streets. As such, the proposed Project would not obstruct any emergency evacuation or response activities. Construction staging would not interfere with circulation along Arroyo Parkway, California Boulevard, or any other nearby roadways. Among the standard conditions of approval for the Project, the Applicant would be required to submit a Construction Staging and Traffic Management Plan to the Public Works Department and no construction truck idling or staging, material storage, or construction trailer are allowed in the public ROW. For these reasons, the proposed Project would not interfere with any emergency response or emergency evacuation plans. Potential impacts would be less than significant, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, construction and operation of the Project with Building A Residential/Commercial would not interfere with any emergency response or emergency evacuation plans as the site layout, including circulation, would be the same as the Project. Potential impacts would be less than significant, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

The Project site and surrounding area is not within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2020). Implementation of the Project would not expose people or structures to wildfire risks. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project site is not within a VHFHSZ. This issue will not be further evaluated in the Draft EIR.

2.10 HYDROLOGY AND WATER QUALITY

Information in this section is derived in part from the *Hydrology/LID Study, 555 Arroyo Parkway* (Hydrology Study) prepared by Fuscoe Engineering and dated July 2021 (Fuscoe Engineering 2021).

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The Project site is within the jurisdiction of the LARWQCB (Region 4). The Project could result in short-term, construction-related impacts to surface water quality from grading and other construction activities (e.g., erosion, spills, and leaks from construction equipment). Compliance with non-storm water management and pollution-control BMPs, as outlined in the SWPPP required for the Project consistent with the NPDES General Permit for Storm Water Associated with Construction Activities (Order No 2009-009-DWQ as amended by 2010-0014-DWQ and 2012- 0006-DWQ, NPDES No. CAS000002), would ensure the pollutant levels in runoff during construction do not violate water quality standards. Because the Project site is over one acre, Construction General Permit requirements would include the preparation of a SWPPP, implementation and monitoring of BMPs, implementation of best available technology for toxic and non-conventional pollutants, implementation of best conventional technology for conventional pollutants, and periodic submittal of performance summaries and reports to the LARWQCB.

The Project site is entirely developed, with the portion of the site south of the Whole Foods Market having a 97 percent impervious surface area. The existing buildings primarily drain runoff via roof drains that either connect to an underground curb drain or release just above the pavement or sidewalk. The storm water runoff then outfalls through sheet flow along driveways and street-adjacent curb drains onto the Arroyo Parkway sidewalk or directly connects to the municipal storm drain system. In the existing condition, storm water runoff discharges untreated into the municipal storm drain system.

In the City of Pasadena, all development and redevelopment projects must comply with the latest Los Angeles County Public Works Low Impact Development (LID) Standards Manual. The LID Standards Manual complies with the requirements of the NPDES Municipal Separate Storm Sewer (MS4) Permit for storm water and non-storm water discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4-2012-0175). The LID BMPs are engineered facilities that are designed to retain and/or biotreat runoff on a site. Per the County LID Manual, the Project is deemed a designated project because it is a redevelopment project that results in the creation or addition or replacement of 5,000 sf or more of impervious surface on a site that was previously developed. All designated projects must detain the water quality volume on-site through infiltration, evapotranspiration, water runoff harvest and use, or a combination thereof unless it is demonstrated that it is technically infeasible to do so.

The proposed on-site storm drain facilities would consist of catch basins, area drains, gutters, roof drains, pipes, and planters (biofiltration and non-biofiltration). These drains would route to either storm water infiltration facilities below the lowest basement, such as a drywell, or a detention tank before a biofiltration

planter, which would intercept the low flows and provide water quality treatment in order to meet the County LID Ordinance. In the case that biofiltration is selected for LID, pumps would be required to make the system successful. High flows and bypass flows would flow to the adjacent Arroyo Parkway either through sheet flow or the underground storm drain system overflow pipes that would connect to a parkway drain or curb drain. In the proposed condition, the site would be divided into four drainage areas that would have impervious surface areas of 94 percent, 98 percent, and 100 percent (two of the four drainage areas would be 100 percent).

The Hydrology Study prepared for the Project determined that, with implementation of the planned LID features—either infiltration or biofiltration—there would be a slight decrease in storm water runoff volumes. Table 2-2, Pre- and Post-Development Storm Water Discharges, summarizes the runoff discharges for 2-year, 5-year, 10-year, 25-year, and 50-year storm events.

