Draft Program Environmental Impact Report

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs City of South Pasadena

Prepared for

City of South Pasadena
Community Development Department
1414 Mission Street
South Pasadena, California 91030

Prepared by

Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101

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INTRODUCTION

The California Environmental Quality Act (CEQA) (Section 21000 et. seq. of the *California Public Resources Code*) requires that lead agencies consider the potential environmental consequences of projects over which they have discretionary approval authority prior to taking approval action on such projects. A Program Environmental Impact Report (PEIR) is a public document designed to provide the City, trustee and responsible agencies, the general public, and other interested parties with an analysis of potential environmental consequences of a project and to support informed decision making by the lead agency. The City of South Pasadena (City) is the Lead Agency under CEQA and is responsible for preparing the PEIR. This determination is made in accordance with Sections 15051 and 15367 of the State CEQA Guidelines, which define the Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project.

This PEIR has been prepared to identify, analyze, and mitigate, to the extent feasible, the potential environmental effects associated with implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project). This PEIR has been prepared pursuant to the requirements of CEQA and the Guidelines for the Implementation of CEQA (State CEQA Guidelines) (Title 14, *California Code of Regulations,* Chapter 3, Sections 15000 et. seq.).

This Executive Summary has been prepared in accordance with Section 15123(b) of the State CEQA Guidelines, which states that an EIR should contain a brief summary of the proposed actions and its consequences and should identify (1) each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) areas of controversy known to the Lead Agency; and (3) issues to be resolved, including the choice among alternatives and how to mitigate significant effects.

PROJECT LOCATION AND SETTING

The City of South Pasadena is located on the western edge of the San Gabriel Valley area of Los Angeles County (County), approximately 5 miles northeast of downtown Los Angeles. The City is surrounded by several municipalities, including the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and the City of Los Angeles neighborhoods, including Garvanza and Highland Park, to the west. The planning area for the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs includes approximately 3.5 square miles, or 2,272 acres, within the incorporated City limits. The City's estimated 11,156 residential dwelling units (DUs), housing the City's population of 25,580, are comprised of nearly equal number of single-family and multi-family units.

The City's land use pattern is well established and largely built out, with limited available vacant or underutilized land throughout the City. The City's development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses generally located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road. The City's circulation network is largely a grid system of north/south and east/west roads. The exception to the grid system is the southwest quadrant of the City that has curvilinear streets developed to fit the topography of the area.

Regional access to the City is provided predominantly by State Route 110 (SR-110, Arroyo Seco Parkway), which transects the City. Interstate 210 (I-210) and SR-134 also provide regional access, with the nearest ramps situated approximately 1 mile north of the northern City boundary. The Los Angeles County Metropolitan Transportation Authority (Metro) A Line also provides transit/rail access to downtown Los Angeles, City of Pasadena, and the northern San Gabriel Valley.

PROJECT BACKGROUND AND CONTEXT

The City was the subject of a Court Order[1] to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. In April 2022, a lawsuit was filed alleging that the City was in violation of State Planning Law because the City had not adopted a 6th Cycle Housing Element by the State's statutory deadline of October 15, 2021. In August 2022, a Court Order was entered on the lawsuit requiring certain actions by the City within certain time period to bring the Housing Element into compliance with Section 65754 of the Government Code. As part of this Court Order, environmental documentation pursuant to Government Code Section 65759(a) et. seq. (which is separate from the CEQA process) was prepared and consisted of an Initial Study and Environmental Assessment (EA). Such action to comply with the Court Order by approving the Housing Element must be completed within the May 31, 2023, deadline timeframe stated within the Court Order. On May 16, 2023, the City received a letter from the California Department of Housing and Community Development (HCD) stating that the revised Housing Element (dated May 5) was found to be compliant with State housing law. On March 17, 2023, the Planning Commission considered the Housing Element, Initial Study, and EA, among other documentation, and adopted a resolution recommending the City Council adopt the EA and approve the Housing Element. On May 30, 2023, City Council adopted the EA and approved the 2021–2029 Housing Element.

While the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs.

PROJECT DESCRIPTION

Pursuant to State law, the City of South Pasadena has an approved General Plan. The *South Pasadena General Plan* was last updated and adopted by the City in 1998. Similarly, the City has an approved Specific Plan for a portion of the downtown area. The Mission Street Specific Plan (MSSP; now expanded to include a segment of Fair Oaks Avenue and referred to as the Downtown Specific Plan) was adopted in 1996. State law does not require a General Plan to be updated in regularly scheduled intervals, except for the Housing Element, which must be updated every five to eight years. However, a general plan needs to be updated if it is to reflect community values and priorities as they change over time.

Accordingly, the comprehensive General Plan and DTSP Update is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live; reflect an understanding of current community goals; address

[1] Stipulated Judgment (*Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*).

continued growth pressures in the San Gabriel Valley and the demand for more diverse mobility and housing choices; and respond to evolving regional and environmental issues.

The General Plan and DTSP Update each include eight chapters, and each of the chapters features an overriding goal with policies and actions that support the goal. The nine chapters are: Our Natural Community; Our Prosperous Community; Our Well Planned Community; Our Accessible Community; Our Resilient Community; Our Healthy Community; Our Safe Community; Our Active Community; and Our Creative Community. These nine chapters and their content (i.e., goal, policies, actions), reflect the public visioning process. Policies and actions that support each goal also provide guidance for the City's ongoing operations, daily actions, decision-making activities, maintenance activities, regulation enforcement, monitoring, services provision, and other governmental activities.

The Housing Element is one of the State-mandated elements of a General Plan. It identifies the City's housing conditions, needs, and opportunities and establishes the goals, policies, and actions (programs) that are the foundation of the City's housing strategy. However, unlike all other General Plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). The City's 2013–2021 Housing Element was in effect through 2021. Housing needs are determined by HCD, which allocates numerical housing targets to the Metropolitan Planning Organizations (MPOs), including the Southern California Association of Governments (SCAG), which includes the City. SCAG finalized its Regional Housing Needs Assessment (RHNA), on March 9, 2021, and has allocated 2,067 DUs to the City of South Pasadena. Additionally, the California Department of Housing and Community Development (HCD) has recommended the 2021–2029 Housing Element to demonstrate capacity for a surplus of 708 units beyond the RHNA allocation. As discussed in Section 2.0. Environmental Setting and Project Description, the Court Order requires the City to seek repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DU/acre).

Based on research, community input, State requirements, and HCD feedback, the central strategy of the 2021-2029 Housing Element Implementation Programs preserve existing housing stock and directs calibrated growth to identified growth areas while providing housing opportunities for all. The Housing Element Implementation Programs update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation and recommended surplus with the general pattern of the existing land use plan.

The General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project would accommodate a total of 2,775 residential DUs (including the HCD-recommended surplus units) and 430,000 square feet (sf) of non-residential uses, comprised of retail and office development, in addition to both the existing land uses (see Table 2-2 in Section 2.0 of this PEIR). The full buildout of the Project, for purposes of this PEIR, would generate up to an additional 6,882 residents (assuming no residential vacancies) and additional 1,978 jobs in the City through 2040, compared to existing conditions.

