

CITY OF PASADENA
175 NORTH GARFIELD AVENUE
PASADENA, CA 91101-1704

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 (EAF) and supporting data constitute the Initial Study for the subject project. This Initial Study provides the assessment for a determination whether the project may have a significant effect on the environment.

SECTION I – PROJECT INFORMATION

1. Project Title: Evanston Court Residential Project
2. Lead Agency Name and Address: City of Pasadena
175 N. Garfield Avenue, Pasadena, CA 91101-1704
3. Contact Person and Phone Number: Mark Odell, (626) 744-7101
4. Project Location: 377–395 South Marengo Avenue (northwest corner of Evanston Place), Pasadena, Los Angeles County, CA 91105
(See Figures 1 and 2)
5. Project Sponsor’s Name and Address: Evanston Development LLC, Pasadena, CA 91103
6. General Plan Designation: Medium-High Density Residential
7. Zoning: RM-32
8. Description of the Project:

The proposed project consists of a 24-unit, multi-family residential development that includes adaptive reuse of the historic Evanston Inn (385 South Marengo Avenue), which is listed in the National Register of Historic Places. The proposed project would rehabilitate the Evanston Inn structure into 10 condominium units and construct three new two- and three-story residential buildings comprising the remaining 14 units over a semi-subterranean parking garage.

The rear “carriage house” portion of the Evanston Inn and two single-family houses on the adjacent property to the north (377–379 South Marengo Avenue) would be demolished or relocated to accommodate the development (the applicant is currently advertising the properties for sale and relocation). For more information and analysis of the historicity of the project site, structures, and analysis of impacts and required mitigation measures, please refer to Section 7 of this Initial Study (Cultural Resources), as well as the technical studies completed by professional architectural historians that are included in **Appendix C**.

The main components of the proposed project are as follows:

- 24 multi-family residential units covering 16,569 square feet of footprint (31,818 square feet of building space)

- 10,330 square feet of hardscape
- 14,238 square feet of landscape including the planting of 38 trees
- 16,717 square feet parking garage (53 spaces)
- Vehicular access provided by a new driveway on Evanston Place
- Removal of 2,909 square feet of buildings and 130 cubic yards of concrete
- Maximum height of new residential units of approximately 49 feet 9 inches

Figures 1 through 4 attached to this Initial Study include maps of the project site, photos of the existing Evanston Inn, and site plans and elevations of the proposed project.

Discretionary Approvals

The proposed project will require the following actions and discretionary approvals by the City of Pasadena:

- Concept Design Review and Approval, including requested waivers from the following development standards (see question 13(b) in the Land Use and Planning section below for additional information):
 - Height would exceed the limit of 24'/32' from the highest ridgeline for front 60%
 - Height would exceed the limit of two-stories over the entire site for sites with a combined street frontage of over 160 feet
 - Minimum Setback for new structure on South Marengo would not be met
 - Minimum area of main garden would not be met
 - Main garden rectangular shape requirement would not be met
 - Minimum total garden size would not be met
 - Requirement for six tree wells in the main garden that extend down through the parking structure to natural grade would not be met
- Private Property Tree Removal Findings
- Tentative Tract Map Approval
- Adoption of a Mitigated Negative Declaration for CEQA Compliance

9. Surrounding Land Uses and Setting:

The project site is located at 377–395 South Marengo Avenue in Pasadena. The site is located north of Evanston Place where it intersects with South Marengo Avenue and comprises two assessed parcels (APN's 5722-015-001 and 5722-015-012) totaling approximately 32,600 square feet (0.75 acres) in size. As previously noted, the site is currently occupied by the abandoned Evanston Inn and two single-family houses to the north. **Figure 2** provides an aerial photograph of the site and photographs of onsite structures are shown in **Figure 3**.

The project site is surrounded by a two-story multifamily residential complex to the north, a one-story commercial (office) complex to the south (across Evanston Place), one- and two- story residential uses to the east (across Marengo Avenue), and the three-story Pasadena Inn to the west. This part of Pasadena is the southern edge of what is generally referred to as “downtown,” and the site is situated amidst (albeit not technically within) the City's Central District Specific Plan Area. The site lies approximately two blocks southeast of the Old Pasadena Historic District, which is listed in the National Register of Historic Places. The Foothill Freeway (I-210) is located to the north, South Arroyo Parkway is to the west, South Los Robles Avenue is to the east, and East California Boulevard is to the south. The Los Angeles County Metropolitan Transportation Authority (Metro) Del Mar Gold Line Light Rail Station is located less than a quarter of a mile to the northwest of the project site. Some destinations within walking distance of the project site include Central Park (3 blocks northwest), the Paseo Colorado outdoor mall (4 blocks north), and Pasadena City Hall (6 blocks north).

10. Other public agencies whose approval is required: No specific discretionary approvals from outside agencies are currently known by the City of Pasadena to be required. However, permits and approvals from outside agencies may become necessary as additional information becomes available.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

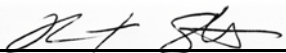
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

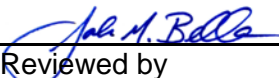
DETERMINATION: (to be completed by the lead agency)

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.	X
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT (EIR) 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 _____

December 13, 2013
 Date


 Reviewed by _____
 Date

Bob Stark, Consultant
 Printed Name

John Bellas, Environmental Coordinator
 Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____
 Date

Adoption attested to by: _____
 Signature

 Date

 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 Environmental Impact Report (EIR) is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, Earlier Analysis, may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 21 at the end of the checklist.
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant with Mitigation 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.

Potentially Significant Impact

Significant Unless Mitigation Is Incorporated

Less Than Significant Impact

No Impact

SECTION II – ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND

Date checklist submitted: December 2013

Department requiring checklist: Design & Historic Preservation Section

Case Manager: Mark Odell

2. ENVIRONMENTAL IMPACTS (explanations of all answers are required):

Potentially Significant Impact

Significant Unless Mitigation Is Incorporated

Less Than Significant Impact

No Impact

3. AESTHETICS. Would the project:

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

WHY? The project site is located within Pasadena's urban core, surrounded by commercial, retail, and medium-density residential land uses. The Evanston Inn building, at three stories tall, is a prominent structure amidst surrounding one- and two-story buildings. Scenic vistas (San Gabriel Mountain views) are generally not present in the immediate vicinity of the project site from South Marengo Avenue, due to an intervening mature street tree canopy. New residential buildings proposed behind and adjacent to the existing main Evanston Inn structure to be renovated will reach a maximum height of approximately 50 feet and scaled so as not to be viewable from the sidewalk in front of the Evanston Inn. Because the height limit in the RM-32 zone is 32 feet and the proposed project would exceed that height, review and approval by the Design Commission is required. However, the completed project would result in little to no change with regard to scenic vistas, and impacts would be considered less than significant.

b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

WHY? The only designated state scenic highway in the city is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the city. The project site is not within the viewshed of the Angeles Crest Highway and not along any scenic roadway corridors identified in the City's General Plan documents. Therefore, the proposed project would have no impacts to state scenic highways or scenic roadway corridors.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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c. *Substantially degrade the existing visual character or quality of the site and its surroundings?*

WHY? The project would generally result in a beneficial effect to the visual character and quality of the site and surroundings, as it would renovate a dilapidated, vacant historical structure, develop new residential units that are designed to be compatible with the historic Evanston Inn and the surrounding neighborhood, and include substantial landscaping. The overall building design, massing, and level of articulation complement the existing historical resource and the surrounding neighborhood. Overall, the project would have a beneficial effect.

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

WHY? A potentially significant impact would occur if light and glare substantially altered the character of off-site areas surrounding a project or interfered with the performance of an off-site activity. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

The existing neighborhood is typical of urban areas, exhibiting moderate levels of interior and exterior lighting for security, parking, and landscaping. The streets in the area are lined with light fixtures for visibility and safety purposes, and traffic on these streets also contributes to overall ambient lighting levels. There are no unique lighting components of the project or building materials that would be expected to generate glare. The proposed project would generate light consistent with the surrounding neighborhood and would not adversely affect day or nighttime views. Resulting impacts are considered less than significant.

4. AGRICULTURE AND FOREST 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. 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 nonagricultural use?*

WHY? 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, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No impacts to

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur as a result of the proposed 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? The city has no land zoned for agricultural use other than commercial growing areas. Commercial growing area/grounds are permitted in the CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally permitted in the RS (Residential Single-Family) and RM (Residential Multi-Family) districts. Pasadena has no Williamson Act contract land. No agricultural uses exist within the proposed project area; therefore, no impacts would occur with regard to Williamson Act contract lands or agricultural zoning.

c. Conflict with existing zoning for, or cause rezoning of, forestland (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"/>
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WHY? There is no timberland or Timberland Production zone in the city. Although the City's Green Space, Recreation, and Parks Element (updated November 5, 2007) identifies areas of "wild open space" and "undeveloped lands" within the city, the project site is located in an urbanized area. Therefore, the proposed project would not result in the loss of forestland, timberland, or Timberland Production areas, and no impacts would occur.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? As discussed above, there is no forestland in the city; therefore the proposed project would not result in the conversion or loss of forestland. No impacts would occur.

e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? As discussed above, there is no farmland in the city; therefore the proposed project would not result in the conversion of farmland to a nonagricultural use. No impacts would occur.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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5. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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?

WHY? The city is within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east and by the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD). The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The air quality in the SCAB does not meet the ambient air quality standards for ozone, coarse particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), nitrogen oxide (NO_x), and lead so is therefore classified as a nonattainment area for these pollutants. The SCAQMD is required, pursuant to the federal Clean Air Act, to reduce emissions of the air pollutants for which the basin is in nonattainment.

In order to reduce emissions for which the SCAB is in nonattainment, the SCAQMD (2012) has adopted the 2012 Air Quality Management Plan (AQMP), which establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2012 AQMP is a regional and multi-agency effort including the SCAQMD, the California Air Resources Board (CARB), the Southern California Association of Governments (SCAG), and the US Environmental Protection Agency (EPA).

The 2012 AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including the 2012 Regional Transportation Plan/Sustainable Communities Strategy, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. (SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans.) The project is subject to the SCAQMD's Air Quality Management Plan. (The SCAQMD considers projects that are consistent with the AQMP, which is intended to bring the basin into attainment for all criteria pollutants, to also have less than significant cumulative impacts.)

Criteria for determining consistency with the AQMP are defined by the following indicators:

- Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The proposed project will not exceed the assumptions in the AQMP.

The violations to which Consistency Criterion No. 1 refers are the California ambient air quality standards (CAAQS) and the national ambient air quality standards (NAAQS). As evaluated under Issue b) below, the project will not exceed the SCAQMD short-term construction thresholds or SCAQMD long-term operational thresholds and, thus, will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards. Additionally, the analysis for long-term local air quality impacts showed that future carbon monoxide (CO) concentration levels along roadways and at intersections affected by project traffic will not exceed the 1-hour and 8-hour state CO

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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pollutant concentration standards. Thus, a less than significant impact is expected, and the project would be consistent with the first criterion.

In regards to Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts. The proposed project is consistent with the land use designation and development density presented in the City of Pasadena's General Plan and therefore would not exceed the population or job growth projections used by the SCAQMD to develop the Air Quality Management Plan. Thus, no significant impact would occur, as the project is consistent with both criteria.

b. Violate any air quality standard or contribute to an existing or projected air quality violation?

WHY? As discussed above, the project site and the city are located in the SCAB, which is considered nonattainment for certain criteria pollutants. Because the project would involve grading and other construction activities, as well as result in more intensive uses of the project site, it would contribute to regional and localized pollutant emissions during construction (short-term) and project occupancy (long-term). The project's potential impacts from construction and operation to violate any air quality standard or contribute to an existing or project air quality violation have been evaluated as follows.

Construction Emissions

Construction associated with the proposed project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern in the project area include ozone-precursor pollutants (i.e., reactive organic gases (ROG and NO_x) and PM₁₀ and PM_{2.5}. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

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

The duration of construction activities associated with the proposed project, including the demolition of the existing buildings, is estimated to last one year. Construction-generated emissions associated with the proposed project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Modeling was based primarily on the default settings in the computer program for projects in the SCAB region. Predicted maximum daily construction-generated emissions for the proposed project are summarized in **Table 1**.