**TABLE 2-2
PRE- AND POST-DEVELOPMENT STORM WATER DISCHARGES**

Drainage Area	2 Year Event	5 Year Event	10 Year Event	25 Year Event	50 Year Event
Existing (cfs)	2.84	4.80	6.20	8.14	9.27
Proposed (cfs)	3.43	5.42	6.62	8.14	9.27
LID Flow Reduction	0.80	0.80	0.80	0.80	0.80
Difference (cfs)	-0.21	-0.18	-0.38	-0.80	0.80
cfs: cubic feet per second					
Source: Fuscoe Engineering. 2021 (July). <i>Hydrology/LID Study, 555 South Arroyo Parkway</i> . Los Angeles, CA: Fuscoe Engineering. Appendix C.					

Implementation of the planned LID features would ensure both the quantity and quality of runoff discharged from the Project site would not violate LARWQCB standards or otherwise degrade surface or groundwater quality. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would implement the same LID features to manage storm water runoff as the Project. Therefore, as discussed for the Project above, implementation of the planned LID features would ensure both the quantity and quality of runoff discharged from the Project site would not violate LARWQCB standards or otherwise degrade surface or groundwater quality. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

A project can result in a significant impact on groundwater supplies if it causes a demonstrable and sustained reduction of groundwater recharge capacity or changes the potable water levels such that it reduces the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduces the yields of adjacent wells or well fields, or adversely changes the rate or direction of groundwater flow.

The Project would result in a net increase in potable water demand for indoor and outdoor use. Additionally, a finite amount of water would be used during construction for dust suppression. The sufficiency of water supplies for the Project will be further evaluated in the Utilities and Service Systems section of the Draft EIR. These potable water supplies may be in part derived from the City's groundwater sources but would not change the volume of water withdrawn from the Raymond Basin, as such withdrawal is controlled by the Raymond Basin Management Board.

Additionally, the Project would not involve an increase in impervious surfaces that would impede stormwater infiltration. As discussed under Threshold 2.10(a) above, the Project site would have a similar coverage of impervious surface area with Project implementation. Therefore, implementation of the Project would not materially affect groundwater recharge. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the sufficiency of water supplies for the Project with Building A Residential/Commercial will be further evaluated in the Utilities and Service Systems section of the Draft EIR, as these potable water supplies may be in part derived from the City's groundwater sources. The Project with Building A Residential/Commercial would result in the same post-development coverage of impervious surfaces as the Project, which is similar to the existing conditions. Therefore, as discussed, there would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Result in substantial erosion or siltation on- or off-site?				

WHY?**Project**

As discussed under Threshold 2.10(a) above, the Project site would remain largely impermeable with Project implementation. As in the existing condition, any storm water discharging from the site would enter the municipal storm drain system via Arroyo Parkway. Also, the site is not located in proximity to a stream or other drainage. Therefore, the Project would not result in substantial erosion or siltation on- or off-site. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would result in the same post-development drainage pattern as the Project. Therefore, as discussed for the Project above, the Project with Building A Residential/Commercial would not result in substantial erosion or siltation on- or off-site. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				

WHY?**Project**

As discussed under Threshold 2.10(a) above, the Hydrology Study prepared for the Project determined that, with implementation of the planned LID features—either infiltration or biofiltration—there would be a slight decrease in storm water runoff volumes. The appropriate LID features would be a requirement of building permit review and a condition of approval for the Project. The site would remain largely permeable with Project implementation, with the same general drainage pattern on the site. Therefore, the Project would

not substantially increase the rate or amount of surface runoff such that on- or off-site flooding would occur. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would implement the same LID features to manage storm water runoff as the Project. Therefore, as discussed for the Project above, the Project with Building A Residential/Commercial would not substantially increase the rate or amount of surface runoff such that on- or off-site flooding would occur. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?				

WHY?