It is important to note that the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. New development would continue to be subject to the City's development review process. The General Plan and DTSP Update serve as a long-term policy guide for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City. The proposed 2021–2029 Housing Element

Implementation Programs serve as the policy guide for decision-making regarding residential development and demonstrates how the City intends to comply with State housing legislation and regional (i.e., SCAG) requirements.

PROJECT ALTERNATIVES

Section 15126.6 of the State CEQA Guidelines requires an evaluation of the comparative effects of a reasonable range of alternatives to the proposed Project that would feasibly attain most of the proposed Project objectives and would avoid or substantially lessen any of the significant impacts of the proposed Project. A feasible alternative is one that can be accomplished successfully in a reasonable period of time, taking economic, legal, social, and technological factors into consideration. The range of alternatives is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasonable choice.

In accordance with Section 15126.6 of the State CEQA Guidelines, Section 4.0, Alternatives, of this PEIR addresses alternatives to the proposed Project. Section 4.0 provides a description of each alternative; a comparative analysis of the potential environmental effects of each alternative to those associated with the proposed Project; a discussion of each alternative's ability to meet the Project objectives; and a discussion of the environmentally superior alternative. The following is a summary description of the alternatives evaluated in this PEIR:

- **Alternative 1 – No Project/Existing General Plan.** This alternative addresses one of the two types of "No Project" alternatives identified by CEQA: the No Project/Existing General Plan Alternative, which assumes the 1998 General Plan and 2014–2021 Housing Element would remain as the adopted long-range planning policy document for the City of South Pasadena, with future development occurring pursuant to the City's current General Plan goals and policies and Land Use Map. Buildout under this alternative is estimated at 265 DUs and 66,124 sf of non-residential (i.e., commercial/office) development in the City over the next approximately 20 years (through 2040).
- **Alternative 2 – Reduced Development Capacity.** This alternative addresses buildout of the anticipated development capacity of the General Plan and DTSP Update prior to the inclusion of the proposed 2021–2029 Housing Element Implementation Plans. Buildout under this alternative assumes up to 589 DUs and 430,000 sf of non-residential (i.e., commercial/office) development in the City over the next approximately 20 years (through 2040).

ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State CEQA Guidelines requires that an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With respect to the proposed Project, the key issues to be resolved include decisions by the City of South Pasadena, as Lead Agency, pertaining to:

- Whether this environmental document adequately describes the potential environmental impacts of the proposed Project;
- Whether the recommended mitigation measures and the design of the Project should be modified and/or adopted as proposed;
- Whether the Project benefits override those environmental impacts that cannot be feasibly avoided or mitigated to a less than significant level;

- Whether there are other mitigation measures that should be applied to the Project besides those identified in the Program EIR; and
- Whether there are any alternatives to the proposed Project that would substantially lessen any of its significant impacts while achieving most of the basic Project objectives.

AREAS OF CONTROVERSY

Section 15123(b)(2) of the State CEQA Guidelines indicates that an EIR summary should identify areas of controversy known to the Lead Agency, including issues raised by the public agencies and the public. This PEIR has taken into consideration the written comments received from the public and various agencies in response to both the Notice of Preparation (NOP) distributed in January 2018 and the Recirculated NOP (RNOP) distributed in April 2021, and comments received during the public scoping meeting held on February 5, 2018, and virtual scoping meeting held on May 3, 2021, via Zoom. A copy of the NOP and RNOP and comments received are provided in Appendix A-1 and A-2, respectively, of this PEIR. A summary of issues raised in response to the 2018 NOP and 2021 RNOP, and where in the PEIR they are discussed, is presented in Tables 1-1 and 1-2 in Section 1.0, Introduction, of this PEIR. Although two NOPs were distributed for this PEIR, it is noted that the baseline for environmental analysis is April 2021 unless otherwise identified.

The primary environmental areas of controversy that have been raised to date related to implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project, based on responses to the 2018 NOP and 2021 RNOP, are: traffic, parking, water supply, and water and wastewater infrastructure.

SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS

Pursuant to Sections 15126.2 and 15126.4 of the State CEQA Guidelines, a Draft EIR is required to identify any potentially significant adverse impacts and recommend mitigation measures that would eliminate or reduce these impacts to levels of less than significant. At the onset of the CEQA process, the City determined that an EIR is required for the proposed Project and, as allowed by CEQA, did not prepare an Initial Study (refer to State CEQA Guidelines Sections 15060 and 15081). It was determined that, with the exception of agricultural resources (farmland), forestry resources, and mineral resources, which do not exist in the City, implementation of the proposed Project could have potentially significant impacts for each of the remaining topical environmental issues identified in the environmental checklist, included in Appendix G to the State CEQA Guidelines. The scope of the PEIR was further determined based upon comments received in response to the NOP and comments received at the public scoping meeting held by the City. This PEIR analyzes the following environmental topics:

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

If the City of South Pasadena, as Lead Agency, determines that unavoidable significant adverse impacts would result from the proposed Project, a Statement of Overriding Considerations must be prepared and adopted before it can approve the proposed Project. A Statement of Overriding Considerations states that the decision-making body has weighed the physical, social, and economic benefits of the Project against its unavoidable significant environmental effects and has determined that the benefits of the Project outweigh its adverse effects; therefore, the adverse effects are considered acceptable. Based on the analysis presented in the PEIR, implementation of the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project would result in the following significant and unavoidable impacts after implementation of feasible mitigation measures:

- Aesthetics (Visual Character at a program and cumulative level);
- Air Quality (Air Quality Management Plan Consistency, Regional Construction and Operational Emissions Standards Violation, and Cumulative Emissions at a program and cumulative level; Local Construction Emissions Standards Violation at a program level);
- Cultural Resources (Historic Resources at a program and cumulative level);
- Greenhouse Gas Emissions (GHG Emissions at a cumulative level);
- Noise (Construction and Exterior Traffic Noise Standards Violation at a program and cumulative level); and
- Population and Housing (Population Growth at a program and cumulative level).

Table ES-1 presents a summary of significant environmental impacts identified in Sections 3.1 through 3.16 of this PEIR; Mitigation Measures (MMs) that reduce any significant impacts; and the level of significance of each impact after mitigation. Significant irreversible environmental changes and growth-inducing impacts are addressed in Section 5.0, Other CEQA Considerations. Regarding irreversible change, potential future development associated with the Project would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses through the year 2040. However, the use of such resources is anticipated and accounted for in the State, regional, and local regulations, which generally prohibit wasteful practices and require environmentally conservative actions, as summarized in the “Relevant Programs and Regulations” discussion within Sections 3.1 through 3.16 of this PEIR. Similarly, as discussed in Section 3.9, Land Use and Planning, the proposed Project is entirely consistent with the goals adopted in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, which is intended to reduce VMT, contribute to improved air quality, and greenhouse gas emissions, among other objectives. Therefore, although irreversible changes would result from implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, such changes would not be considered significant, and no mitigation is required.