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

**TABLE 1
CONSTRUCTION-RELATED CRITERIA POLLUTANT AND PRECURSOR EMISSIONS – MAXIMUM POUNDS PER DAY**

Construction Activities	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO ₂)	Coarse Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Pounds per Day						
Demolition, Rehabilitation, and Construction of Proposed Project	14.86	41.50	31.04	0.04	7.37	4.34
SCAQMD Potentially Significant Impact Threshold	75 pounds/day	100 pounds/day	550 pounds/day	150 pounds/day	150 pounds/day	55 pounds/day
Exceed SCAQMD Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2013.2.2. Projected emissions account for demolition activities associated with pulling down and disposal of three existing structures as well as all existing pavement on-site. Proposed rehabilitation/renovation activities accounted for in model as new construction, which is conservative. Building construction, site paving, and painting activities assumed to occur concurrently. Refer to Appendix A for model data outputs.

As shown, all criteria pollutant emissions would remain below their respective thresholds and therefore would represent a less than significant impact.

Localized Construction Significance Analysis

As part of the SCAQMD’s environmental justice program, attention has been focused on localized effects of air quality from construction activities. SCAQMD staff has developed localized significance threshold (LST) methodology that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts during construction (SCAQMD 2008). LSTs represent the maximum emissions from a project that will not cause or substantially contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). The project site is located within SRA 8.

The pollutant emissions analyzed under the LST methodology are nitrogen dioxide (NO₂), CO, PM₁₀, and PM_{2.5}. LSTs for NO₂ and CO are derived by adding the incremental emission impacts from the project activity to the peak background NO₂ and CO concentrations and comparing the total concentration to the most stringent ambient air quality standards. The most stringent standard for NO₂ is the 1-hour state standard of 18 parts per hundred million and for CO is the 1-hour and 8-hour state standards of 9 parts per million (ppm) and 20 ppm, respectively. For PM₁₀ and PM_{2.5}, the localized significance thresholds are derived using an air quality dispersion model to reverse-calculate the emissions that would be necessary to worsen an existing violation in the specific source receptor area, using the allowable change in concentration thresholds approved by the SCAQMD. For PM₁₀ and PM_{2.5}, the approved 24-hour concentration thresholds for construction are 10.4 µg/m³.¹

According to the LST methodology, only on-site emissions need to be analyzed. Emissions associated with hauling, vendor trips, and worker trips are mobile source emissions that occur off-site and need not be considered according to LST methodology, since they do not contribute to isolated local concentrations of air pollution. The SCAQMD (2009) has provided LST lookup tables (i.e., screening thresholds) and sample construction scenarios to allow users to readily determine if the daily emissions for proposed construction activities could result in significant localized air quality impacts. The LST screening thresholds are estimated

¹ µg/m³ = microgram per cubic meter

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

for each SRA using the maximum daily disturbed area (in acres) and the distance of the project to the nearest sensitive receptors (in meters). Sensitive receptors in the project vicinity include residences to the east and north of the project site. The closest receptor distance on the LST look-up tables is 25 meters. According to the LST methodology, projects with boundaries closer than 25 meters to the nearest receptor should use screening thresholds for receptors located at 25 meters. Less than 1 acre is anticipated to be disturbed with implementation of the project; thus, LST screening thresholds for a 1-acre site are applicable to the proposed project.

**TABLE 2
UNCONTROLLED CONSTRUCTION LOCAL SIGNIFICANCE THRESHOLD IMPACTS – POUNDS PER DAY**

Emissions Source	Nitrogen Oxide	Carbon Monoxide	PM ₁₀	PM _{2.5}
On-Site Demolition Emissions	30.47	22.19	4.94	2.27
On-Site Site Preparation Emissions	27.16	17.09	7.28	4.31
On-Site Grading Emissions	22.17	14.16	6.12	3.63
LST Threshold (one-acre of disturbance, receptors within 25 meters) ¹	69	535	4	3
Significant Emissions?	No	No	Yes	Yes

¹ Source: SCAQMD 2009. **Bolded** numbers represent emissions projections that exceed applicable thresholds.

Table 2 shows that the emissions of these pollutants on the peak day of construction could potentially result in significant concentrations of particulate matter (PM) pollutants at nearby sensitive receptors. Therefore, significant impacts could occur concerning PM localized significance thresholds during construction activities. However, the proposed project would be subject to SCAQMD rules and regulations. The SCAQMD is responsible for adopting and enforcing rules and regulations concerning air pollutant sources, and all development projects are subject to SCAQMD rules and regulations in effect at the time of construction.

The following is a list of noteworthy SCAQMD rules that are required of the proposed project during construction activities:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement Best Available Control Measures for all sources and all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM₁₀ emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM₁₀ suppression techniques are summarized below.
 - a. Portions of the construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
 - b. All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

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

- c. All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- d. The area disturbed by clearing, grading, earth moving, or excavation operations will be minimized at all times.
- e. Where vehicles leave the construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

Table 3 presents on-site construction emissions with implementation of Rule 403, specifically the requirement of periodic watering of all on-site roads.

**TABLE 3
RULE 403 CONTROLLED CONSTRUCTION LOCAL SIGNIFICANCE THRESHOLD IMPACTS – POUNDS PER DAY**

Emissions Source	Nitrogen Oxide	Carbon Monoxide	PM ₁₀	PM _{2.5}
On-Site Demolition Emissions	30.47	22.19	3.10	1.99
On-Site Site Preparation Emissions	27.16	17.09	3.74	2.51
On-Site Grading Emissions	22.17	14.16	3.12	2.09
LST Threshold (one-acre of disturbance, receptors within 25 meters) ¹	69	535	4	3
Significant Emissions?	No	No	No	No

¹ Source: SCAQMD 2009

As shown, the SCAQMD requirement to periodically water on-site roads of the construction site would reduce on-site emissions below LSTs.

Operational Emissions

Project-generated increases in emissions would be predominantly associated with motor vehicle use. To a lesser extent, area sources, such as the use of natural-gas-fired appliances, landscape maintenance equipment, and architectural coatings, would also contribute to overall increases in emissions.

Long-term operational emissions attributable to the proposed project are summarized in **Table 4**. At completion, the project would result in a maximum net increase of approximately 7.94 pounds per day (lbs/day) of ROG, 0.78 lbs/day of NO_x, 16.15 lbs/day of CO, 2.18 lbs/day of PM₁₀, and 1.94 lbs/day of PM_{2.5}.

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Less Than Significant Impact

No Impact

**TABLE 4
LONG-TERM OPERATIONAL EMISSIONS – POUNDS PER DAY**

Source	Emissions (pounds/day)					
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO _x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO ₂)	Coarse Particulate Matter (PM ₁₀)	Fine Particulate Matter (PM _{2.5})
Proposed Project – Summer Emissions						
Area Source	7.75	0.18	14.07	0.01	1.84	1.84
Energy Use	0.00	0.08	0.03	0.00	0.00	0.00
Mobile Source	0.17	0.49	2.04	0.00	0.33	0.09
Total	7.93	0.76	16.15	0.02	2.18	1.94
Proposed Project – Winter Emissions						
Area Source	7.75	0.18	14.07	0.01	1.84	1.84
Energy Use	0.00	0.08	0.03	0.00	0.00	0.00
Mobile Source	0.17	0.52	2.00	0.00	0.33	0.09
Total	7.94	0.78	16.11	0.02	2.18	1.94
SCAQMD Potentially Significant Impact Threshold	55 pounds/day	55 pounds/day	550 pounds/day	150 pounds/day	150 pounds/day	55 pounds/day
Exceed SCAQMD Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2013.2.2. Refer to Appendix A for model data outputs.

As shown in **Table 4**, the project's net emissions would not exceed SCAQMD thresholds for any criteria air pollutants. (Note that emissions rates differ from summer to winter. This is because weather factors are dependent on the season, and these factors affect pollutant mixing/dispersion, ozone formation, etc.) Therefore, operations emissions would not result in a significant long-term regional air quality impact.

Localized Operational Significance Analysis

The proposed project involves the construction and operation of 24 residential units. According to SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project only if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The proposed project does not include such uses. Thus, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is needed, as there would be no impact.

Impacts associated with construction and operational air quality would be considered less than significant, as SCAQMD significance thresholds for criteria emissions would not be surpassed (see **Tables 1, 2, 3, and 4**).

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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c. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

WHY? Pasadena is within the SCAB, which is an air basin that regularly exceeds ambient air quality standards (AAQS), i.e., a nonattainment area.

The proposed project may contribute to the net increase of ozone precursors and other criteria pollutants. The SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. In other words, the SCAQMD considers projects that are consistent with the AQMP, which is intended to bring the basin into attainment for all criteria pollutants, to also have less than significant cumulative impacts.² The discussion under Issue a) describes the SCAQMD criteria for determining consistency with the AQMP and further demonstrates that the proposed project would be consistent with it.

For example, as stated under Issue a), the criteria for determining consistency with the AQMP are defined by the following indicators:

- Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The proposed project will not exceed the assumptions in the AQMP.

The violations to which Consistency Criterion No. 1 refers are the CAAQS and the NAAQS. As evaluated under Issue b) above, the project will not exceed the short-term construction thresholds or long-term operational thresholds and, thus, will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards. Thus, a less than significant impact is expected, and the project would be consistent with the first criterion. Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The proposed project is consistent with the land use designation and development density presented in the City's General Plan and therefore would not exceed the population or job growth projections used by the SCAQMD to develop the Air Quality Management Plan.

As such, cumulative impacts would be less than significant per the SCAQMD significance threshold since the project would be consistent with the AQMP.

² CEQA Guidelines Section 15064(h)(3) states, "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency."

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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d. *Expose sensitive receptors to substantial pollutant concentrations?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? Sensitive land uses are generally defined as locations where people reside or where the presence of air emissions could adversely affect the use of the land. Typical sensitive receptors include residents, schoolchildren, hospital patients, and the elderly.

Air Toxics

The project would not be a source of air toxics as it only proposes residential development; residential development does not generate air toxics.

In terms of residential land uses being developed near an existing stationary source of air toxics, the issuance of SCAQMD air quality permits and compliance with all SCAQMD, state, and federal regulations regarding stationary toxic air contaminants would reduce potential stationary sources of air toxics emissions such that sensitive receptors would not be exposed to substantial air pollutant concentrations. The SCAQMD limits public exposure to air toxics through a number of programs and reviews the potential for air toxic emissions from new and modified stationary sources through the SCAQMD permitting process for stationary sources. Air toxic emissions from existing stationary sources are limited by:

- 1) SCAQMD Rule 1401, which requires that construction or reconstruction of a major stationary source emitting hazardous air pollutants listed in Section 112(b) of the Clean Air Act be constructed with Best Available Control Technology and comply with all other applicable requirements.
- 2) Implementation of the Air Toxics “Hot Spots” (AB 2588) Program.
- 3) Implementation of the federal Title III Toxics Program.

Facilities and equipment that require permits from the SCAQMD are screened from risks from toxic emissions and can be required to install Toxic Best Available Control Technology (T-BACT) to reduce the risks to below significant if deemed necessary by the SCAQMD. T-BACTs are the most up-to-date methods, systems, techniques, and production processes available to achieve the greatest feasible emission reductions for air toxics. In addition, the proposed project is not located near any existing stationary sources of air toxics. Therefore, future residential development allowed under the proposed project would not be adversely affected by stationary sources of air toxics.