Project

As discussed under Threshold 2.10(a) above, the Hydrology Study prepared for the Project determined that, with implementation of the planned LID features—either infiltration or biofiltration—there would be a slight decrease in storm water runoff volumes. The site would remain largely impermeable with Project implementation and would maintain the same general drainage pattern on the site as the existing condition. Therefore, the Project would not create or contribute runoff that would exceed the capacity of the municipal storm drainage system. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would implement the same LID features to manage storm water runoff as the Project. Therefore, as discussed for the Project above, the Project with Building A Residential/Commercial would not create or contribute runoff that would exceed the capacity of the municipal storm drainage system. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?				

WHY?**Project**

As discussed under Threshold 2.10(a) above, the Project site would remain largely impermeable with Project implementation. As in the existing condition, any storm water discharging from the site would enter the municipal storm drain system via Arroyo Parkway. Also, the site is not located in proximity to a stream or other drainage. Therefore, the Project would not impede or redirect flood flows. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would result in the same post-development drainage pattern as the Project. Therefore, as discussed for the Project above, the Project with Building A Residential/Commercial would not impede or redirect flood flows. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

No portions of the City are within a 100-year floodplain, as identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA FIRM panel 06037C1375F, the Project site is located in Zone X (FEMA 2008). Zone X is located outside of the special flood hazard areas subject to inundation by the one percent annual chance of flood (100-year floodplain), and no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate P-2 of the Safety Element) the Project site is not located in a dam inundation area (City of Pasadena 2002a). The City is not located in proximity to any inland bodies of water or the Pacific Ocean to be inundated by either a seiche or tsunami. Therefore, the Project would neither introduce pollutants to the site nor risk release of pollutants due to inundation, including during intense storm events. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the City is not in a 100-year floodplain nor at risk of inundation by either a seiche or tsunami. The Project site is not within a dam inundation area (City of Pasadena 2002a). Therefore, the Project with Building A Residential/Commercial would neither introduce pollutants to the site nor risk release of pollutants due to inundation, including during intense storm events. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

As discussed under Threshold 2.10(a) above, implementation of the Project would not adversely affect water quality through compliance with the Construction General Plan and LID/County MS4 requirements during construction or operation, respectively.

The Raymond Basin, the Pasadena Water and Power's (PWP's) source of groundwater, is defined by the California Department of Water Resources as a very-low priority pursuant to the 2014 Sustainable Groundwater Management Act (DWR 2019). As such, there is currently no sustainable groundwater management plan applicable to the Project site. Regardless, as discussed under Threshold 2.10(b) above, the increase in demand for potable water during construction and operation of the Project, which may be in part derived from the City's groundwater sources, would not change the volume of water withdrawn from the Raymond Basin, as such withdrawal is controlled by the Raymond Basin Management Board as an adjudicated basin. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, there is currently no sustainable groundwater management plan applicable to the site. Regardless, as discussed under Threshold 2.10(b) above, the increase in demand for potable water during construction and operation of the Project with Building A Residential/Commercial, which may be in part derived from the City's groundwater sources, would not change the volume of water withdrawn from the Raymond Basin, as such withdrawal is controlled by the Raymond Basin Management Board as an adjudicated basin. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

2.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

The Project would not physically divide an existing community, as the Project would involve the redevelopment of five adjacent parcels that consist solely of commercial land uses. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would not divide an existing community because it would involve the redevelopment of five adjacent parcels that consist solely of commercial land uses. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The primary land use planning documents that govern the Project site are the City's General Plan, the Central District Specific Plan, and the Pasadena Zoning Code. The General Plan land use designation is High Mixed Use and the site is zoned CD-6 (Central District Specific Plan, Arroyo Corridor/Fair Oaks subdistrict). No General Plan amendment is proposed as part of the Project. However, the Applicant seeks approval to rezone the site as a Planned Development (PD) district and approval of a PD Plan. The City's PD zone is a special purpose zoning district defined, pursuant to Section 17.26.020(C) of the PMC. The PD zoning district is "intended for sites where an applicant proposes and the City desires to achieve a particular mix of uses, appearance, land use compatibility, or special sensitivity to neighborhood character." The Applicant is also requesting a zoning variance for historic resources. Specifically, the Applicant is requesting an increase in allowable building height to offset the reduction in developable area due to the preservation of the two historic structures on the Project site. Consistency with the applicable plans and policies of the City and the

region (i.e., SCAG) will be further evaluated in the Draft EIR, with a focus on plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would also involve approval to rezone the site as a PD District, approval of a PD Plan, and a zoning variance for historic resources. Consistency with the applicable plans and policies of the City and the region (i.e., SCAG) will be further evaluated in the Draft EIR, with a focus on plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