Regarding growth-inducing impacts, implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project, which is, by definition, growth-inducing regardless of the significance finding for the Project in Section 3.12, would result in significant environmental impacts after mitigation, as presented in Sections 3.1 through 3.16 of this PEIR. This is considered a significant and unavoidable growth-inducing impact.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 3.2 – Air Quality		
Because the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs identify future land uses and do not contain specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Therefore, regional and local criteria pollutant emissions for construction activity have not been quantified, it is conservatively assumed that construction-related emissions of future development projects would result in significant and unavoidable impacts.	There are no feasible mitigation measures to reduce this potential impact at the programmatic level of analysis provided in this PEIR. There is no project to modify with mitigation to reduce or avoid criteria pollutant emissions. The Applicant/Developer of any future Project requiring environmental evaluation pursuant to CEQA would be required to conduct project-specific air quality analyses that include mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible and consistent with all requirements of CEQA and the State CEQA Guidelines. In addition, for projects that are estimated to exceed the SCAQMD construction emissions significance thresholds, all feasible mitigation measures shall be applied to minimize construction-related air quality impacts, based on project-specific air quality modeling, to the maximum extent practically and technologically feasible.	Significant and unavoidable at a program and cumulative level
Operational activities associated with the Project (area sources, energy sources, mobile sources, and stationary sources) would result in criteria air pollutant emissions. Estimated operational emissions from buildout of the Project are estimated to exceed the SCAQMD thresholds for VOCs.	There are no feasible mitigation measures to reduce this potential impact at the programmatic level of analysis provided in this PEIR.	Significant and unavoidable at a program and cumulative level
The Project has the potential to conflict with the applicable 2022 AQMP because: 1) air emissions associated with buildout of the Project could create and increase in the severity of air quality violations within the air basin; and 2) buildout of the Project would exceed the 2020–2045 RTP/SCS demographic projections and consequently air emissions that are included in the 2022 AQMP.	There are no feasible mitigation measures to reduce or avoid the impact related to the inconsistency with the 2020–2045 RTP/SCS.	Significant and unavoidable at a program and cumulative level

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SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
Potential residential units that would be proposed in the areas of the City located near State Route 110. The California Air Resources Board recommends site-specific evaluation prior to siting any sensitive land use near a source of TACs. Although not required under CEQA, the City will require a site-specific health risk evaluation be conducted for future projects meeting certain criteria, as presented in MM AQ-1.	**MM AQ-1** The Applicant/Developer for residential land use projects in the City within 500 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 100,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall conduct and submit a health risk assessment (HRA) to the City of South Pasadena Community Development Department. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM10 concentrations exceed 2.5 µg/m3, PM2.5 concentrations exceed 2.5 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the Applicant/Developer shall be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms, prior to issuance of a grading permit. Measures to reduce risk may include but are not limited to: • Air intakes located away from high volume roadways and/or truck loading zones. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 12 or better). If the HRA cannot demonstrate that the acceptable risk level can be achieved, then no residential land uses may be developed within 500 feet of the TAC source.	Less than significant at a program and cumulative level
Section 3.3 – Biological Resources		
Cooper's hawk and western mastiff bat are special status wildlife species with potential to occur in the large trees that are located throughout the City. Removal, trimming, or other disturbance of occupied trees may result in loss or harm to individuals of these species and may negatively affect the local population.	**MM BIO-1** A qualified biologist shall conduct nesting bird surveys in areas with potentially suitable habitat prior to any construction or site preparation activities that would occur during the nesting and breeding season of native bird species (typically March 1 through August 15). The survey area shall include all potential bird nesting areas within 200 feet of any disturbance. The survey shall be conducted no more than three days prior to commencement of activities (i.e., grubbing or grading).	Less than significant at a program and cumulative level

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	If active nests of bird species protected by the MBTA and/or the California Fish and Game Code (which, together, apply to all native nesting bird species) are present in the impact area or within 200 feet of the impact area, a temporary buffer shall be placed a minimum of 200 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and type of disturbance, as determined by the biologist and/or applicable regulatory agency permits. Clearing and/or construction within the buffer shall be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The biologist shall serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. **MM BIO-2** Trimming or removal activities of mature or significant trees will be conducted between August 16 and February 28, outside of the breeding season for native bird and bat species. If activities trimming or removal activities must be conducted during the breeding season, a qualified biologist shall survey the tree to be impacted to assess the presence or absence of any active bird nest or bat maternity roost. If either are determined to be present, trimming or removal activities will be postponed until after the breeding season has concluded, or until otherwise deemed acceptable by the qualified biologist due to a discontinuation of nesting bird activity or bat roost vacancy.	
The General Plan Update encourages the use of fire resistant landscaping in hillside areas, which would include some properties adjacent to undeveloped or vacant open space areas that have potential to support various special status plant and wildlife species.	**MM BIO-3** Within six months of the adoption of the General Plan and Downtown Specific Plan Update, the City shall develop a list of fire-resistant plant species that excludes exotic plant species with a high or moderate rating on the California Invasive Plant Council's invasive plant inventory. This fire-resistant plant list shall be the basis of any requirements or recommendations to residents, businesses, and/or developers of future projects in hillside areas that require fire-resistant construction and landscaping.	Less than significant at a program and cumulative level
The undeveloped and vacant open space areas supporting stands of native vegetation have potential to support various special status plant	**MM BIO-4** If the disturbance limits of any future development project are within 500 feet of native vegetation located in the Arroyo Seco drainage corridor, the Applicant/Developer shall have a biological assessment conducted. A biological	Less than significant at a program and cumulative level

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
and wildlife species. Although future development would be focused away from these areas, there may be direct impacts of projects and indirect impacts of activities occurring adjacent to these areas.	assessment shall also be conducted for all future development on or immediately adjacent to vacant, naturally vegetated parcels. All assessments shall be conducted by a qualified biologist and shall identify all potential sensitive biological resources and provide recommendations for focused surveys (if warranted) and/or avoidance or minimization conditions for project implementation. The assessment shall be reviewed and approved by the City prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all recommendations of the biological assessment such that project-level impacts are not expected to reduce regional populations of plant and wildlife species to below self-sustaining levels.	
The Project would mostly direct future development to areas of existing development, limiting development of naturally-occurring drainage features. However, cement-lined drainage features that are jurisdictional under the Clean Water Act are dispersed across the City and impacts to those features may occur because of future development.	**MM BIO-5** If project construction activities of any future development project have the potential to impact (e.g., dredge and fill, demolition, dewatering or other discharge) a channel/drainage that conveys water during rainfall events, at a minimum, or as recommended by the qualified biologist conducting an assessment per MM BIO-4 above (if also applicable), shall conduct a jurisdictional delineation to determine if impacted channel/drainage meets definition of State and federal regulations. If the delineation report, prepared by a qualified biologist, indicates potential regulated drainage(s), subsequent consultation with appropriate regulatory agencies (depending on the agency jurisdiction[s]) and acquisition of permits, if required, prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all permit conditions.	Less than significant at a program and cumulative level
Section 3.4 – Cultural and Tribal Cultural Resources		
It cannot be certain that a significant adverse effect to one or more existing or future identified historic resources would not occur with Project implementation, despite application of applicable local, State, and federal regulations. Therefore, for	There are no feasible mitigation measures to reduce this impact, as it is the result of State mandates superseding certain aspects of the City's planning control for some parcels that include those with existing, or potentially future, eligible or known historic resources.	Significant and unavoidable at a program and cumulative level