Mobile sources of air toxics include freeways and major roadways, which are sources of diesel particulate matter (DPM). DPM has been listed as an air toxic by CARB. In April 2005, CARB released the *Land Use and Air Quality Handbook: A Community Health Perspective*, which offers guidance on siting sensitive land uses in proximity to sources of air toxics. The handbook recommends that sensitive land uses be sited no closer than 500 feet from a freeway or major roadway, a buffer area that was developed to protect sensitive receptors from exposure to DPM, which was based on traffic-related studies that showed a 70 percent drop in particulate matter concentrations at a distance of 500 feet from the roadway. Presumably, acute and chronic risks as well as lifetime cancer risk due to DPM exposure are lowered proportionately. Per Google Earth (2013), Interstate 210 is located approximately 2,368 feet west of the project site, and State Route 110 (South Arroyo Parkway)

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Less Than Significant Impact

No Impact

is 320 feet to the east of the site. Therefore, the site lies within the CARB-recommended buffer area, and future receptors could be negatively affected by toxic air contaminants generated on South Arroyo Parkway.

As a refinement to the CARB handbook, the Sacramento Metropolitan Air Quality Management District (SMAQMD) prepared the Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways, which was updated in March 2011. This protocol sets a screening threshold (276 per million) under which potential health risk impacts are not anticipated. The screening threshold was selected by the SMAQMD as that level of increased individual risk corresponding to a 70 percent reduction from the highest risk calculated at distances from the edge of the nearest travel lane to the nearest sensitive receptor for peak-hour traffic volumes. Use of this screening threshold is considered to be appropriate by the SCAQMD. Based on the location of the project site (approximately 320 feet west of State Route 110 at its nearest) and the peak-hour volumes (4,000) along the nearby State Route 110 segment (Caltrans 2013), the location of the project site would not exceed the thresholds identified in the refined protocol as shown in Table 5.

TABLE 5
SCREENING EVALUATION OF POTENTIAL CANCER RISK TO
PROPOSED RECEPTORS ATTRIBUTABLE TO STATE ROUTE 110

State Route 110 Peak-Hour Traffic (vehicles/hr)	Receptor Distance from Edge of Nearest Travel Lane (feet)	Incremental Cancer Risk Per Million: West	Distance Screening Threshold (276 per million) Exceeded	Project Site Distance from State Route 110	Screening Threshold Surpassed?
4,000	10	219	Not exceeded at any distance	320 feet	No
	25	188			
	50	149			
	100	105			
	200	67			
	300	51			
	400	38			
	500	32			

Source: SMAQMD 2011; Peak-Hour Traffic Source: Caltrans 2013

Table 5 shows that the location of the project site would not exceed the thresholds identified in the refined protocol; therefore, the proposed project would not result in a significant impact concerning DPM.

Carbon Monoxide

Typically, substantial pollutant concentrations of CO are associated with mobile sources (e.g., vehicle idling time). Localized concentrations of CO are associated with congested roadways or signalized intersections operating at poor levels of service (level of service E or lower). High concentrations of CO may negatively affect local sensitive receptors (e.g., residents, schoolchildren, or hospital patients). There are sensitive receptors (existing residential uses) adjacent to the project site in most directions.

As stated in subsection 19, Transportation/Traffic, the proposed project will not result in any level of service at E or lower at the traffic facilities analyzed (see Issue a in subsection 19, Transportation/Traffic). Therefore, this impact is considered less than significant since the proposed project would not result in traffic facilities operating at poor levels of service.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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e. *Create objectionable odors affecting a substantial number of people?*

WHY? The potential for the project to generate objectionable odors has been considered. Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities.

The project does not contain land uses typically associated with emissions of objectionable odors. Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts resulting from construction activity. It should be noted that any construction odor emissions generated would be temporary, short term, and intermittent in nature and would cease on completion of the respective phase of construction activity and are thus considered less than significant. It is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The proposed project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed project construction and operations would be less than significant.

6. BIOLOGICAL RESOURCES. Would the project:

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

WHY? The project site is situated within urban Pasadena. Although trees are present on the project site, no known candidate, sensitive, or special-status species exist on or in the immediate vicinity of the site, per the California Natural Diversity Database (CDFW 2013). In addition, the project site and surrounding area do not provide suitable habitat for sensitive species and the project would not directly affect or modify the habitat of any identified sensitive species. No impacts would occur.

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

WHY? As discussed above, the project site located in an urbanized area of Pasadena. The only vegetation present on-site is ornamental landscaping. The project site is not located within a biological resources area, and no riparian habitat or other sensitive natural communities are present in the project area as identified in regional plans or in regulations administered by the California Department of Fish and Wildlife or US Fish and Wildlife Service. The Final EIR for the 1994 Land Use and Mobility Elements (City of Pasadena 2004) contains

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the best available citywide documented biological resources. This EIR identifies the natural habitat areas within the city's boundaries to be the upper and lower portions of the Arroyo Seco, the city's western hillside area, and Eaton Canyon. The project is not located near any of these natural habitat areas. The proposed project would not result in any impacts on riparian habitat or other sensitive communities.

- c. *Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

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

As discussed above, the project site is in an urbanized area and does not include any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. There are no federally protected waters or wetlands, as defined by Section 404 of the Clean Water Act, on the site. No water features or other topographic depressions are present on the site that could support wetlands. No impacts to wetlands would occur as a result of the proposed 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?*

WHY? The project site is in a developed urban area that does not contain any natural areas or water features. The proposed project would not contribute to the dispersal of wildlife or result in a barrier to wildlife migration or movement. Therefore, the proposed project would have no impact to wildlife movement.

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

WHY? The City of Pasadena's Ordinance 6896, "City Trees and Tree Protection Ordinance," as amended by Ordinance No. 7184, codified in Chapter 8.52 of the Pasadena Municipal Code (PMC), aims to protect the canopy of trees in the city. The project site contains 18 private trees, 13 of which would be removed to construct the project. Of the 13 trees to be removed, 7 have been designated as "specimen trees" by a professional arborist who surveyed the property (Carlberg Associates 2013; see **Appendix B**). Since specimen trees will be removed, the ordinance requires remedy in the form of replacement trees or payment of compensatory fees up to 50 percent of the required number of replacement trees. As shown in **Figures 4o** and **4p**, 15 new 15-gallon trees, 3 new 24-inch box trees, 11 new 36-inch box trees, and 1 new palm tree totaling 20 feet in height each would be planted on-site.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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The applicant is required to submit the Court Planting Concept Plan (i.e., preliminary landscape plan), including proposed tree removals and replacement, for review and approval by the Zoning Administrator and the Design Commission. The project's Court Planting Concept Plan is required to conform to the replacement matrix of the City's Tree Protection Ordinance in order to ensure that the number and species of replacement trees are sufficient to sustain the long-term tree canopy of the site.

Conformance with the replacement matrix of the City's Tree Protection Ordinance is determined by the Zoning Administrator and the Design Commission. Per the ordinance, the number of replacement trees is based on the diameter at breast height (DBH) of the removed trees. Replacement of the removed trees is required within a reasonable period of time (typically specified as within five years). Pursuant to Section 8.52.070.A of the City's Tree Protection Ordinance, the application for a discretionary approval for the proposed project is deemed to be an application for discretionary approval of a tree removal permit.

As the project is required to comply with the City's Tree Protection Ordinance and is subject to Zoning Administrator and Design Commission approval of a tree removal permit, impacts would be less than significant.

f. Conflict with the provisions of an adopted habitat conservation plan (HCP), natural community conservation plan (NCCP), or other approved local, regional, or state habitat conservation plan?

WHY? Currently, there are no adopted habitat conservation or natural community conservation plans within the city. There are also no applicable approved local, regional, or state habitat conservation plans. Therefore, no impacts would occur as a result of the proposed project.

7. CULTURAL RESOURCES. Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?

WHY? The following discussion summarizes the analysis and findings of a historic resources report prepared for the project by GPA Consulting (2013) and peer reviewed by Historic Resources Group (HRG) on behalf of the City of Pasadena. The discussion presents an overview of the historical resources on the project site, the main issues regarding whether or not the proposed project would result in significant impacts to the historical resources, and the findings of the consulting architectural historians and the City of Pasadena. The reader is referred to **Appendix C** for additional photographs and details about the historicity of the site, research methodologies, applicable federal and state regulations, and findings.

The Evanston Inn is listed on the National Register of Historic Places and is Pasadena's only remaining wood-frame hotel from the nineteenth century. The Evanston Inn's National Register nomination includes all three buildings on the 385 South Marengo Avenue site (referred to as Buildings A, B, and C in the **Appendix C** historic resources report).

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Building A (i.e., the main Evanston Inn building), at the corner of South Marengo Avenue and Evanston Place, is the focal building on the project site and the centerpiece of the adaptive reuse component of the proposed project. Building A was constructed in 1897 in a combination of Queen Anne and American Colonial Revival styles (see **Figures 3a** and **3b**).

Building B, located to the north of and connected to Building A, was constructed in 1898 in the American Foursquare style. Building C, located to the west of and also connected to Building A, was constructed in 1897 and is referred to as the “carriage house.”

In addition to the three buildings included in the National Register nomination, the front (east) building on the adjacent site (379 South Marengo Avenue) has been found to be a contributing feature of the Evanston Inn (see **Figure 3b**). This building was constructed circa 1905 by the owner of the inn and was used as guest rooms for the inn before presumably becoming a residence for the inn’s owner, Mary Frye. While not included in the National Register nomination and not architecturally distinctive, this building appears to be eligible for listing on the National Register as a contributing feature to the Evanston Inn property.

Buildings A and B will be renovated but not removed, while Building C and the Mary Frye Residence (on the 377-379 South Marengo parcel will be removed. Thus, there are three central questions regarding the historical impacts of the proposed project: (1) whether changes to the design, materials, or context of Evanston Inn Buildings A and B would compromise its designation as a historical resource; (2) whether demolition or relocation of Building C would constitute a significant impact to that resource or the Evanston Inn historical resource as a whole; and 3) whether demolition or relocation of the 379 S. Marengo Building described above would compromise the historical designation or significance of the Evanston Inn historical resource as a whole.

The State CEQA Guidelines Section 15064.5(b)(3) expresses that impacts to historic resources are generally considered mitigated to a level of less than a significant impact if modifications conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards). These 10 Standards were issued to “...promote responsible preservation practices that help protect our Nation’s irreplaceable cultural resources.” However, under California law, compliance or non-compliance with the Standards does not necessarily dictate whether an impact to a historical resource is deemed significant under CEQA (GPA Consulting 2013, pp. 48-50). Thus, the impacts analyses summarized below take into account both the Standards and CEQA’s guidance that impacts are considered significant if the resources are materially impaired to such a degree that they would no longer be eligible for listing in the California Register (per CEQA Guidelines Section 15064.5[b]).

Buildings A and B Impacts

With respect to question 1, the consulting historians found that the exterior renovations proposed for Evanston Inn Buildings A and B would be consistent with the Standards. The rehabilitation would preserve all of the exterior features of the buildings that convey their significance and make them eligible for the California Register. The project would also remove incompatible, non-character-defining additions from the buildings’ west elevations (GPA Consulting 2013, pp. 51).

However, modifications proposed to the interior of Buildings A and B necessary to create modern condominium units would not fully conform to the Secretary’s Standards. While the historic entrances and the interior lobby spaces will remain, the proposed project will result in modifications or relocation of stairs, hallways, and other interior spaces. These modifications would not comply with Standards 1, 2, 3, and 5 (see HRG pp. 12-15 in **Appendix C** for a complete listing of the Standards and discussions of the proposed project’s compliance with each). While the interior modifications to Buildings A and B would not conform to the Secretary’s Standards, the consulting historians conclude that, “despite the proposed interior alterations, the Evanston Inn will

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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continue to convey its historic significance and will retain eligibility for listing in the National Register of Historic Places following implementation of the Project” (HRG 2013, p. 10).

As to alterations to the historical context and setting of Evanston Inn Buildings A and B, HRG concludes, “The proposed new construction is compatible with the character of the Evanston Inn, and the integrity of the historical resource will not be materially impaired by alterations to its setting caused by the Project” (HRG 2013, p. 10). Additionally, Buildings A and B themselves would be moved approximately five feet east toward South Marengo Avenue, resulting in an approximately 32-foot setback, rather than 37 feet. This slight shift in footprint would not result in a very noticeable change in setting or otherwise affect the historical significance of the resources.