2.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

No active mining operations exist in the City. There are two areas in Pasadena that have been identified by the CGS as Mineral Resource Zone 2, which is defined as areas where geologic data indicate the significant PCC-Grade aggregate resources are present. These two areas are Eaton Wash and Devil's Gate Reservoir, which were both formerly mined for aggregate (CGS 1982, 2010). Neither the Project site nor surrounding areas are presently utilized for mineral production and mining is not an allowed use in the City's zoning code. Therefore, the proposed Project would not result in the loss of an available known mineral resource with value to the region. There will be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, neither the Project site nor surrounding areas are presently utilized for mineral production and mining is not a permitted use in the City's zoning code. Therefore, the Project with Building A Residential/Commercial would not result in the loss of available known mineral resources with value to the region. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

The City's General Plan Land Use Element does not identify any mineral recovery sites within the City (Pasadena 2015b). No active mining operations exist in the City, and mining is not currently allowed within any of the City's designated land uses. Therefore, the proposed Project would not result in significant impacts from the loss of a locally important mineral resource recovery site, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, no active mining operations exist in the City, and mining is not currently allowed within any of the City's designated land uses. Therefore, the Project with Building A Residential/Commercial would not result in significant impacts from the loss of a locally important mineral resource recovery site, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

2.13 NOISE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The proposed Project would generate noise from construction activity and operational mobile (e.g., cars, trucks, ambulances) and stationary noise sources (e.g., idling vehicles and heating, ventilating, and air conditioning ([HVAC] equipment). The Applicant anticipates that there would be regular ambulance visits to the assisted care facility (approximately 10 per month). Potential impacts from temporary construction and permanent operational noise generation will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would generate noise from construction activity and operational mobile (e.g., cars, trucks, ambulances) and stationary noise sources (e.g., idling vehicles and heating, ventilating, and air conditioning ([HVAC] equipment) similar to the Project. Potential impacts from temporary construction and permanent operational noise generation will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

Depending on the type of construction activities employed, construction of the Project could generate groundborne vibration that could affect nearby buildings, including the three existing buildings to be retained on the site. Potential impacts related to generation of vibration will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, depending on the type of construction activities employed, construction of the Project with Building A Residential/Commercial could generate groundborne vibration that could affect

nearby buildings, including the three existing buildings (i.e., two historic structures and Whole Foods Market) to be retained on the site. Potential impacts related to generation of vibration will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

There are no public or private airports located within two miles of the Project site. The closest airport to the site is the Hollywood Burbank Airport (formerly Bob Hope Airport), located more than 12 miles west-northwest of the site. Accordingly, the Project would not expose people to excessive airport-related noise. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the site is not near any air facility, and development of the Project with Building A Residential/Commercial would not expose people to excessive airport-related noise. This issue will not be further evaluated in the Draft EIR.

2.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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 the extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project involves the construction and operation of medical office, commercial, and an assisted living building with both assisted living uses and independent living uses, which would result in a new permanent resident population on the Project site of up to 109 persons in the up to 95 senior housing units. While it is unlikely that all residents of the independent living units of the assisted living building would relocate to the City, for purposes of this analysis it is assumed that persons occupying the independent living units would be new residents. The City considers the independent living units within the assisted living building to be residential units because each unit would have a kitchen and areas for living and sleeping. Conversely, the assisted living uses would not have a kitchen, and are not considered residential units by the City for planning and zoning purposes. The assisted living facilities would care for up to an estimated 113 persons.

The medical office building is expected to result in 881 employees and the assisted living building is expected to result in 66 employees. The current (as of May 2021, the most recent published data) unemployment rate in the City of Pasadena is 8.4 percent and in the County of Los Angeles is 10.1 percent and has averaged 5.2 percent in the County from 2015 through 2019 (i.e., the five calendar years prior to the COVID-19 pandemic)(EDD 2021a, 2021b). Therefore, most or all of new employment positions generated by the Project are anticipated to be filled by the local labor pool in the region and would not require relocation to the City such that unplanned population growth exceeding projections would occur.