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Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
purposes of this PEIR, the potential impact would be considered significant and unavoidable.		
Grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially encounter previously unknown/unrecorded archaeological resources, including tribal cultural resources.	**MM CUL-1** Prior to the issuance of a grading permit, Applicants for future development projects shall demonstrate to the City Community Development Department that a qualified Archaeologist has been retained by the applicant to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine when monitoring of grading activities is needed. If any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, or as determined by the Archaeologist, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the California Public Resources Code, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource", "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a Mitigation Plan in consultation with the Applicant and the City Community Development Department that satisfies the requirements of the above-listed Code sections. If the resource is determined to be a possible TCR, the City Community Development Department shall facilitate coordination with the Gabrielino Tongva Tribe, consistent with the conclusions of Native American consultation pursuant to Senate Bill 18 and Assembly Bill 52, during preparation of the Mitigation Plan. Upon approval of the Mitigation Plan by the City, the Project shall be implemented in compliance with the Plan. If the Archaeologist determines that the resource is not a "Tribal Cultural Resource", "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the	Less than significant at a program and cumulative level

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Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the City and to the CHRIS at the SCCIC at the California State University, Fullerton.	
Section 3.6 – Geology and Soils		
Grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially cause the disturbance of previously unknown paleontological resources.	**MM GEO-1** Should potential paleontological resources be found during ground-disturbing activities for any individual project implemented under the General Plan and DTSP Update & 2021–2029 Housing Element, ground-disturbing activity in the immediate vicinity of the find shall be temporarily halted and a qualified paleontologist will be hired to evaluate the resource. If the potential resource is found not to be significant by the paleontologist, construction activity in the area of the find can resume. If the resource is found to be significant, the paleontologist shall determine appropriate actions, in consultation with the City and the developer (if present), for further exploration and/or salvage. A Disposition of the Recovered Paleontological Resources and Mitigation Report shall be prepared by the qualified paleontologist and submitted to the City. Any recovered fossils shall be deposited in an accredited institution or museum, such as the Natural History Museum of Los Angeles County.	Less than significant at a program and cumulative level
Section 4.6 – Greenhouse Gas Emissions		
Because the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs identify future land uses and do not contain specific development proposals, construction-related GHG emissions are speculative and cannot be accurately determined at this stage of the planning process. Therefore, GHG emissions related to Project construction activity have not been quantified and are assumed to be a significant and unavoidable impact.	There are no feasible mitigation measures to reduce the identified construction- and operation-related GHG emissions because the finding is based on lack of project-specific details calculate emissions for individual future projects. There is no project to modify with mitigation to reduce or avoid GHG emissions. The Applicant/Developer of future development projects may demonstrate that the proposed Project is consistent with the City's CAP. If consistency is demonstrated, the Project would have a less than significant GHG emissions impact.	Significant and unavoidable at a cumulative level (GHG emissions are considered only at a cumulative level)

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
At the program level, estimated operational GHG emissions would exceed both an SCAQMD threshold and a service population threshold. While the operational emissions are highly conservative, operational GHG emissions are considered significant as the Project may generate GHG emissions that would have a significant and unavoidable impact on the environment.		
Section 3.8 – Hazards and Hazardous Materials		
There may be sites in the City impacted by hazardous materials or hazardous wastes from historic use that are not identified on current databases.	**MM HAZ-1** Prior to the issuance of a grading permit, Applicants for future development projects shall: 1) Investigate the project site to determine whether it or immediately adjacent areas have a record of hazardous material contamination via the preparation of a Phase I Environmental Site Assessment, which shall be submitted to the City Community Development Department for review. If the Phase I ESA concludes there are recognized environmental conditions that indicate the potential for on-site contamination, the Applicant shall direct the performance of a subsurface investigation appropriate in scope to the likely contaminants (e.g., water, soil, soil vapor). The results of the investigation shall be submitted to the City. 2) If contamination is identified on the site, the City, in accordance with appropriate regulatory oversight agencies (e.g., California Toxic Substances Control, Los Angeles Regional Water Quality Control Board), shall determine the need for further investigation and/or remediation of the site. If further investigation or remediation is required, it shall be the responsibility of the Applicant(s) to complete such investigation and/or remediation to the satisfaction of the City and the local oversight agency(ies). 3) Closure reports or other reports that document the successful completion of required remediation activities, if any, shall be submitted	Less than significant at a program and cumulative level

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	to and approved by acceptable to the City (as the Certified Uniform Program Agency) and the local oversight agency(ies) prior to the issuance of a grading permit for the proposed site development. **MM HAZ-2** In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction, construction activities in the immediate vicinity of the contamination shall cease immediately and the City shall be notified. If contamination is encountered, the Applicant for the proposed development shall be responsible for preparing and implementing a Risk Management Plan that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development and (2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include, but not be limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate oversight agencies shall be notified. If determined necessary by the oversight agency(ies), a Site Health and Safety Plan that meets California Occupational Safety and Health Administration requirements shall be prepared and in place prior to commencement of work in any contaminated area.	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 3.11 – Noise		
The increase in traffic noise levels due solely to the Project at adjacent uses would not result in a noticeable change in noise levels (i.e., 3 dBA) where noise levels exceed 65 dBA CNEL. However, residential uses within the focus areas would experience future exterior noise levels greater than the *normally acceptable* compatibility criteria identified in the existing General Plan Safety and Noise Element. While it may be possible to satisfy the exterior noise standards for some projects, the transportation noise levels may still exceed the exterior 65 dBA CNEL standard for some projects. Therefore, the exterior on-site transportation noise impact is considered significant and unavoidable.	**MM NOI-1** Prior to the issuance of a building permit for new residential or mixed-use development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the project will satisfy the 65 dBA CNEL exterior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.	Significant and unavoidable at a program and cumulative level
The estimated traffic noise contours indicate some focus areas would experience exterior noise levels, which exceed 70 dBA CNEL at the building facade. With typical building construction and a windows-closed condition, a minimum 25 dBA CNEL reduction is achievable for residential dwelling units. However, the minimum 25 dBA CNEL with standard building construction may result in interior noise levels greater than 45 dBA CNEL.	**MM NOI-2** Prior to the issuance of a building permit for new residential or mixed-use development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the interior noise levels in all habitable rooms will satisfy the California Building Code 45 dBA CNEL interior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.	Less than significant at a program and cumulative level
Project-related operational stationary source noise could be generated by the operation of future commercial/retail and office uses. Such noise sources could include HVAC units, loading dock	**MM NOI-3** Prior to the issuance of a building permit and/or certificate of occupancy for non-residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates:	Less than significant at a program and cumulative level