Building C Impacts

With respect to question 2, the consulting historians concluded that since its National Register nomination in 1984, Building C has been altered to such a degree that it no longer conveys its historical significance and is thus no longer considered eligible for listing on the California Register. For example, a covered porch that once extended across the south side of the building has been removed, second story windows have been replaced and their proportions altered, new windows have been added where they didn’t originally exist, and an addition has been built at the northeast corner to connect it to Building A. Because of these alternations, Building C has not only lost its historically significant features, it also detracts from the historic character and setting of the Evanston Inn (HRG 2013, pp. 8–9). Thus, the removal of Building C is not considered significant.

379 S. Marengo Building Impacts

With respect to question 3, the consulting historians found that although the 379 S. Marengo Building may be eligible for listing because of its historic association with the main Evanston Inn property, it is a “small, secondary outbuilding of no architectural distinction, and it was not included in the [Evanston Inn’s] National Register designation.” Upon removal of the building, “the two primary buildings comprising the original Evanston Inn would remain and would continue to retain sufficient integrity to convey the historic significance of the property as a whole...” Because Building C is not itself a building with characteristics that merit listing on the California Register, nor is it important to the overall significance of the Evanston Inn, its removal would not constitute a significant impact (HRG 2013, p. 9).

Based on information contained in the consulting architectural historians’ reports summarized above and contained in **Appendix C**, the City of Pasadena concludes that impacts to the historical significance of the Evanston Inn will be less than significant with the implementation of the following measures that mitigate for the project’s modifications to the interiors of Buildings A and B and the removal of Building C and the 379 S. Marengo Building:

Mitigation Measure CULT-1: *The developer shall retain a qualified historic preservation consultant (meeting the satisfaction of the City’s Planning Director) to monitor project construction at project initiation, 50%, and 100% completion of construction and upon discovery of any historic fabric not previously categorized by the Historic Resources Report to ensure compliance with the Secretary of the Interior’s Standards for all exterior improvements and to ensure appropriate protection of the significant character defining features. The historic preservation consultant shall ensure that all historic resources and character defining features are treated in accordance with the project’s entitlement documents.*

Mitigation Measure CULT-2: *Prior to the issuance of any construction permits, the applicant shall prepare interior and exterior photographic documentation of Building C and the 379 S. Marengo*

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Building and the interior areas of Buildings A and B to be altered. Said photo documentation shall conform to the City of Pasadena’s “Specifications for Archival Photo Documentation of Historic Properties,” as adapted by the City from the HABS/HAER specifications of the National Park Service. The applicant shall also provide a scaled floor plan with photo location key. The photographic documentation and corresponding floor plans and photo location key shall be submitted to the City for review and approval and, upon approval, donated to suitable repositories selected by the City and retained by the City’s Planning and Community Development Department.

Mitigation Measure CULT-3: *Prior to the issuance of a Certificate of Occupancy for the project and to the satisfaction of the City, the applicant shall install commemorative signage in location(s) visible from the public right of way that identifies the Evanston Inn as an historic resource listed on the National Register of Historic Places. Signage shall consist of: 1) primary sign located in front of subject property that includes the name, dates of construction and contextual historical and architectural significance of the Evanston Inn; and, 2) secondary signs near the locations of Building C and 379 S. Marengo to name and identify locations of these demolished or re-located out buildings of the Evanston Inn.*

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

WHY? There are no known prehistoric or historic archeological sites on the project site. However, the proposed project would require excavation related to the semi-subterranean parking associated with the project. Thus, construction of the project could encounter previously undiscovered archeological resources. In the unlikely event that archaeological resources are encountered during grading or construction of the project, standard best practices would be implemented to avoid or properly excavate and record the find. The following standard mitigation measure will be included in the construction contract for the proposed project:

Mitigation Measure CULT-4: *If archaeological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until an archeologist certified by the Society of Professional Archeologists examines the site, identifies the archaeological significance of the find, and recommends a course of action. Construction shall not resume until the site archeologist states in writing that the proposed construction activities will not damage significant archaeological resources.*

With inclusion of this mitigation measure, potential impacts related to accidental discovery of archaeological resources would be less than significant.

c. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

WHY? The project site lies on the valley floor in an urbanized portion of the city. This portion of Pasadena does not contain any unique geologic features and is not known or expected to contain paleontological resources. However, the proposed project would require excavation related utility installations and grading for the proposed semi-subterranean parking level. In the unlikely event that paleontological resources are encountered during grading or construction of the project, standard best practices would be implemented to

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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avoid or properly excavate and record the find. The following standard mitigation measure will be included in the construction contract for the proposed project:

Mitigation Measure CULT-5: *If paleontological resources are encountered during project construction, all construction activities in the vicinity of the find shall halt until a paleontologist meeting the satisfaction of the Natural History Museum of Los Angeles County identifies the paleontological significance of the find and recommends a course of action. Construction shall not resume until the site paleontologist states in writing that the proposed construction activities will not damage significant paleontological resources.*

With inclusion of this mitigation measure, potential impacts related to accidental discovery of paleontological and/or unique geologic resources would be less than significant.

d. *Disturb any human remains, including those interred outside of formal cemeteries?*

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

8. ENERGY. Would the proposal:

a. *Conflict with adopted energy conservation plans?*

WHY? As adopted per PMC Section 14.04.010, the proposed project is required to comply with the amended 2010 edition of the California Green Building Standards Code. The historic structures will be rehabilitated in a manner that balances historic preservation goals with the ability to meet the same code standards. In addition, the applicant proposes to construct the project to LEED Silver-equivalent standards. Impacts would be less than significant.

b. *Use nonrenewable resources in a wasteful and inefficient manner?*

WHY? The proposed project would not use a significant amount of nonrenewable resources that would create a high enough demand for energy to require development of new energy sources. Construction of the project would result in short-term consumption of oil-based energy products. However, the additional amount of resources used would not cause a significant reduction in available supplies. Impacts due to the consumption of oil-based products would be less than significant.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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An increase in energy consumption would result from the development of new residences. The proposed project would result in the increased consumption of 305 kilowatt-hours of electrical energy per day and approximately 3,167 cubic feet per day of natural gas.³ Utility estimation calculations can be found in Appendix E of this Initial Study. These consumption rates are conservative in nature, and actual consumption is anticipated to be substantially lower given that the project will be developed to LEED Silver-equivalent standards. Energy-efficient project components may include high efficiency heating, ventilating, and air conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, insulation with a rating higher than required, and double-glazed windows. The energy conservation measures would be prepared by the developer and shown on building plans. The building plans would be submitted to Pasadena Water and Power and to the Building Official for review and approval prior to the issuance of a building permit.

The long-term impact from increased energy use by the proposed project is not significant in relationship to the number of customers currently served by the electrical and gas utility companies. Supplies are available from existing mains, lines, and substations in the area. The surrounding area is completely developed with urban uses; therefore, new infrastructure would not have to be constructed to accommodate the proposed project. The amount of resources consumed by the proposed project would result in a less than significant impact, and the existing service providers would be able to supply the resources.

Water

The proposed project would also result in an increase of approximately 6,000 gallons per day in water consumption. This number represents less than 1 percent of the total water consumption for Pasadena and would therefore represent a less than significant increase in water consumption overall within the city. During drought periods, the project must adhere to the City's Comprehensive Water Conservation Plan (CWCP) and the Water Waste Prohibitions and Water Supply Shortage Plans Ordinance, which restricts water consumption to 90 percent of expected consumption during each billing period.

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

Pasadena approved a Comprehensive Water Conservation Plan (CWCP) in 2009 that includes a variety of approaches and recommendations for achieving 10 percent, 20 percent, and 30 percent reductions in water consumption. As a long-term goal, the CWCP presupposes an initial target of reducing per-capita potable water consumption 10 percent by 2015 and 20 percent by 2020. The Water Waste Prohibitions and Water Supply Shortage Plan Ordinance also became effective in 2009 and established 13 permanent mandatory restrictions on wasteful water use activities. Statewide water demand reduction requirements also began in 2009, pursuant to the State's 20x2020 Water Conservation Plan.

Additionally, because the proposed project proposes new landscape of 2,500 square feet or more, the project is required to adhere to the requirements of the Water Efficient Landscape Ordinance that was adopted in

³ Natural gas consumption was based on the South Coast Air Quality Management District's (1993) CEQA Air Quality Handbook.

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2010. This ordinance mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. The project must adhere to all applicable provisions in this ordinance, which are contained in Title 13 (Utilities and Services) of the Pasadena Municipal Code. The ordinance may require design features that include specific plant types and the use of recycled water for irrigation.

To meet these water policy goals, a water conservation plan is required that demonstrates the proposed project’s water consumption would be 80 percent of its originally anticipated demand. With PWP and Building Division approval of this plan, the project would not have any individual or cumulative impacts on water supply. Impacts would be less than significant.

9. GEOLOGY AND SOILS. Would the project:

- a. *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

WHY? Fault rupture is caused by the actual breakage of the ground surface overlying a fault as a result of seismic activity. This can range in offsets from less than 1 inch to up to 20 feet, depending on the fault and earthquake magnitude. Under the Alquist-Priolo Act, the California State Geologist identifies areas in the state that are at risk from surface fault rupture. The main purpose of the act is to prevent construction of buildings used for human occupancy where traces of active faults are evident on the earth’s surface. These zones are known as Alquist-Priolo Earthquake Fault Zones. Impacts resulting from fault rupture generally occur within the immediate vicinity overlying the fault. The zones vary in width, but average about one-quarter mile across.

According to the Safety Element of the City’s General Plan adopted in 2002, the San Andreas Fault is a “master” active fault and controls seismic hazard in Southern California. This fault is located approximately 21 miles north of Pasadena.

The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. Alquist-Priolo maps show only one fault zone in or adjacent to the city—the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. This fault is located primarily south of city limits; however, the southernmost portions of the city lie within the fault’s mapped fault zone. The Safety Element of the City’s General Plan identifies the following three additional zones of potential fault rupture in the city:

- The Eagle Rock Fault Hazard Management Zone, which traverses the southwestern portion of the city.
- The Sierra Madre Fault Hazard Management Zone, which includes the Tujunga Fault, the North Sawpit Fault, and the South Branch of the San Gabriel Fault. This fault zone is primarily north of the city, and only the very northeast portion of the city and portions of the Upper Arroyo lie within the mapped fault zone.

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- A Possible Active Strand of the Sierra Madre Fault, which appears to join a continuation of the Sycamore Canyon Fault. This fault area traverses the northern portion of the city as is identified as a Fault Hazard Management Zone for Critical Facilities Only.

While the project site is in the seismically active region of Southern California, according to the Safety Element of the City's General Plan, the project site is not within any of these potential fault rupture zones and does not lie within a designated Alquist-Priolo Earthquake Fault Zone. The closest mapped fault zone, the Eagle Rock Fault Zone, is 2 miles southwest of the project site. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects caused by the rupture of a known fault and impacts would be less than significant.

ii. Strong seismic ground shaking?

WHY? Since the city is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood faults, any major earthquake along these systems will cause seismic ground shaking in the city. Much of Pasadena is on sandy, stony, or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains. This soil is more porous and loosely compacted than bedrock, and thus is subject to greater impacts from seismic ground shaking than bedrock.

The city is in Seismic Zone 4, which has the highest earthquake danger (California Seismic Safety Commission 2005, pp. 7 and 38). However, the risk of earthquake damage is minimized because new structures must be built according to the Uniform Building Code and other applicable codes, and are subject to inspection during construction. Structures for human habitation must be designed to meet or exceed the Uniform Building Code, California Building Code Seismic Zone 4 requirements. With the required compliance with these standards impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction?

WHY? Liquefaction typically occurs when near-surface (usually upper 50 feet) saturated, clean, fine-grained loose sands are subject to intense ground shaking. The potential for liquefaction depends on the magnitude of ground shaking, groundwater conditions, the relative density of the soils, and the age of site-specific geologic units. Seismic-induced liquefaction occurs when a saturated, granular deposit of low relative density is subject to extreme shaking and loses strength or stiffness due to increased pore water pressure. The consequences of liquefaction are typically characterized by settlement, uplift on structures, and increases in the lateral pressure of buried structures. If building foundations are not designed properly, the effects of severe liquefaction during seismic conditions may result in structural failure, leading to substantial structural damage and injury or loss of life.