The Land Use Element of the City's General Plan identifies a total development capacity of 4,272 residential units and 2,112,000 sf of commercial land uses in the Central District (Pasadena 2015b). The Project includes 98,576 sf of independent living uses, with up to 95 residential units, 85,800 sf of assisted living uses, and 154,000 sf of medical office and commercial uses. As of May 31, 2021, building permits have been issued for 1,721 residential units and 792,757 sf of commercial land uses. Therefore, there is adequate remaining development capacity in the Central District to accommodate the Project. Furthermore, the Project site is in a developed urban area with an established roadway network and in-place infrastructure. Therefore, development of the Project and its potential employment opportunities would not require extending or improving infrastructure in a manner that would indirectly facilitate population growth. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial could result in new permanent population of up to 493 persons⁵ in the up to 197 units, and the assisted living building (Building B) could result in a permanent

⁵ Based on average household size of 2.5 for the City of Pasadena per the most recent (2019) profile of the City generated by the Southern California Association of Governments (SCAG 2019).

resident population of 109 persons in the up to 95 independent living units. As discussed in Section 1.0 of this Initial Study, based on the development cap of 87 du/acre, a total of 289 units could be constructed. Therefore, if a total of 197 units were constructed in Building A, only 92 independent living units could be constructed in Building B. Conversely, if 95 independent living units were constructed in Building B, only 194 units could be constructed in Building A. Because the dwelling units in Building A would have a higher average population (2.5 persons) than the independent living units (1.14 persons), as the more conservative approach it is assumed the Project with Building A Residential/Commercial would be implemented with 197 units in Building A and 92 units in Building B as this would result in a higher population generation. This scenario would result in a total population of approximately 664 persons in the same size buildings as the Project (338,376 sf). As with the Project, the assisted living building is expected to result in 66 employees. Under this development scenario, Building A would include a leasing/sales management office that would employ a small number of individuals and potentially employ maintenance personnel as well. As discussed above for the Project, based on the unemployment rate in the City in the five calendar years prior to the pandemic, it is expected that most or all of new employment positions generated by the Project with Building A Residential/Commercial would be filled by the local labor pool in the region and would not require relocation to the City such that unplanned population growth exceeding projections would occur.

There is adequate remaining development capacity (2,551 residential units and 1,319,243 sf of commercial land uses) in the Central District to accommodate the Project with Building A Residential/Commercial. As discussed for the Project above, development of the Project with Building A Residential/Commercial would not indirectly induce substantial population growth because the site development would not require extending or improving infrastructure, and job opportunities are not anticipated to require substantial relocation. There would be a less than significant impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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"/>

WHY?

Project

The Project site does not contain any existing dwelling units, and there are no persons currently residing at the site. Therefore, the proposed Project would not displace any people or housing. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, there are no existing dwelling units or persons residing on the site. Therefore, the Project with Building A Residential/Commercial would not displace any people or housing. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

2.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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:				
i) Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. There would be increased demand for fire protection and police protection services related to both the increased population and the increased scale of building development on the site. The Project's resident population would generate an increased demand for parks and other public facilities, such as libraries. The increased demand for these public services and whether it would result in the need for new or expanded facilities that could result in environmental impacts will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would result in increased demand for fire protection and police protection services. The increased residential population with development of the Project with Building A Residential/Commercial, which would be greater than with the Project, would generate an increased demand for parks and other public facilities, such as libraries. The increased demand for these public services and whether it would result in the need for new or expanded facilities that could result in environmental impacts will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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:				
iii) Schools?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. However, because the population would be senior individuals, there would not be an increased demand for schools. There would be no impact, and no mitigation is required. However, as discussed below, because the proposed development may involve development of a residential building that would increase demand for schools, whether this would result in the need for new or expanded facilities that could result in environmental impacts will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would result in an increased demand for schools because, unlike the assisted living building, the dwelling units in the proposed residential building under this development scenario could include families with school-age children. Therefore, the increased demand for schools and whether it would result in the need for new or expanded facilities that could result in environmental impacts will be further evaluated in the Draft EIR.