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
activities, outdoor restaurant dining and music activities, and parking lot vehicle movements.	• Exterior noise levels at adjacent property lines will satisfy the South Pasadena Municipal Code Section s19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval. The site-specific acoustical report shall identify the necessary measures, if any, required to reduce exterior noise levels to below the South Pasadena Municipal Code Section 19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval. • Acoustical isolation between units has been included in the project design for residential dwelling units situated above non-residential uses.	
Construction noise levels not including pile driving activity at receiver locations within 50 feet of construction activities, and construction noise levels including pile driving within 200 feet are anticipated to exceed the FTA noise thresholds.	**MM NOI-4** Prior to the issuance of a building permit for new development, the Project Applicant/ Developer shall submit a final acoustical report to the City of South Pasadena Community Development Department, or designee, that demonstrates: • Exterior construction noise levels at the closest sensitive receiver locations will satisfy the FTA 80 dBA Leq residential and 85 dBA Leq commercial 8-hour construction noise level standards and the County of Los Angeles 0.01 in/sec root-mean-square velocity (RMS) vibration standard. The site-specific report shall identify the necessary reduction measures, if any, required to reduce exterior noise and vibration levels to below FTA noise and County of Los Angeles vibration thresholds. • Measures to reduce construction noise and vibration levels, such as but not limited to those provided below, shall be incorporated in the final acoustical report: • Install temporary construction noise barriers at the project site boundary that break the line of sight for occupied sensitive uses for the duration of construction activities. The noise control barrier(s) must provide a solid face from top to bottom and shall: • Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;	Significant and unavoidable at a program and cumulative level

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Be properly maintained with any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired. • Install sound dampening mats or blankets to the engine compartments of heavy mobile equipment (e.g., graders, dozers, heavy trucks). The dampening materials must be capable of a 5 dBA minimum noise reduction, must be installed prior to the use of heavy mobile construction equipment, and must remain installed for the duration of the equipment use. • Construction activities requiring pile driving within 400 feet, large bulldozers within 100 feet, loaded trucks within 50 feet, or jackhammers within 25 feet of nearby sensitive land uses (e.g., residential, school) shall be minimized, or alternative equipment or methods shall be used, unless the vibration levels are shown to be less than the County of Los Angeles RMS threshold of 0.01 in/sec. **MM NOI-7** The Project Applicant/Developer for new development shall be responsible for ensuring that following requirements are implemented by the contractor throughout the construction period. Construction contractors shall be required to implement the following measures to reduce noise levels from construction activity: • equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity; • locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity; and • limit haul truck deliveries to the same hours specified for construction equipment by Section 19A.13(a) of the South Pasadena Municipal	

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
	Code. The contractor shall design delivery routes to minimize the exposure of sensitive land uses to delivery truck noise.	
Typical construction activities (i.e., non-pile-driving) associated with future development projects would exceed the County of Los Angeles vibration standard at receiver locations within 25 feet for jackhammers, 50 feet of loaded trucks, and 100 feet of large bulldozers, if used. Pile driving vibration levels would exceed the County construction vibration standard at receiver locations within 400 feet of the pile locations, if impact pile drivers are used during Project construction.	Refer to **MM NOI-4** **MM NOI-5** The Project Applicant/Developer of any site-specific development within 25 feet of an historic resource shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and, prior to the issuance of a building permit, submit evidence to the City of South Pasadena Community Development Department, or designee, that the operation of vibration-generating equipment associated with the new development would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, ground borne vibration monitoring of nearby historic structures shall be required.	Less than significant at a program level. No impact at a cumulative level as construction-related vibration effects would be geographically limited.
Some residential and non-residential uses within the focus areas are anticipated to be located within 50 feet of the Metro A Line railroad tracks and may experience vibration levels than can exceed the residential and non-residential vibration criteria for frequent rail events.	**MM NOI-6** Prior to the issuance of a building permit for new development projects within 50 feet of the Metro A Line, the Project Applicant/Developer shall submit a final vibration study to the City of South Pasadena Community Development Department, or designee, which shall identify and require implementation of reasonable and feasible vibration reduction measures to avoid exceeding the 72 VdB residential and 75 VdB non-residential vibration level standards.	Less than significant at a program level. No impact at a cumulative level as construction-related vibration effects would be geographically limited.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, MITIGATION, AND LEVEL OF SIGNIFICANCE AFTER MITIGATION

Summary of Project Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 3.12 – Population and Housing		
Buildout of the Project would exceed the population and housing growth projections presented in the SCAG 2020-2045 RTP/SCS. This is solely because the 2020-2045 RTP/SCS projections are inconsistent with the 6th Cycle RHNA.	There are no feasible mitigation measures to reduce or avoid this impact, because any such mitigation would reduce the potential housing stock to be constructed and thereby place the City in violation of both State law, opening the City to penalties, and the Court Order to which the City is subject, opening the City to Court-ordered sanctions.	Significant and unavoidable at a program and cumulative level
SCAQMD: South Coast Air Quality Management District; VOCs: volatile organic compounds; AQMP: Air Quality Management Plan; TACs: toxic air contaminants; dBA: A-weighted decibels; CNEL: community noise equivalent level; HVAC: heating, ventilation, and air conditioning; FTA: Federal Transit Administration; SCAG: Southern California Association of Governments; RTP/SCS: Regional Transportation Plan/Sustainable Communities Strategy		

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SECTION 1.0 INTRODUCTION

1.1 PURPOSE AND TYPE OF ENVIRONMENTAL IMPACT REPORT

1.1.1 BACKGROUND

Sections 65300 et. seq. of the *California Government Code* requires that each city and county adopt a comprehensive, long-term general plan for the physical development of land within its jurisdiction and sphere of influence. The City of South Pasadena (City) last updated its General Plan in 1998, with the Housing Element last updated in 2014. The existing Mission Street Specific Plan (MSSP) was adopted in 1996 as a companion document to the 1998 General Plan tailored to the particular needs of a specific area of the City. The area covered by the MSSP has been expanded to include a segment of Fair Oaks Avenue and is now referred to as the Downtown Specific Plan (DTSP). The General Plan and DTSP Update present an opportunity to re-evaluate the City's values; address broader issues; and respond to the changing economic, environmental, legal, and social settings.