The project site is not located within a Liquefaction Hazard Zone as shown on Plate P-1 of the City's General Plan Safety Element. This plate was developed considering the liquefaction areas identified on the State of California Seismic Hazard Zone maps for the city (California Department of Conservation, Division of Mines

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and Geology 1998). Therefore, the project would not result in seismic-related ground failure, including liquefaction, and impacts would be less than significant.

iv. *Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? The proposed project site is flat and located within an urbanized area of the city. In addition, the project site is not within a Landslide Hazard Zone as shown on Plate P-1 of the City's General Plan Safety Element. This plate was developed considering the earthquake-induced landslide areas identified on the State of California Seismic Hazard Zone maps for the city (California Department of Conservation, Division of Mines and Geology 1998). Therefore, no impacts from seismic-induced landslides would occur.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? Construction of the project would entail some earthwork such as grading and excavation for the semi-subterranean parking garage. The natural water erosion potential of soils in Pasadena is low, unless these soils are disturbed during the wet season. Both the Ramona and Hanford soils, which underlay much of the city, have high permeability, low surface runoff, and slight erosion hazard due to the gravelly surface layer and low topographic relief away from the steeper foothill areas of the San Gabriel Mountains.

In accordance with Clean Water Act and National Pollutant Discharge Elimination System (NPDES) requirements, water erosion during construction would be minimized by limiting construction to dry weather, covering exposed excavated dirt during periods of rain, and protecting excavated areas from flooding with temporary berms. In addition, site preparation would be conducted in compliance with the City's requirement for best management practices (BMPs) and state and local codes and requirements for erosion control, grading, and soil remediation.

Construction may temporarily expose the soil to wind and/or water erosion. Fugitive dust would be controlled in compliance with and implementation of SCAQMD Rules 403 and 1166. The following erosion control features associated with SCAQMD rules utilized during remedial activities would be employed:

- Covering stockpile with plastic sheeting.
- Covering loaded soils with secured tarps.
- Prohibiting work during periods of high winds.
- Watering exposed soils during construction.

Should construction of the proposed project require more than 250 cubic yards of cut or fill, the applicant will be required to submit an erosion and sediment transport control plan as part of the project grading plan. The grading plan is subject to review and approval by the Building Official and the Public Works Department prior to the issuance of any building permits.

With the implementation of these required erosion control features, potential impacts associated with erosion during project construction and operation would be less than significant.

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c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

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

The proposed project is not located on known unstable soils or geologic units, and therefore would not likely be susceptible to on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. As indicated above, the project area is not known to be in an area susceptible to landslide or liquefaction. Soil excavation and grading activities associated with the project would be in compliance with the City’s grading ordinance, Chapter 33 of the 2001 California Building Code related to grading and excavation, and other applicable building regulations and standard construction techniques. The displacement of soil through cut and fill will be controlled by Chapter 33 of the 2001 California Building Code related to grading and excavations. Modern engineering practices and compliance with established building standards, including the California Building Code, would ensure that potential impacts resulting from unstable geologic units or soils would be less than significant.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? According to the City’s General Safety Element Plan adopted in 2002, the project site is underlain by alluvial material from the San Gabriel Mountains. This soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential. In addition, modern engineering practices and compliance with established building standards, including the California Building Code, would reduce potential impacts to a less than significant level.

e. *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? The proposed project would connect to the existing sewer system; no septic systems and/or other alternative forms of wastewater disposal would be utilized. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable to this project. No impact would occur.

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10. GREENHOUSE GAS EMISSIONS. Would the project:

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

WHY? Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHG). The main components of GHG include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Greenhouse gases are emitted by both natural processes and human activities. In response to growing scientific and political concern with global climate change, California has adopted a series of laws to reduce emissions of GHGs to the atmosphere from commercial and private activities in the state. Construction and operation of the proposed project would generate GHG emissions. Overall, the following activities associated with the future residential development could directly or indirectly contribute to the generation of GHG emissions:

- **Construction Activities:** During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO₂, CH₄, and N₂O. Furthermore, CH₄ is emitted during the fueling of heavy equipment.
- **Gas, Electric, and Water Use:** Natural gas use results in the emissions of two GHGs: CH₄ (the major component of natural gas) and CO₂ from the combustion of natural gas. Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California’s water conveyance system is energy-intensive. Preliminary estimates indicate that the total energy used to pump and treat this water exceeds 6.5 percent of the total electricity used in the state per year.
- **Solid Waste Disposal:** Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH₄ from the anaerobic decomposition of organic materials. Methane is 21 times more potent a GHG than CO₂. However, landfill CH₄ can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.
- **Motor Vehicle Use:** Transportation associated with the proposed project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

GHG emissions associated with residential land uses would occur over the short term from construction activities, consisting primarily of emissions from equipment exhaust. There would also be long-term regional emissions associated with project-related new vehicular trips and stationary source emissions, such as natural gas used for heating and electricity usage for lighting. Preliminary guidance from the Office of Planning and Research (OPR) and letters from the Attorney General critical of CEQA documents which have taken different approaches indicate that lead agencies should calculate, or estimate, emissions from vehicular traffic, energy consumption, water conveyance and treatment, waste generation, and construction activities. The calculation presented below includes construction as well as long-term operational emissions in terms of annual carbon dioxide equivalents (CO₂e) associated with the anticipated operations of the proposed project. The resultant emissions of these activities were calculated using the CalEEMod air quality model (Appendix A). CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for the use of government agencies, land use planners, and environmental professionals.

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No Impact

Thresholds of significance illustrate the extent of an impact and are a basis from which to apply mitigation measures. On September 28, 2010, the SCAQMD conducted Stakeholder Working Group Meeting #15, which resulted in a recommended screening threshold of 3,000 metric tons of CO₂e as a threshold for all land uses. Therefore, for the purposes of this evaluation and in the absence of any other adopted significance thresholds, a threshold of 3,000 metric tons of CO₂e per year is used to assess the significance of GHG emissions.

Emissions resulting from implementation of the proposed project have been quantified and the quantified emissions are compared with the SCAQMD GHG screening threshold. The anticipated GHG emissions during project construction and operation are shown in **Table 6**. In accordance with the SCAQMD guidance, projected GHGs from construction have been quantified and amortized over 30 years, which is the number of years considered to represent the life of the project. The amortized construction emissions are added to the annual average operational emissions. Per **Table 6**, GHG emissions projected to result from both construction (amortized over 30 years) and operation of the proposed project would not exceed the SCAQMD greenhouse gas threshold of 3,000 metric tons of CO₂e per year. The impact is therefore considered less than significant.

**TABLE 6
CONSTRUCTION-RELATED AND OPERATIONAL GREENHOUSE GAS EMISSIONS (METRIC TONS PER YEAR)**

Emission Type	CO ₂ e
Construction (amortized over 30 years)	7
Indirect Emissions from Energy Consumption	180
Water Demand	26
Waste Generation	5
Area Source (hearth, landscaping)	8
Mobile Source (vehicles)	68
Operations Total	294
<i>SCAQMD Greenhouse Gas Threshold</i>	<i>3,000</i>
Threshold Exceeded?	No

Source: CalEEMod version 2013.2.2. Emission projections based on modeling software defaults for 24 townhouse/condominium units in the South Coast Air Basin during the year 2016, with the exception of vehicle trip generation, which was derived from the Transportation Assessment (LLG 2013) prepared for the project. Per SCAQMD guidance, construction emissions are amortized over 30 years, which is considered to represent the life span of residential development. Refer to Appendix A for model data outputs.

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

WHY? California has adopted several policies and regulations for the purpose of reducing GHG emissions. Assembly Bill 32, the Global Warming Solutions Act (AB 32), was enacted in 2006 to reduce statewide GHG emissions to 1990 levels by 2020. As identified under Issue a) above, the proposed project would not surpass the SCAQMD’s recommended GHG screening thresholds, which were prepared with the purpose of complying with the requirements of AB 32.

Senate Bill 375, (Linking Regional Transportation Plans to State Greenhouse Gas Reduction Goals), was enacted in 2009 with the goal of reducing GHG emissions by limiting urban sprawl and its associated vehicle emissions. Per the requirements of SB 375, SCAG created a “sustainable communities strategy” (SCS) that integrates transportation and land-use elements in order to achieve the emissions reduction target, The SCS encourages Transit Oriented Development (TOD) which places residential uses near mass transit stations to

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increase use of mass-transit and reduce vehicle trips. The proposed project is considered a TOD as it is located less than a quarter-mile from the Del Mar Gold Line Light Rail Station.

As the proposed project would not conflict with either AB 32 or SB 375, impacts would be less than significant.

11. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

WHY? The proposed project is unlikely to create a significant hazard to the public or environment through routine transport, storage, use, or disposal of hazardous materials. Construction and operation of the project would not require extensive or ongoing use of acutely hazardous materials or substances. While grading and construction activities may involve the transport, storage, use, or disposal of some hazardous materials, such as on-site fueling and/or servicing of construction equipment, activity would be short term. In addition, operation of the proposed project would not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers, and cleaning agents required for normal maintenance of the structure and landscaping. Such activities during construction and operation would be subject to federal, state, and local health and safety requirements. The storage, handling, and disposal of hazardous materials are regulated by the US Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the Pasadena Fire Department. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

- 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?*

WHY? The proposed project would not create a hazard through upset or accident conditions involving hazardous materials. The use of hazardous materials and substances at the project would be minimal, in small quantities, and would involve routine maintenance and landscaping. Use, storage, and disposal of materials and substances would be subject to federal, state, and local health and safety requirements. Hazardous materials are regulated by state, federal, and local agencies, including the EPA, the OSHA, and the Pasadena Fire Department. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions that could release hazardous material. Impacts would be less than significant.

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

WHY? The project does not involve hazardous emissions or the handling of hazardous materials, substances, or waste and is not within one-quarter mile of an existing or proposed school. The nearest school is the

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Concept Design Academy, located approximately 0.5 miles south of the project site. Rose City High School is the nearest Pasadena Unified School District school, located 0.8 miles from the project site (Google Earth 2013). Given there are no existing or proposed schools within one-quarter mile of the project site and the proposed project would not emit or handle hazardous materials, no impacts would occur.

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?

WHY? The project site is not located on the State of California Hazardous Waste and Substances Sites List of sites published by the California Environmental Protection Agency (CalEPA) (2013). The site is not known or anticipated to have been contaminated with hazardous materials, and no hazardous material storage facilities are known to exist on the project site. No impacts would occur as a result of the proposed project.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

WHY? The project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest public use airport is the Bob Hope Airport in Burbank, which is located approximately 16 miles northwest of the project site. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of an airport, and no impact would occur.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

WHY? The project site is not in the vicinity of a private airstrip. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of a private airstrip, and no impact would occur.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

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

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The construction and operation of the proposed project would not place any permanent or temporary physical barriers on any existing public streets. Construction would take place within the project site, and no roadway closures are anticipated. To ensure compliance with zoning, building, and fire codes, the applicant is required to submit appropriate plans for plan review prior to the issuance of a building permit. Adherence to these requirements would ensure that the project would not have a significant impact on emergency response and evacuation plans. No impact would occur as a result of the proposed project.

h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

WHY? As shown on Plate P-2 of the City’s General Plan Safety Element, the project site is not located in an area of moderate or very high fire hazard. In addition, the project site is surrounded by urban development and is not adjacent to any wildlands. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and no wildland fire impacts would occur as a result of the proposed project.

12. HYDROLOGY AND WATER QUALITY. Would the project:

a. Violate any water quality standards or waste discharge requirements?

WHY? A significant impact may occur if the proposed project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems such as the Los Angeles Regional Water Quality Control Board (LARWQCB).

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

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

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollutant Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated cities therein, including the City of Pasadena, obtained an MS4 (Permit # 01-182; NPDES No. CAS0041) from the

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LARWQCB, as amended in 2007. Under this MS4, each permitted municipality is required to implement the Stormwater Quality Management Plan.