2.16 RECREATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. The Project's resident population would generate an increased demand for recreational facilities in the City and local region. The increased demand for these recreational facilities and whether they would result in the deterioration of these facilities will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would result in increased demand for recreational facilities in the City and local region. The increased residential population with development of the Project with Building A Residential/Commercial, which would be greater than with the Project, would generate an increased demand for recreational facilities. The increased demand for these facilities and whether it would result in the deterioration of these facilities will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. There would be increased demand for recreational facilities related to both the increased population and the increased scale of building development on the site. The increased demand for recreation facilities and whether it would result in the need for expanded recreational facilities that could result in environmental impacts will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would result in increased demand for recreational facilities in the City and local region. The increased residential population with development of the Project with Building A Residential/Commercial, which would be greater than with the Project, would generate an increased demand for recreational facilities. The increased demand for recreation facilities and whether it would result in the need for expanded recreational facilities that could result in environmental impacts will be further evaluated in the Draft EIR.

2.17 TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The City of Pasadena has adopted transportation performance measures and thresholds of significance to determine transportation and traffic impacts under CEQA. The performance measures and CEQA thresholds are consistent with the City's adopted General Plan and SB 743 and include Vehicle Miles Traveled (VMT) per capita, vehicle trips (VT) per capita, proximity and quality of bicycle network, proximity and quality of transit network, and pedestrian accessibility. The 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 Project would generate increased vehicle trips. Therefore, consistency of the Project with the City's plans, ordinances, and policies addressing the circulation system, specifically the City's General Plan and the City's *Transportation Impact Analysis Current Practice and Guidelines* (TIA guidelines), will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would generate increased vehicle trips. Both development scenarios would have separate transportation studies to reflect the different proposed land uses. Therefore, consistency of the Project with Building A Residential/Commercial with the City's plans, ordinances, and policies addressing the circulation system, specifically the City's General Plan and TIA guidelines, will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

Section 15064.3(b)(1) of the State CEQA Guidelines refers to evaluating transportation impacts using VMT for land use projects. The City's TIA guidelines were prepared to reflect the requirements of SB 743. The City of Pasadena Department of Transportation has prepared a transportation analysis based on the requirements of SB 743 and determined whether there would be transportation impacts pursuant to CEQA.

Specifically, the objectives of this analysis is to assess the impact the development would have on the City's transportation system by estimating incremental changes in VMT per capita, VT per capita, the Project's impact on service population proximity access to transit and bike facilities and walk accessibility score. The results of this analysis will be presented for further evaluation in the Draft EIR.

Project with Building A Residential/Commercial

The Project with Building A Residential/Commercial would generate increased vehicle trips. Both development scenarios would have separate transportation studies to reflect the different proposed land uses. The results of these analyses will be presented for further evaluation in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?

Project

The proposed Project would not involve any alterations to the configuration of existing public or private roadways, such as new lanes, curves, or crossings outside the boundaries of the Project site. The Project uses south of Whole Foods Market would have three ingress/egress points—one on California Boulevard and two on South Arroyo Parkway. These driveways would be required to comply with all applicable design standards in Section 17.46 Parking and Loading of the PMC to ensure safe circulation to and from, and within, the Project. The new driveway approaches and associated curb and gutter would be required to be built to the City's standard plans as a condition of approval. Whole Foods Market would retain the entrance on Bellevue Drive and the exit onto South Arroyo Parkway. Therefore, the Project would not increase hazards due to a geometric design feature or incompatible use. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, because the Project with Building A Residential/Commercial would have the same site plan, including circulation, as the Project, there would be no alterations to the configuration of existing public or private roadways outside the boundaries of the site. As such, the Project with Building A Residential/Commercial would not increase hazards. There would be no impact, and no mitigation is required. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The proposed Project would not involve any alterations to existing public or private roadways and would not result in the elimination of a through-route or the narrowing of any roadways outside the boundaries of the site. However, the Project would result in a greater intensity of land uses on the site, including medical and assisted living uses that would require emergency vehicles to visit on a regular basis. Therefore, the emergency access for the Project site and adjacent areas will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, because the Project with Building A Residential/Commercial would have the same site plan as the Project, including circulation, there would be no alterations to the configuration of existing public or private roadways outside the boundaries of the site. However, the Project with Building A Residential/Commercial would result in a greater intensity of land uses on the site, including assisted living uses that may require emergency vehicles to visit on a regular basis. Therefore, the emergency access for the Project site and adjacent areas will be further evaluated in the Draft EIR.