The 2021–2029 Housing Element is one of the State-mandated elements of a General Plan. It identifies the City's housing conditions, needs, and opportunities; and establishes the policies and actions (programs) that are the foundation of the City's housing strategy. However, unlike all other General Plan elements, State law requires each municipality to update its Housing Element on a prescribed schedule (most commonly every eight years).

The comprehensive General Plan and DTSP Update is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live; reflect an understanding of current community goals; address continued growth pressures in the San Gabriel Valley and the demand for more diverse mobility and housing choices; and respond to evolving regional and environmental issues. The General Plan and DTSP Update serve as long-term policy guides for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City. The 2021–2029 Housing Element serves as the policy guide for decision-making regarding residential development and demonstrates how the City intends to comply with State housing legislation and regional requirements. The Housing Element was adopted in conjunction with an environmental assessment prepared pursuant to Government Code Section 65759, and thus this Program Environmental Impact Report (PEIR) focuses on the potential physical effects of Housing Element Implementation Programs, such as rezoning, that are being considered in conjunction with the General Plan and DTSP Update on the environment.

1.1.2 REGULATORY FRAMEWORK

This PEIR has been prepared to evaluate the potential environmental impacts associated with the City of South Pasadena General Plan and DTSP Update & 2021–2029 Housing Element implementation Programs (proposed Project or Project), as required under the California Environmental Quality Act (CEQA) of 1970, as amended, (*California Public Resources Code,* Section 21000 et seq.) and the State CEQA Guidelines (Title 14, *California Code of Regulations,* Chapter 3, §§15000 et seq.).

An action that has the potential for causing a physical change in the environment is considered a "project" under Section 21065 of CEQA and Section 15378 of the State CEQA Guidelines. A "project" is required to go through an environmental review process in accordance with

CEQA and the State CEQA Guidelines. While the revision/update of a policy document (such as the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs) does not directly lead to environmental impacts or changes to the environment, future development in the City, as regulated by these policy documents, would potentially result in environmental impacts. Thus, the proposed Project update is considered a "project" and is subject to the provisions of CEQA.

Since the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project has the potential for indirect environmental impacts, this EIR has been prepared at a programmatic level, as defined under Section 15168 of the State CEQA Guidelines, as:

(a) General. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

    (1) Geographically,

    (2) As logical parts in the chain of contemplated actions,

    (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or

    (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

(b) Advantages. Use of a program EIR can provide the following advantages. The program EIR can accomplish the following:

    (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action,

    (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis,

    (3) Avoid duplicative reconsideration of basic policy considerations,

    (4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and

    (5) Allow reduction in paperwork.

(c) Use with Later Activities. Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

    (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.

(2) If the agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into subsequent actions in the program.

(4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR.

(5) A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

The purpose of this PEIR is to inform the City, trustee and responsible agencies, the general public, and other interested parties of the environmental effects anticipated with the approval and implementation of the Project, as well as the environmental effects associated with future development that would be allowed under the Project. This PEIR (1) discloses information regarding potential significant adverse environmental impacts; (2) identifies measures that would be effective in reducing or avoiding any identified significant adverse impacts; (3) analyzes feasible alternatives to the Project and to future development in the City; and (4) fosters interagency coordination and public review.

This PEIR analyzes potential impacts from implementation of the Project, but not any individual development project. Therefore, with the absence of more detailed information regarding future development projects as they may be proposed, this PEIR cannot and does not evaluate detailed, site-specific, and/or project-specific impacts associated with the development of each parcel in the City. The environmental analysis in this PEIR is broader in scope than found in project-level environmental analysis and seeks to identify the general and cumulative impacts of future development and the evaluated maximum buildout and allows the City to develop area-wide mitigation and other programs to address these impacts. Refer to Section 2.0, Environmental Setting and Project Description, of this PEIR for a description of the maximum buildout scenario analyzed throughout this document.

California Environmental Quality Act and Tiering

As defined in Section 21094 of CEQA and Section 15152 of the State CEQA Guidelines, this PEIR can be used by future development proposals as part of individual and subsequent environmental reviews for proposed projects in the City, as part of a tiered approach to the environmental review process. Section 15152 of the State CEQA Guidelines, Tiering, states the following:

(a) "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the

later EIR or negative declaration solely on the issues specific to the later project.

(b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

(c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

Thus, this PEIR can facilitate the environmental review of future City programs and development proposals that are approved and implemented or constructed, respectively. Upon adoption, future development and redevelopment, as allowed under the Project, and programs called out in the General Plan and DTSP Update & 2021–2029 Housing Element, would be reviewed as required by Section 21166 of CEQA and Section 15162 of the State CEQA Guidelines.

1.1.3 LEAD AGENCY

Section 15051 of the State CEQA Guidelines identifies the lead agency as the public entity with the greatest responsibility for carrying out or approving the Project as a whole. The City has the primary authority to approve and adopt and subsequently implement the General Plan and DTSP Update & 2021–2029 Housing Element. As such, the City is serving as the Lead Agency under CEQA and is responsible for preparing this PEIR. The City, as the Lead Agency, will review and consider this PEIR in its decision to approve, revise, or deny the proposed Project, as well as take associated and subsequent actions to achieve consistency among the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs and other City regulatory tools, such as the zoning code. If adopted, the General Plan and DTSP Update & 2021–2029 Housing Element would replace and supersede the current General Plan and MSSP & 2013–2021 Housing Element , respectively.

The PEIR would facilitate the environmental review process for policies and actions in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs by identifying the potential adverse environmental changes that could occur with the approval and implementation of the General Plan and DTSP Update & 2021–2029 Housing Element

Implementation Programs. While this PEIR has been prepared with consultant support, the analysis and findings in this document have been reviewed and vetted by the City and reflect the City's conclusions and independent judgment, as required by Section 15084 of the State CEQA Guidelines.

1.1.4 OTHER AGENCIES HAVING JURISDICTION

State law requires that all EIRs be reviewed by trustee and responsible agencies. A "Trustee Agency" is defined in Section 15386 of the State CEQA Guidelines as "a State agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the State of California". Per Section 15381 of the State CEQA Guidelines, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power".

Other public agencies may also review or use this PEIR in considering permits needed for future development proposals. These agencies may use this PEIR as follows: (1) to evaluate the impacts of projects or developments on their facilities or public service levels during the processing of development and building permits; (2) in conjunction with changes in services that may occur with future development and redevelopment; and (3) to assist other agencies in planning for future facility expansions and service level upgrades needed to serve the City at the evaluated maximum buildout. These agencies may include, but are not limited to:

- California Department of Fish and Wildlife;
- California Department of Housing and Community Development;
- California Department of Transportation;
- Los Angeles County Metropolitan Transportation Authority;
- Los Angeles Regional Water Quality Control Board;
- Metropolitan Water District of Southern California;
- Sanitation Districts of Los Angeles County;
- South Coast Air Quality Management District;
- Southern California Association of Governments;
- South Pasadena Unified School District; and/or
- U.S. Army Corps of Engineers.