In accordance with the countywide MS4 permit, all new developments must comply with the SQMP. In addition, as required by the MS4 permit, the City of Pasadena has adopted a Standard Urban Stormwater Mitigation Plan (SUSMP) ordinance to ensure new developments comply with SQMP. This ordinance requires most new developments to submit a plan to the City that demonstrates how the project will comply with the City's SUSMP.

Site preparation associated with the proposed project could temporarily increase the amount of soil erosion and siltation into area drainage systems. As part of the Clean Water Act, the EPA has established regulations under the NPDES program to control direct stormwater discharges and industrial pollutant discharges, including construction-related activities.

The proposed project consists of 24 residential units, which are not considered point source generators of water pollutants. Thus, no quantifiable water quality standards apply to the project. As an urban development, the proposed project would add typical, urban, nonpoint-source pollutants to stormwater runoff. As discussed, these pollutants are permitted by the countywide MS4 permit and would not exceed any receiving water limitations. In addition, since the proposed development meets the City's SUSMP requirement thresholds, the applicant is required to submit and implement a SUSMP compliance plan. Compliance with the MS4 permit and the SUSMP would ensure that the proposed project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

WHY? A project would normally have a significant impact on groundwater supplies if it were to result in a demonstrable and sustained reduction of groundwater recharge capacity or change the potable water levels such that it would reduce the ability of a water utility to use the groundwater basin for public water supplies or storage of imported water, reduce the yields of adjacent wells or well fields, or adversely change the rate or direction of groundwater flow.

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

The proposed project would use the existing water supply system provided by the PWP. The source of some of this water supply is groundwater, stored in the Raymond Basin. Thus, the project could indirectly withdraw groundwater. However, the proposed project's water usage would be negligible in comparison to the overall water service provided by the PWP. Under normal operation, the project would use approximately 6,000 gallons of water per day. Per the PWP, existing entitlements and sources can serve the proposed project. This minor amount of water use would not result in significant impacts from depletion of groundwater supplies.

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As noted in Issue 8.b), over the past several years, the PWP has been impacted by several factors that have restricted local and regional water supply. The PWP's groundwater rights in the Raymond Basin have been curtailed in order to mitigate groundwater depletion experienced over the last half century. With respect to imported supplies, a decade-long drought has reduced the ability to replenish regional groundwater supplies; drought conditions in the American Southwest have reduced deliveries of water from the Colorado River, and legal and environmental issues have resulted in reduced water deliveries through the State Water Project.

PMC Chapter 13.10 establishes 13 permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements, such as the 20x2020 Plan and the current work being done by the California Department of Water Resources, the SWRCB, and other state agencies, implement the State's 20x2020 Water Conservation Initiative Program.

As a result, to meet these water policy goals, the proposed project must comply with the City's Comprehensive Water Conservation Plan, PMC Chapter 13.10, and the City's objective to meet the 20x2020 goals by submitting a water conservation plan limiting the project's water consumption to 80 percent of its originally anticipated demand. Through compliance with the above requirements, the project would not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the PWP and the Building Division before the issuance of a building permit. The applicant's irrigation and plumbing plans are also required to comply with the approved water conservation plan and the City's requirements for landscape irrigation.

Because this project proposes new landscaping of 2,500 square feet or more, the project must adhere to the requirements of the Water Efficient Landscape Ordinance (PMC 13.22), which was adopted in 2010. This ordinance is a result of Senate Bill 1881, which mandates that all local jurisdictions follow specific regulations for the efficient use of water in the irrigation of landscapes. Under this ordinance, the applicant is required to prepare and submit a Landscape Documentation Package that includes a Water Efficient Landscape Worksheet, a Soil Management Report, a Landscape Design Plan, an Irrigation Design Plan, and a Grading Design Plan to demonstrate the efficient use of water in the design of the project. The provision of 14,238 square feet of landscaped area would also provide additional permeable surface to facilitate absorption and reduce surface water runoff.

The efficient use of irrigation and plant materials is also required by Chapter 17.44, Landscaping, of the Zoning Code. As discussed in Issue 8.a), the City has adopted an amended California Green Building Standards Code (PMC 14.04.500) for all new construction and tenant improvements.

Compliance with existing City requirements and the provision of green space would result in less than significant impacts on groundwater supplies.

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

WHY? The project site does not contain any streams, rivers, or other drainage features. Development of the site would involve some land alterations such as excavation and grading, but would not substantially alter the drainage pattern of the site or the surrounding area.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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The drainage of surface water from the project would be controlled by building regulations and directed toward the existing streets, flood control channels, storm drains, and catch basins. The proposed drainage of the site would not channel runoff on exposed soil, would not direct flows over unvegetated soils, and would not otherwise increase the erosion or siltation potential of the site or any downstream areas. As discussed above, the proposed project is subject to NPDES requirements, including the countywide MS4 permit and the City's SUSMP ordinance. In accordance with these requirements, the applicant is required to submit a plan to the City that demonstrates how the project will comply with the City's Standard Urban Stormwater Mitigation Plan. To comply with the SUSMP, the proposed project must implement best management practices that reduce water quality impacts, including erosion and siltation, to the maximum extent practicable. Compliance with the City's SUSMP and implementation of the required BMPs would ensure that the proposed project would not result in significant erosion or siltation impacts from changes to drainage patterns.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?

WHY? As discussed, the proposed project would involve only minor changes in the site's drainage patterns and does not involve altering a discernible drainage course. The proposed project's potential to cause flooding would be eliminated through the required compliance with the City's SUSMP ordinance. This ordinance requires post-development peak stormwater runoff rates to not exceed pre-development peak stormwater runoff rates. Compliance with this SUSMP requirement would be ensured through the City's drainage plan review and approval process.

Since the proposed project does not involve the alteration of a discernible watercourse and post-development runoff discharge rates are required to not exceed pre-development rates, the project does not have the potential to alter drainage patterns or increase runoff that would result in flooding. Therefore, the proposed project would not cause flooding and would result in less than significant impacts.

e. Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

WHY? As discussed above in Issues c) and d), compliance with the City's SUSMP ordinance would ensure that post-development peak stormwater runoff rates do not exceed pre-development peak stormwater runoff rates. Therefore, Pasadena's existing storm drain system can adequately serve the proposed development.

Similarly, as discussed above in Issues a) and c), the project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the countywide MS4 permit, and the project is required to comply with the City's SUSMP ordinance. The proposed project is required to implement BMPs to reduce stormwater pollutants to the maximum extent practicable. Therefore, the proposed project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. As a result, impacts would be less than significant.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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f. *Otherwise substantially degrade water quality?*

WHY? As discussed above, the proposed development would not be a point-source generator of water pollutants. The only long-term water pollutants expected to be generated on-site are typical urban stormwater pollutants. Compliance with the City’s SUSMP ordinance will ensure these stormwater pollutants would not substantially degrade water quality.

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

Sediments generated on the project site shall be retained using adequate treatment control or structural BMPs, as follows:

- Construction-related materials, wastes, spills, or residues shall be retained at the project site to avoid discharge to streets, drainage facilities, receiving waters, or adjacent properties by wind or runoff;
- Non-stormwater runoff from equipment and vehicle washing and any other activity shall be contained at the project site; and
- Erosion from slopes and channels shall be controlled by implementing an effective combination of BMPs (as approved in Regional Board Resolution No. 99-03), such as the limiting of grading scheduled during the wet season; inspecting graded areas during rain events; planting and maintenance of vegetation on slopes; and covering erosion susceptible slopes.

Compliance with the both the MS4 permit and the General Construction Permit would ensure that construction of the proposed project would not substantially degrade water quality.

g. *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or dam inundation area as shown in the City of Pasadena–adopted Safety Element of the General Plan or other flood or inundation delineation map?*

WHY? According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map for Pasadena, portions of the city are in a 100-year floodplain; however, the project site itself is not located within a 100-year floodplain. As shown on FEMA map Community Number 065050, most of the city is located in Zone X. A few scattered areas are located in Zone D. Both Zone X and Zone D are located outside of the “Special Flood Hazard Areas Subject to Inundation by the 1 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 3-1 of City’s General Plan Safety Element adopted in 2002), the project is not located in a dam inundation area. No impacts would occur.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

WHY? See Issue g) above. The project site is not within a 100-year floodplain identified by the FEMA Flood Insurance Rate Map. As shown on FEMA map Community Number 065050, most of the city is in Zone X, with some scattered areas in Zone D, for which no floodplain management regulations are required. Therefore, the proposed project would not place structures within the flow of the 100-year flood, and the project would have no related impacts.

i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

WHY? As discussed above, the project site and surrounding areas are not located within a 100-year flood zone. As shown on FEMA map Community Number 065050, most of the city is in Zone X, with some scattered areas in Zone D, for which no floodplain management regulations are required. In addition, according to the City’s Dam Failure Inundation Map (Plate P-2of the City’s General Plan Safety Element), the project is not located in a dam inundation area. Therefore, the project would not expose people or structures to flooding risks, including flooding as a result of the failure of a levee or dam. No impact would occur.

j. Inundation by seiche, tsunami, or mudflow?

WHY? The city and the project site are not located near any inland bodies of water or the Pacific Ocean to be inundated by either a seiche or tsunami. For mudflow, see responses to subsection 9, Geology and Soils, a.iii) and iv) regarding seismic hazards including liquefaction and landslides. No impacts would occur.

13. LAND USE AND PLANNING. Would the project:

a. Physically divide an existing community?

WHY? The project site is located in a highly urbanized area with a mix of surrounding land uses that includes residential, commercial, office, and recreational uses. The proposed project would result in the construction of 24 residential units, including the restoration of the historical Evanston Inn, and would not physically alter surrounding parcels or properties. The proposed project would not adversely impact land uses within the area or act as a physical barrier within the surrounding community, as the site is surrounded by similar development on all sides, and the project consists of an infill development in a highly urbanized area. Therefore, the proposed project would not physically divide an established community, and no impact would occur.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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b. *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

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WHY? The General Plan designation for the project site is Medium-High Density Residential, and the site is zoned RM-32. Based on the total lot size (35,824 square feet), a maximum density of 26 units is permitted on the site. The proposed project consists of 24 residential units and is thus consistent with the land use and density designations.

While the project complies with the site’s density limits, the applicant is requesting waivers from the following development standards as part of the project’s required Design Review approval:

- **Height:** In the RM-32 district, on lots 60’-0” in width or greater, the maximum height of structures in the front 60% of the site is 24’-0” to the highest ridgeline. In the rear 40% of the site the maximum height of structures is 36’-0” to the highest ridgeline. The proposed rear buildings would exceed height limits and thus would require a waiver from this standard.
- **Height:** When multiple lots have been consolidated to form a single building site with a combined front street frontage of more than 160’-0”, the height limit shall be two stories over the entire site. The proposed rear buildings are greater than two stories and thus would require a waiver from this standard.
- **Setback:** Within the RM-32 zoning district, when 40 percent or more of the lots on a blockface in the same zoning district (excluding corner yards of reversed corner lots) are developed with primary structures, the minimum front yard setback shall be the average of the front yard setbacks of the developed lots, but not less than 20’-0”. This tabulation includes the setback of the existing building on the subject sites. Based on the project plans, the average front yard setback on the blockface is 29’11” and the proposed project is providing a 20’6” front yard setback, which does not comply with the minimum requirement and thus would require a waiver from this standard.
- **Main Garden Size:** The minimum main garden area required for the proposed project is 20% of the lot area. For the subject 35,824 square foot lot, a minimum of 7,765 square foot main garden area is required. The proposed main garden area is 6,927 square feet, which is 838 square feet smaller than the required size, and thus would require a waiver from this standard.
- **Main Garden Shape:** The main garden is required to be a rectangular shape and shall have a minimum dimension of 20’-0” in either direction. The proposed garden meets the minimum dimensions but is “L-shaped” and thus would require a waiver from this standard.
- **Total Garden Size:** The minimum total garden area required for the proposed project is 37% of the lot area. For the subject 35,824 square foot lot, a minimum of 14,365 square feet of total garden area is required. The proposed total garden area is 14,238 square feet, which is 127 square feet smaller than the required size, and thus would require a waiver from this standard.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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- **Parking Garage Tree Wells:** A main garden with a required area of 1,500 square feet or more shall have at least one canopy tree with a mature height of 35'-0" or more. When the main garden is over partially subterranean parking, for each canopy tree required, a tree with a mature height of 25'-0" shall extend down to natural soil through the parking structure in a tree well with a minimum inside diameter of 6'-0". An additional canopy tree of this size shall be included for each additional 1,000 square feet of required area. Minimum tree well size at planting shall be 15 gallons. For the required 7,165 square foot main garden a total of six canopy trees are required. The proposed parking garage does not include any tree wells and thus would require a waiver from this standard.