2.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) 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:				
i) 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

The Project is subject to compliance with AB 52, which requires consideration of impacts to “tribal cultural resources”, defined in Section 21074 of the *Public Resources Code*, as part of the CEQA process. AB 52 requires the City to notify any groups (who have requested notification) who are traditionally or culturally affiliated with the geographic area of a project for which a Negative Declaration, Mitigated Negative Declaration, or an EIR is required pursuant to CEQA. The AB 52 process was initiated in May 2020, and this consultation process remains ongoing at the time this IS was circulated. Therefore, the potential for the Project to cause a substantial adverse change to a listed or eligible tribal cultural resource will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the AB 52 process for site development was initiated in May 2020 and is ongoing. Because the location and scale of proposed buildings and subterranean parking structure would be the same, the results of the consultation would apply equally to both development scenarios. Therefore, the potential for the Project with Building A Residential/Commercial to cause a substantial adverse change to a listed or eligible tribal cultural resource will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) 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:				
ii) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

As discussed under Threshold 2.18(a), the AB 52 process was initiated in May 2020 and remains ongoing. Therefore, the potential for the Project to cause a substantial adverse change to a significant tribal cultural resource will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the AB 52 process for site development was initiated in May 2020 and is ongoing. Because the location and scale of proposed buildings and subterranean parking structure would be the same, the results of the consultation would apply equally to both development scenarios. Therefore, the potential for the Project with Building A Residential/Commercial to cause a substantial adverse change to a significant tribal cultural resource will be further evaluated in the Draft EIR.

2.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project would increase demand for potable water, electricity, natural gas, and telecommunications facilities and would increase the generation of wastewater. Potential impacts related to the need for new or expanded water, wastewater, and dry utilities whose construction could result in environmental impacts will be further evaluated in the Draft EIR.

As discussed in Section 2.10, Hydrology and Water Quality, the Hydrology Study prepared for the Project determined that there would be a decrease in storm water runoff volumes due to the infiltration of LID design, either infiltration or biofiltration, consistent with City and County requirements. Therefore, implementation of the Project would not result in the relocation or construction of new or expanded storm drainage infrastructure beyond that constructed on the site as part of the Project. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would increase demand for potable water, electricity, natural gas, and telecommunications facilities and would increase the generation of wastewater. Potential impacts related to the need for new or expanded water, wastewater, and dry utilities whose construction could result in environmental impacts will be further evaluated in the Draft EIR.

As discussed in Section 2.10, Hydrology and Water Quality, the Hydrology Study prepared for the Project determined that there would be a decrease in storm water runoff volumes due to the infiltration of LID design, either infiltration or biofiltration, consistent with City and County requirements. The Project with Building A Residential/Commercial would implement the same LID features to manage storm water runoff as the Project. Therefore, implementation of the Project with Building A Residential/Commercial would not result in the relocation or construction of new or expanded storm drainage infrastructure beyond that constructed on the site as part of the Project. This issue will not be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project would increase demand for potable water. The PWP has concluded the Project does not meet the thresholds to require a Water Supply Assessment pursuant to SB 610 (Sections 10910 et. seq. of the California Water Code) (Dion 2020). However, potential impacts related to the sufficiency of water supplies for the Project will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would increase demand for potable water. The PWP has concluded that this scenario also does not need the thresholds to require a Water Supply Assessment. Potential impacts related to the sufficiency of water supplies for the Project with Building A Residential/Commercial will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

The Project would increase the generation of wastewater. Wastewater from the City of Pasadena is treated by the Sanitation Districts of Los Angeles County (Sanitation Districts) at the San Jose Creek Water Reclamation Plant (WRP) next to the City of Whittier, Whittier Narrows WRP in the City of El Monte, and/or the Los Coyotes WRP in the City of Cerritos (Pasadena 2015a). Potential impacts to Sanitation Districts' facilities from the Project will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project with Building A Residential/Commercial would increase generation of wastewater. Potential impacts to Sanitation Districts' facilities from the Project with Building A Residential/Commercial will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