In accordance with Section 21081 of CEQA and Section 15091 of the State CEQA Guidelines, public agencies are required to make written findings for each environmental impact identified in the PEIR. If the Lead Agency and responsible agencies decide that the benefits of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs outweigh any identified unmitigated significant environmental effects, they will be required to adopt a Statement of Overriding Considerations supporting their actions. Future discretionary actions that would occur upon the City's adoption of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, as well as those of responsible and trustee agencies, are described in Section 2.8, Intended Uses of the PEIR.

Incorporation by Reference

As permitted by Section 15150 of the CEQA Guidelines, this PEIR has referenced several technical studies, analyses, and reports. Information from the documents, which have been incorporated by reference into this PEIR, has been briefly summarized in the appropriate sections and the relationship between the incorporated part of the referenced document and the PEIR has been described. In addition, documents and other sources that have been used in the preparation of this PEIR are identified at the end of each section of this PEIR. In accordance with Section 15150(b) of the State CEQA Guidelines, the locations where the public may obtain and review these referenced documents and other sources used in the preparation of the PEIR are also identified.

1.2 PROGRAM ENVIRONMENTAL IMPACT REPORT FOCUS

1.2.1 SCOPING PROCESS

The General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs represent the culmination of a comprehensive community outreach and involvement process and incorporates an updated community vision addressing relevant issues facing South Pasadena. The planning process for the General Plan and DTSP Update began in January 2017 and included development of a Project website (www.plansouthpasadena.org), public surveys, stakeholder interviews, a lecture series, focus group meetings, pop-up workshops, and charrettes. In addition, the City has complied with the State CEQA Guidelines requirements for providing opportunities for public participation in the environmental review process. Specifically, a Notice of Preparation (NOP) was distributed on January 25, 2018, to federal, State, regional, and local government agencies and interested parties for a 30-day public review period to solicit comments and inform agencies and the public of the Project. The City held a scoping meeting for the PEIR on February 5, 2018, at 7:00 PM, at the South Pasadena Community Room, 1115 El Centro Street. The purpose of the scoping meeting was to receive input on the environmental issues that should be addressed in the PEIR.

A Recirculated NOP (RNOP) reflecting inclusion of the 2021–2029 Housing Element into the Project was distributed on April 20, 2021. The 2021 RNOP was distributed to the same mailing list as the 2018 NOP with additions for those that submitted comments that were not on the mailing list. City staff also e-mailed the RNOP to all parties that signed up for notifications through the City's webpage for the Project as well as to the Planning Commission and City Council members. The City held a virtual scoping meeting for the PEIR for the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs on May 3, 2021, at 6:30 PM via Zoom.

For both the 2018 NOP and the 2021 RNOP, the proposed Project was described; potential environmental effects associated with Project implementation were identified; and agencies and the public were invited to review and comment on the scope of the PEIR. A copy of the NOP and RNOP and comments received are provided in Appendix A-1 and A-2, respectively, of this PEIR. Comments received on both the 2018 NOP and 2021 RNOP are considered in this PEIR. Comments on the 2018 NOP were received from 14 agencies, organizations, and individuals, and are provided in Appendix A-1 of this PEIR. The issues raised by the comment letters are summarized in Table 1-1, Summary of Responses to the 2018 NOP, along with the primary PEIR section(s) where each issue is addressed.

TABLE 1-1
SUMMARY OF RESPONSES TO THE 2018 NOP

Commentor	Comments/Issues Raised	PEIR Discussion
Agencies		
State Clearinghouse	NOP receipt	Comment acknowledged
California Department of Transportation (Caltrans)	Support for alternative transportation policies and actions; parking; Senate Bill (SB) 743 and future traffic analysis	Proposed policies related to transportation and parking are provided in the General Plan and DTSP Update. Section 3.14, Transportation, summarizes the SB 743-compliant transportation analysis conducted for the Project.
Los Angeles County Fire Department (LACFD)	South Pasadena not part of the LACFD emergency response area, and no impact on LACFD services; Forestry Division notes that impacts to erosion control, watershed management, endangered species, fuel modification, and cultural resources should be addressed	Potential impacts to the identified issues are addressed as follows: erosion control and watershed management (Section 3.9), endangered species (Section 3.3), fuel modification (Sections 3.8 and 3.16), and cultural resources (Section 3.4).
Los Angeles County Metropolitan Transportation Authority (Metro)	Gold Line light rail; Metro bus lines; transit-oriented development; Congestion Management Program traffic study requirements	Comments related to Metro's right-of-way along the Gold Line light rail, presence of Metro bus lines, and opportunities for future transit-oriented development are acknowledged. Section 3.14, Transportation, summarizes the SB 743-compliant transportation analysis conducted for the Project.
Los Angeles County Sanitation Districts (LACSD)	Wastewater generation estimate; comments on "Wastewater System" discussion in Our Well Planned Community element of the General Plan Update	Wastewater generation conveyance, and treatment information is summarized in Section 3.15, Utilities and Service Systems.
City of Monterey Park	Monterey Park has no comments	Comment acknowledged.
Metropolitan Water District of Southern California (MWD)	MWD facilities/right-of-way in and near City; MWD water use; water conservation	Comments related to MWD's right-of-way within the City is acknowledged. Water supply and conservation is addressed in Section 3.15, Utilities and Service Systems.
Native American Heritage Commission	Native American tribal consultation under AB 52 and SB 18; cultural resource assessment recommendations	AB 52 and SB 18 consultation was completed by City. Section 3.4, Cultural Resources and Tribal Cultural Resources, addresses potential impacts on tribal cultural resources and human remains based on the conduct of a Phase I Cultural Resource Assessment.
Southern California Association of Governments	Consistency with Regional Transportation Plan/Sustainable Communities Strategy goals; growth forecast	Regional Transportation Plan/Sustainable Communities Strategy goals and regional growth projections are discussed in Section 3.10, Land Use and Planning.
South Coast Air Quality Management District	Guidelines for air quality analysis, mitigation measures, alternatives, permits, and data sources	Section 3.2, Air Quality, summarizes the air quality analysis conducted for the Project.