The requested waivers would not result in a conflict with the primary goals or objectives of the General Plan or Zoning Ordinance. For example, while the finished rooftop ridgeline elevation would exceed the proscribed height limit, it would be roughly the same as the existing Evanston Inn structure. Similarly, new construction elements along Marengo Avenue are smaller in scale than the Evanston Inn and are oriented to internal courtyards so that the Evanston Inn will maintain its historic prominence along the frontage.

New construction behind the Evanston Inn will be scaled to not be viewable from the sidewalk in front of the Evanston Inn. Garage access will be from the private Evanston Place and one existing curb cut/driveway will be removed along Marengo Avenue, creating a more cohesive frontage along Marengo Avenue. Open space along Marengo Avenue will also be landscaped to be evocative of historic landscaping shown in period photos.

Thus, while some waivers will be required as detailed above, the proposed project meets the main objectives of the land use plans and ordinances governing the project site and appropriately balances the requirements of the zoning code with the historic importance and associated development limitations of the project site. Moreover, as demonstrated throughout this Initial Study, the proposed project would not result in any unmitigated significant adverse environmental impacts or detract from the objectives of any plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental impact. Impacts would be less than significant.

- c. *Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?*

WHY? There are no adopted habitat conservation or natural community conservation plans in Pasadena. There are also no applicable approved local, regional, or state habitat conservation plans. As a result, no impacts would occur to any applicable habitat conservation plans or natural community conservation plans.

14. MINERAL RESOURCES. Would the project:

- a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

WHY? No active mining operations exist in Pasadena. There are two areas in the city that may contain mineral resources. These two areas are Eaton Wash, which was formerly mined for sand and gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate. The project is not located near these

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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areas. In addition, the project site is not located in an area known to contain mineral deposits. Neither the project site nor surrounding areas are utilized for mineral production. Implementation of the proposed project would not result in the loss of an available known mineral resource with value to the region. As such, no mineral resources impacts would occur.

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

WHY? The City's 2004 General Plan Land Use Element does not identify any mineral recovery sites in the city. Furthermore, there are no mineral resource recovery sites shown in the 1999 "Aggregate Resources in the Los Angeles Metropolitan Area" map published by the California Department of Conservation, Division of Mines and Geology. No active mining operations exist in Pasadena, and mining is not currently allowed under any of the City's designated land uses. Therefore, the proposed project would not result in the loss of a locally important mineral resource recovery site, and no impact would occur.

15. NOISE. Will the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

WHY? The proposed project is located in an urbanized area of the City. The primary noise source in the immediate vicinity of the project site is vehicle traffic on adjacent roadways. The proposed project would result in a temporary and intermittent increase in noise during construction. This increase is not considered unique or significant. Project construction is required to adhere to the City's noise ordinance that specifies allowable construction hours and restricts construction activities on Sundays and holidays. Operational, or long-term, noise sources would mainly consist of increased vehicle traffic associated with the project. However, as detailed in subsection 19, Transportation/Traffic, the proposed project is expected to contribute minimal traffic to neighboring roadways (approximately 45 trips per day). This incremental increase would result in no perceptible change in ambient roadway noise levels. Noise impacts associated with construction and operation of the proposed project would thus be less than significant.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

WHY? Construction of the proposed project would require the use of construction equipment during grading, excavation, hauling, and other construction activities. The use of this type of heavy equipment could generate groundborne vibration and noise in the immediate vicinity. However, there are no construction or operational aspects of the project typically associated with significant groundborne vibration or noise levels (e.g., blasting, pile driving), and impacts are thus considered less than significant.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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c. *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

WHY? See Issue a) above. A potentially significant impact would occur if the proposed project would cause a substantial permanent increase in noise levels above existing ambient levels. Vehicular traffic would be the primary source of noise during project operation. However, the addition of 45 total daily vehicle trips to surrounding roadways would not result in a perceptible increase in ambient noise levels. Impacts would thus be less than significant.

d. *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

WHY? As indicated above, the proposed project would generate short-term noise due to construction activities, thus raising ambient noise levels above existing levels. This increase is not considered unique or significant. Project construction is required to adhere to the City’s noise ordinance that specifies allowable construction hours and restricts construction activities on Sundays and holidays. Impacts would be less than significant.

e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

WHY? There are no airports located in the city. The project site is not located within an area subject to an airport land use plan. The closest airport is the Bob Hope Airport (formerly the Burbank-Glendale-Pasadena Airport), which is located 16 miles northwest of the project site in Burbank. Therefore, the proposed project would not expose people to excessive airport-related noise and would have no associated impacts.

f. *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

WHY? There are no private-use airports or airstrips in the vicinity of the project site. As such, no impacts would occur.

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16. POPULATION AND HOUSING. Would the project:

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

WHY? The proposed project involves urban infill construction of 24 residential units in an existing neighborhood. This type and scale of development would not result in substantial population growth, and is consistent with the City's General Plan build-out projections. In addition, development of the proposed project would not require extending or improving infrastructure in a manner that would facilitate off-site growth. Therefore, the proposed project would not induce substantial population growth and would have no related significant impacts.

- b. *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

WHY? The proposed project would restore dilapidated dwelling units in the historical Evanston Inn and increase the total number of dwelling units on the project site. Two single-family residences would be removed or relocated to accommodate the project; however, this would not constitute displacement of substantial numbers of housing, nor would it necessitate the construction of replacement housing elsewhere. Additionally, because the project proposes more than 10 units, the City's Inclusionary Housing Requirements apply. The requirements are intended to encourage the development and availability of affordable housing by ensuring that the addition of affordable housing units to the City's housing stock is in proportion to the overall increase in new residential unit. An Inclusionary Housing Plan for the proposed project will be submitted to the City's Housing Department for review and approval. Impacts would be less than significant.

- c. *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

WHY? No persons would be displaced as a result of the proposed project; thus, no impacts would occur.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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17. PUBLIC SERVICES. Will the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a. Fire protection?

WHY? The project site is located in an urbanized area and is considered a low fire hazard area according to the City's General Plan Safety Element. The nearest fire station to the project site is Station 31, located approximately one-half mile from the project site at 135 South Fair Oaks Avenue. Although the proposed project would increase the intensity of uses on the site compared to the existing condition, the proposed project would not substantially induce population, either directly or indirectly, and can be served by existing personnel and equipment. Further, the proposed project is required to incorporate safety and security features, including fire sprinklers, alarm systems, and adequate access for emergency vehicles. Therefore, the proposed project would not significantly impact fire protection services; impacts would be less than significant.

b. Libraries?

WHY? The project is located approximately one-half mile from the nearest branch library. The city as a whole is well served by its Public Information (library) System, and the project would not significantly impact library services. The proposed project would not induce substantial population growth that could place a significant burden on Pasadena's library system. Impacts would be less than significant.

c. Parks?

WHY? The project is located approximately 0.3 miles from the nearest park, Central Park. According to the City's park impact fee nexus study prepared in 2004, for every 1,000 residents, the city as a whole has 2.17 acres of developed parkland and 1.49 acres of open space parkland, for a total of 3.66 acres of park and open space per 1,000 residents. The City collects park impact fees for residential and nonresidential projects (Ordinance No. 6252) and uses the funds for park maintenance and improvement programs.

Since the proposed project involves the construction of 24 residential units within walking distance to Central Park, there is potential for an increase in usage of park space. However, with the payment of park impact fees, the proposed project would not lead to substantial population growth warranting the construction of additional park space or physical deterioration of any recreational facilities. Thus, impacts would be less than significant.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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d. *Police protection?*

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WHY? The proposed project would be served by the Pasadena Police Department. The nearest police station to the project site is located at 207 North Garfield Avenue, approximately 0.8 miles northeast of the site. The Pasadena Police Department would review project plans prior to issuance of a building permit to ensure consistency with applicable police-related design standards. The proposed 24 residential units do not present any unique features or operational aspects that could reasonably be expected to result in an increased need for police protection. Impacts would be less than significant.

e. *Schools?*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? The proposed project involves the construction of 24 residential units, which could result in the addition of approximately nine school-aged children who would attend schools in the Pasadena Unified School District (assuming a conservative generation rate of 0.35 school-aged children per unit). The City collects a school district construction tax on all new construction, residential and nonresidential. Payment of school impact fees has been deemed full mitigation for project impacts to schools by the state legislature. Thus, the proposed project would result in a less than significant impact to schools.

f. *Other public facilities?*

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WHY? The project's development may result in additional maintenance of public facilities. However, the proposed project is consistent with the growth anticipated and accommodated by the City's General Plan and would not induce substantial population growth. With the projected revenue to the City in terms of impact fees, increased property taxes, additional sales tax, and development fees associated with the project, impacts would be less than significant.

18. RECREATION.

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

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WHY? The project is located approximately 0.3 miles from the nearest park, Central Park. According to the City's park impact fee nexus study prepared in 2004, for every 1,000 residents the city as a whole has 2.17 acres of developed parkland and 1.49 acres of open space parkland, for a total of 3.66 acres of park and open space per 1,000 residents. The City collects park impact fees for residential and nonresidential projects (Ordinance No. 6252) and uses the funds for park maintenance and improvement programs.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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Since the proposed project involves the construction of 24 residential units within walking distance to Central Park, there is the potential for an increase in usage of park space. However, with the payment of park impact fees, the proposed project would not lead to substantial population growth warranting the construction of additional park space nor physical deterioration of any recreational facilities. Thus, impacts would be less than significant.

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

WHY? The proposed project would not include recreational facilities and would not require the construction or expansion of recreational facilities. Therefore, the proposed project does not involve the development of recreational facilities that would have an adverse effect on the environment. No impacts would occur.

19. TRANSPORTATION/TRAFFIC. Would the project:

a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

WHY? Pasadena currently evaluates the performance of the circulation system using conventional standards such as intersection volume-to-capacity (V/C) ratio, level of service (LOS), and street segment volumes. A traffic study was prepared for the project in July 2013 by Linscott Law and Greenspan Engineers (see Appendix D). The traffic study concluded that the proposed project would not result in significant traffic impacts. The proposed project is estimated to generate 45 net daily trips per day with 3 trips in the AM peak hour and 3 trips in the PM peak hour. The additional daily vehicle trips would increase traffic volumes on South Marengo Avenue and Bellevue Drive by 0.2 percent and 0.1 percent, respectively. These increases would not affect the existing V/C ratio or LOS of the surrounding street network.

The City of Pasadena Department of Transportation reviewed the project traffic study and noted the following recommendations and conditions for project approval:

1. The project must pay a Traffic Reduction and Transportation Improvement Fee based on the number of residential units (with affordable units waived and credit given to existing units removed).
2. A circulation plan for the parking garage must be reviewed and approved by the department.
3. No vehicles will be allowed to remain standing in any street or alley between the hours of 2 AM and 6 AM per Pasadena Municipal Code 10.44.010.
4. The project must provide vehicle and bicycle parking spaces per code.
5. Existing on-street parking conditions fronting the project should be maintained.

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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Based on the findings of the traffic study and the department's review and recommendations to which the project must adhere, the proposed project would result in a less than significant impact.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

WHY? The Congestion Management Program (CMP) is a State-mandated program designed to address the impact of local growth on the regional transportation system. Metro is the agency responsible for implementing the CMP for Los Angeles County. The CMP guidelines specify that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated CMP roadway intersections where a project could add 50 or more trips during either peak hour. The proposed project is estimated to generate 3 trips in the peak hour. Thus, a CMP analysis is not required and the proposed project would not conflict with the CMP. This impact would be less than significant.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

WHY? The project site is not in an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, the proposed project would not affect any airport facilities and would not cause a change in the directional patterns of aircraft. No impacts would occur.