Construction of the Project would generate a finite volume of waste. Section 8.62 et. seq. of the PMC is the City's construction and C&D ordinance. The Project would be subject to the C&D ordinance and therefore required to divert at least 75 percent of the construction waste stream from landfill disposal. Operation of the Project would result in increased long-term generation of municipal (non-hazardous) solid waste and biowaste. Potential impacts related to landfill space, biowaste disposal, and compliance with applicable solid waste regulations will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, construction of the Project with Building A Residential/Commercial would generate a finite volume of waste that would be essentially the same as the Project. Construction of this development scenario would also be subject to the City's C&D ordinance to reduce the construction waste stream. Operation of the Project with Building A Residential/Commercial would result in increased long-term generation of municipal (non-hazardous) solid waste and biowaste. This development scenario would generate relatively more municipal waste and relatively less biowaste than the Project. Potential impacts related to landfill space, biowaste disposal, and compliance with applicable solid waste regulations will be further evaluated in the Draft EIR.

2.20 WILDFIRE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>
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 type="checkbox"/>	<input checked="" type="checkbox"/>

WHY?**Project**

The Project site and surrounding area is not within or near State Responsibility Areas or a VHFHSZ (CAL FIRE 2020). Implementation of the Project would not expose people or structures to wildfire risks. This issue will not be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed for the Project above, the Project site is not within a VHFHSZ. This issue will not be further evaluated in the Draft EIR.

2.21 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 a prior EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). The EIR is not tiered from a previous CEQA document. All documents used in the preparation of this IS are provided in Section 3.0, Initial Study Reference Documents.

2.22 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Does the project:				
a) 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 rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?

Project

As discussed in Section 2.4, Biological Resources, the Project would not significantly impact biological resources. The Project site is fully developed and highly disturbed, with minimal, ornamental vegetation on the site. The Project would not degrade the quality of the environment; would not substantially reduce the habitat of fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal community; and would not reduce the number of or restrict the range of a Rare or Endangered plant or animal.

As discussed in Section 2.5, Cultural Resources, and Section 2.18, Tribal Cultural Resources, the potential for the Project to impact the on-site historic resources and unknown historic (buried), archaeological, tribal cultural, and/or paleontological resources will be further evaluated in the Draft EIR.

Project with Building A Residential/Commercial

As discussed in Section 2.4, Biological Resources, the Project with Building A Residential/Commercial would not significantly impact biological resources. The Project site is fully developed and highly disturbed, with minimal, ornamental vegetation on the site. The Project with Building A Residential/Commercial would not degrade the quality of the environment; would not substantially reduce the habitat of fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal community; and would not reduce the number of or restrict the range of a Rare or Endangered plant or animal.

As discussed in Section 2.5, Cultural Resources, and Section 2.18, Tribal Cultural Resources, the potential for the Project with Building A Residential/Commercial to impact the on-site historic resources and unknown historic (buried), archaeological, tribal cultural, and/or paleontological resources will be further evaluated in the Draft EIR.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) 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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

Within the City of Pasadena, there are planned, ongoing, and proposed projects that may cumulatively increase environmental impacts in the Project area. These impacts are potentially significant and will be further evaluated in the Draft EIR. The Draft EIR will evaluate cumulative impacts for the Project based on buildout of the City's General Plan as the basis of growth projections.

Project with Building A Residential/Commercial

As discussed for the Project above, the Draft EIR will evaluate cumulative impacts for the Project with Building A Residential/Commercial based on buildout of the City's General Plan as the basis of growth projections.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WHY?**Project**

Construction and operation of the Project could have the potential to generate significant adverse impacts on human beings, either directly or indirectly. The Draft EIR will provide analyses of the potential impacts related to air quality, cultural resources, paleontological resources, energy, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, public services and recreation, transportation, tribal cultural resources, and utility and service systems.

Project with Building A Residential/Commercial

Construction and operation of the Project with Building A Residential/Commercial could have the potential to generate significant adverse impacts on human beings, either directly or indirectly. The Draft EIR will provide analyses of the potential impacts related to air quality, cultural and paleontological resources,

energy, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, public services and recreation, transportation, tribal cultural resources, and utility and service systems.

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