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

WHY? A potentially significant impact would occur if the project substantially increases an existing hazardous design feature or introduces incompatible uses to the existing traffic pattern. The proposed project would not create any safety hazards from project design features and would not introduce incompatible uses. All ingress and egress to the project site would be provided in compliance with the specifications of the City's Public Works and Transportation departments to ensure that adequate visibility and safety distance are provided at these access points. No changes to existing street configurations would occur either. Consequently, the proposed project would have no impact related to design hazards.

e. Result in inadequate emergency access?

WHY? A potentially significant impact would occur if the project resulted in inadequate emergency access. Site ingress and egress would comply with all Building, Fire, and Safety Codes, with final plans subject to review

Potentially Significant Impact	Significant Unless Mitigation Is Incorporated	Less Than Significant Impact	No Impact
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and approval by the City’s Public Works and Transportation departments, the Building Division, and the Fire Department. No permanent lane closures or obstructions that could impede emergency response to or from the project site from surrounding streets would occur as a result of the proposed project. Consequently, the proposed project would have a no impact related to emergency access.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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WHY? In compliance with CMP standards, the proposed project would be required to implement a Transportation Demand Management Plan, which accommodates facilities for alternative transportation. Objective 3.2.2 of the City’s General Plan Mobility Element is to “encourage non-auto travel.” The proposed project is conducive to non-auto travel, as it is located within walking distance to several bus routes and the Metro Gold Line. Additionally, the traffic study conducted for the proposed project (LLG 2013) concluded that bicycle and pedestrian conditions in the project vicinity are of “average quality” whereby pedestrian and bicycle conditions exist, but there is room for improvement. The proposed project would not conflict with any policies, plans, or programs promoting non-auto transportation. No impacts would occur.

20. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? The proposed project would generate approximately 4,560 gallons per day of wastewater in the form of domestic sewage (Los Angeles County Sanitation Districts 2004). Individual projects are subject to a Los Angeles County Sanitation Districts sewer connection fee when connected to a sewer line. Pasadena is in Los Angeles County Sanitation District 16. All sewage from the project site would be conveyed to existing sewer lines and facilities. Wastewater discharge would be regulated by applicable standards and requirements that are imposed and enforced by the City’s Department of Public Works, Engineering Division. All wastewater would be treated in compliance with the requirements of the LARWQCB. Therefore, the proposed project would not exceed wastewater treatment requirements of the LARWQCB, and impacts would be less than significant.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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WHY? The City’s Department of Public Works, Engineering Division, maintains the local sewer system. Flows from the local system are currently carried to the trunk sewers operated by the Los Angeles County Sanitation Districts. As noted above, the proposed project would generate approximately 4,560 gallons of wastewater per day, while the proposed project would use approximately 6,000 gallons of water per day. There are no existing deficiencies in the City’s collection system or the County Sanitation Districts’ collection and treatment facilities serving Pasadena. Wastewater is currently treated at the Whittier Narrows Reclamation Plant, San Jose Creek Water Reclamation Plant, and Los Coyotes Water Reclamation Plant. Because Los Angeles County Sanitation

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District 16 treats the City's wastewater, the proposed project would be subject to a sewer connection fee when the project is connected to a sewer line. Connection of the main sewer lines would occur during construction and would not result in environmental impacts beyond those analyzed in this Initial Study.

In conformance with the California Green Building Program, the City has adopted an amended California Green Building Standards Code (PMC 14.04.500) for all new construction and tenant improvements. Additionally, the proposed project would be subject to the Water Waste Prohibitions and Water Supply Shortage Plans Ordinance (PMC Chapter 13.10), which imposes mandatory water conservation measures during Level 1 (least restrictive) through Level 4 (most restrictive) water supply shortages, the Water Efficient Landscape Ordinance (PMC Chapter 13.22), and the Landscaping Ordinance (PMC Chapter 17.44) to further reduce water demand and any corresponding requirement for new water facilities.

No deficiencies have been identified for the water mains and treatment facilities that currently serve the project area. In addition, as a priority project for the City's water system identified in the current Capital Improvement Program, new and replacement water distribution mains would be installed at various locations throughout the city, which would be funded, in part, by development fees (City of Pasadena 2011a). The proposed project would also be required to pay fees to connect to the existing water mains available to serve the site.

Overall, because existing wastewater and water facilities are available to serve the proposed project and no new wastewater or water treatment facilities or expansion of existing facilities would be required, impacts would be less than significant.

- c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

WHY? The proposed project would not require the construction of new stormwater drainage facilities or the expansion of existing facilities. The project site is located in a developed urban area where storm drainage is provided by existing streets, storm drains, flood control channels, and catch basins. As discussed in subsection 12, Hydrology and Water Quality, the project would involve only minor changes in the site's drainage patterns and does not involve altering any drainage courses or flood control channels. The project applicant would be required to submit and implement an on-site drainage plan that meets the approval of the City's Building Official and Public Works Department. Therefore, the proposed project would not require or result in any stormwater drainage improvements, and impacts would be less than significant.

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

WHY? As indicated above, the proposed project would generate demand for approximately 6,000 gallons of water per day. Implementation of the proposed project would not demand an amount of water equivalent to or

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greater than a 500-dwelling-unit project and would therefore not trigger the requirement for the preparation of a water supply assessment as described in Sections 10910–10912 of the California Water Code.⁴

Over the past several years, the PWP has been impacted by several factors that have restricted local and regional water supply. The PWP’s groundwater rights in the Raymond Basin have been curtailed in order to mitigate groundwater depletion experienced over the last half century. With respect to imported supplies, a decade-long drought has reduced the ability to replenish regional groundwater supplies; drought conditions in the American Southwest have reduced deliveries of water from the Colorado River, and legal and environmental issues have resulted in reduced water deliveries through the State Water Project. The City accounted for these conditions in its current Water Integrated Resources Plan (2011) and Urban Water Management Plan (2011). As of April 2011, the Metropolitan Water District has lifted allocation restrictions as a result of improvements in Southern California’s water reserves.

Pasadena Municipal Code Chapter 13.10 establishes 13 permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements, such as the 20X2020 Plan and the current work being done by the California Department of Water Resources, the SWRCB, and other state agencies, implement the State’s 20X2020 Water Conservation Initiative Program.

The current project must comply with the City’s Comprehensive Water Conservation Plan and PMC Chapter 13.10, which implement the City’s water conservation and supply shortage program intended to reduce water consumption within the city and its service territory through conservation, enable effective water supply planning, and ensure reasonable and beneficial use of water to avoid and minimize the effect and hardship of water shortage to the greatest possible extent. Per this requirement, the applicant will be required to demonstrate that the project will be able to reduce water consumption by a minimum of 10 percent. With submission of this plan, the proposed project would not have any individual or cumulative significant impacts on water supply. This plan would be subject to review and approval by the City’s Water and Power Department (i.e., PWP) and the Building Division prior to the issuance of a building permit. The proposed project’s irrigation and plumbing plans would also be required to comply with the approved water conservation plan and the City’s requirements for landscape irrigation.

Therefore, with compliance with existing City requirements, impacts on water supplies would be less than significant.

- e. *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?*

WHY? As discussed in Issue b) above, the proposed project is expected to generate approximately 4,560 gallons of wastewater per day. This estimated increase to wastewater service demand is negligible in comparison to the existing service area of the wastewater service purveyor. Wastewater from the city is currently treated by the County Sanitation Districts’ Whittier Narrows Reclamation Plant, San Jose Creek Water Reclamation Plant, and Los Coyotes Water Reclamation Plant. No deficiencies have been identified in these wastewater treatment facilities. Furthermore, the proposed project would be subject to the County

⁴ Based on the factors presented in the Department of Water Resources’ Guidebook for Implementation of SB 610 and SB 221 of 0.3 to 0.5 acre-feet per unit per year, the water demand associated with 500 dwelling units would range from approximately 134,267 to 223,767 gallons per day.

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Sanitation Districts' sewer connection fee when the project is connected to a sewer line. The proposed project will also be subject to a Sewer Facility Fee Charge as specified under PMC 4.53. Impacts related to the wastewater treatment capacity of the wastewater treatment plants that serve the project site would be less than significant.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

WHY? A potentially significant impact would occur if the proposed project's solid waste generation exceeded the capacity of permitted landfills. The proposed project would generate approximately 96 pounds of solid waste per day (City of Los Angeles 1961). Solid waste would be collected by a private hauler and transported primarily to the Scholl Canyon Landfill, which is permitted until 2025. The Scholl Canyon Landfill has a maximum daily capacity of 3,400 tons and a total remaining capacity of 5.66 million tons (CalRecycle 2008). Because there is adequate remaining capacity to accommodate the amount of solid waste generated by the proposed project, the proposed project's impacts to landfill capacity would be less than significant.

The proposed project would be subject to Chapter 8.62 of the Pasadena Municipal Code, which is the construction demolition and waste management ordinance. Pursuant to this ordinance, the proposed project would be required to divert a minimum of 50 percent of the construction and demolition debris from the project. Additionally, the proposed project would be required to meet the standards of California Green Building Standards Code. Proposed project impacts related to solid waste generation would be less than significant.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

WHY? In 1992, the City adopted the Source Reduction and Recycling Element to comply with the California Integrated Waste Management Act. This act requires that jurisdictions maintain a 50 percent or better diversion rate for solid waste. The City implements this requirement through Section 8.61 of the Pasadena Municipal Code, which establishes the City's solid waste collection franchise system. As described in PMC Section 8.61.175, each franchisee is responsible for meeting the minimum recycling diversion rate of 50 percent on both a monthly basis and an annual basis. The proposed project is required to comply with the applicable solid waste franchise's recycling system and thus will meet Pasadena's and California's solid waste diversion regulations. The project must comply with the City's Construction and Demolition Ordinance (PMC Section 8.62), which includes preparation of a Construction Waste Management Plan for new structures over 1,000 square feet. In addition, the project is required to comply with design requirements for refuse storage areas (PMC Section 17.40.120). Therefore, the proposed project would result in less than significant impacts related to federal, state, and local solid waste statutes and regulations.

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21. EARLIER ANALYSIS

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

No program EIR, tiering, or other process was used for analysis of the proposed project's environmental effects contained herein.

22. MANDATORY FINDINGS OF SIGNIFICANCE.

- a. *Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

WHY? As discussed previously, the proposed project would not result in any potentially significant impacts. As discussed in Section 6, Biological Resources, the proposed project would have no impacts to special-status species, stream habitat, or wildlife dispersal and migration. Furthermore, the proposed project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. Similarly, as discussed in Section 7, Cultural Resources, after mitigation the proposed project would result in less than significant impacts to the Evanston Inn historical resource, archaeological resources, and paleontological resources.

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

WHY? A significant impact may occur if the project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. When considering the proposed project in combination with other past, present, and reasonably foreseeable future projects in the vicinity of the project site, the proposed project does not have the potential to cause impacts that are cumulatively considerable. As detailed in the above discussions, the proposed project would not result in any significant and unmitigable impacts in any environmental categories. In all cases, the impacts associated with the project are limited to the project site or are of such a negligible degree that they would not result in a significant contribution to any cumulative impacts.

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

WHY? As detailed above, implementation of the proposed project does not have the potential to result in direct or indirect substantial adverse effects to human beings. The proposed project does not approach or exceed any significance thresholds for environmental issues typically associated with indirect or direct effects to people, such as hazardous materials handling, air, water, or land pollution, or adverse effects to emergency service response.

List of Preparers

City of Pasadena

Mark Odell – Senior Planner

Leon White – Principal Planner

John Bellas – Environmental Coordinator

Pacific Municipal Consultants

Bob Stark, AICP – Project Manager

Yvette Noir – Planner

Seth Myers – Planner

Suzanne Wirth – Editor

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