Organizations and Individuals		
Better Space, Inc.	Request for change to proposed designation and development intensity for "Tyco Property" in the Ostrich Farm District as part of the PEIR	Changes to the proposed General Plan and DTSP Update are not enacted via the PEIR. Amendments to the plan documents would be separately considered by the City in the future, if needed.
Harry Knapp	Mix of projected vehicle traffic and public transit; water usage and supply	Transportation issues are addressed in Section 3.14, and water supply is addressed in Section 3.15.
Delaine Shane	Request for extended review period due to anticipated length of PEIR; baseline conditions; alternatives; traffic on Meridian Avenue and other collector roads; zoning for Interstate (I) 710 right-of-way	The City planned to provide a 60-day review period, more than required by CEQA and the State CEQA Guidelines, at the time of the 2021 scoping meeting. However, unavoidable time constraints related to the State-mandated deadlines for adoption of Housing Elements require a 45-day review period. Based on the scope of the PEIR, in particular its programmatic level of detail, this timeframe is considered adequate. The existing conditions considered as baseline are provided in each topical analysis in Section 3.0. Alternatives are analyzed in Section 4.0. Transportation issues are addressed in Section 3.15; this program-level analysis does not encompass specific street or intersection alterations but addresses the potential impact of the additional traffic from projected growth throughout the City pursuant to the Vehicles Miles Traveled methodology adopted in compliance with SB 743. The issue of changing the I-710 right-of-way zoning will be addressed separately from the plan documents and this PEIR; Amendments to the plan documents would be separately considered by the City in the future, if needed.
South Pasadena Public Works Commission	Project location to describe vehicular traffic patterns; analysis of I-710 early action projects; Social Equity, Aging in Place, Vision Zero concepts; alternatives; transportation/traffic analysis; green infrastructure; water and sewer infrastructure	Consistent with a program-level analysis, Section 2.0, Environmental Setting and Project Description, broadly describes both the existing traffic patterns in the City, and the noted planning concepts. As the current plan documents include the goal of Vision Zero, this is included in Section 2.4, Project Description. Alternatives are analyzed in Section 4.0. Transportation issues are addressed in Section 3.14. Green infrastructure is broadly addressed where applicable to the environmental topic, including Section 3.3, Biological Resources, Section 3.9, Hydrology and Water Quality, and Section 3.15, Utilities and Service Systems. Consistent with a program-level analysis, application of any individual policy or program, such as green infrastructure, on a certain parcel or area is not addressed. Future project-level review of individual development proposals would address the applicability of policies and programs. Water and sewer infrastructure is addressed in Section 3.15, Utilities and Service Systems.

Comments on the 2021 RNOP were received from nine agencies, organizations, and individuals, and are provided in Appendix A-2 of this PEIR. The issues raised by the comment letters are summarized in Table 1-2, Summary of Responses to the 2021 RNOP, along with the primary PEIR section(s) where each issue is addressed.

TABLE 1-2
SUMMARY OF RESPONSES TO THE 2021 RNOP

Commentor	Comments/Issues Raised	PEIR Discussion
Agencies		
State Clearinghouse	NOP receipt	Comment acknowledged.
Caltrans	Support for alternative transportation, multi-modal, complete streets, and road diet policies and actions, including use of Transportation Demand Management and Intelligent Transportation System applications; parking; SB 743 and future traffic analysis	Proposed policies related to transportation and parking are provided in the General Plan and DTSP Update. Section 3.14 summarizes the SB 743-compliant transportation analysis conducted for the Project.
California Department of Fish and Wildlife (CDFW)	Recommendation to prepare a map of specified resource-related areas, if present within or adjacent to the City; wildlife corridors and wildlife; nesting birds; loss of bird and raptor nesting habitat; bats; general comments about the scope of the PEIR; and comments regarding the scope of a "biological baseline assessment".	Biological resources, including the potential impacts identified by CDFW, are addressed in Section 3.3. It is noted that several of the areas specified in comment number one are not applicable to the City, such as conservation easements/mitigation lands, designated critical habitat, and County of Los Angeles Significant Ecological Areas.
Metro	Support for Transit Oriented Communities, multi-modal transit network and transit-supportive planning, recommendation to provide an inventory of existing and planned transit service, and analysis of potential impacts on Metro facilities	Comments related to Metro's facilities and transit-oriented development are acknowledged. The policies and actions of the General Plan and DTSP Update & 2021–2029 Housing Element reflect a continued and intensified focus on development of transit-oriented development and providing multi-model transportation. Section 3.14 summarizes the SB 743-compliant transportation analysis conducted for the Project.
LACSD	Information on LACSD jurisdictional district (No. 16), facilities, wastewater generation rates, and role related to individual future projects	Wastewater generation conveyance, and treatment information is summarized in Section 4.14, Utilities and Service Systems.
Native American Heritage Commission	Native American tribal consultation under AB 52 and SB 18; cultural resource assessment recommendations	AB 52 and SB 18 consultation was completed by City. Section 3.4, Cultural Resources and Tribal Cultural Resources, addresses potential impacts on cultural resources and human remains based on the conduct of a Phase I Cultural Resource Assessment.
Southern California Association of Governments	Consistency with 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal) goals and strategies; growth forecast; RTP/SCS PEIR mitigation measures; and Regional Housing Needs Allocation (RHNA)	The 2020-2045 RTC/SCS, regional growth projections, and RHNA allocation are discussed in Section 3.9, Land Use and Planning.

TABLE 1-2
SUMMARY OF RESPONSES TO THE 2021 RNOP

Commentor	Comments/Issues Raised	PEIR Discussion
South Coast Air Quality Management District	Guidelines for air quality analysis and mitigation measures, and data sources	Section 3.2, Air Quality, summarizes the air quality analysis conducted for the Project.
Organizations and Individuals		
Josh Albrektson	This summary reflects 22 e-mails submitted on May 24, 2021. Comments regard the feasibility and/or legality of the Suitable Sites Inventory of the 2021–2029 Housing Element, and the suitability of assumptions related to the 2021–2029 Housing Element. No comments related to the environmental analysis of the planning documents was provided.	There were no comments related to the environmental analysis of the General Plan and DTSP Update & 2021–2029 Housing Element in this PEIR. Section 2.0, Environmental Setting and Project Description, summarizes the proposed planned documents to the degree appropriate to facilitate the environmental analysis. It is noted that a full draft of the 2021–2029 Housing Element was not yet completed at the time of the comments and preparation of the document continued through release of the Draft Housing Element along with public release of this PEIR.

The City determined that implementation of the proposed Project has the potential to impact the following environmental topics:

- Aesthetics (Section 3.1),
- Air Quality (Section 3.2),
- Biological Resources (Section 3.3),
- Cultural and Tribal Cultural Resources (Section 3.4),
- Energy (Section 3.5),
- Geology and Soils (Section 3.6),
- Greenhouse Gas Emissions (Section 3.7),
- Hazards and Hazardous Materials (Section 3.8),
- Hydrology and Water Quality (Section 3.9),
- Land Use and Planning (Section 3.10),
- Noise (Section 3.11),
- Population and Housing (Section 3.12),
- Public Services and Recreation (Section 3.13),
- Transportation (Section 3.14),
- Utilities and Service Systems (Section 3.15), and
- Wildfire (Section 3.16).

The City determined there would be no impacts to the following environmental topics: Agriculture and Forestry Resources and Mineral Resources. There are no agriculture,

forestry, or mineral resources existing in the City. These topics are not separately addressed in Section 3.0 of this PEIR.

The PEIR analyzes the effects of the maximum growth projected under the General Plan and DTSP Update & 2021–2029 Housing Element. Refer to Section 2.0, Environmental Setting and Project Description, for further details.

1.3 PROJECT SPONSOR AND CONTACT PERSON

The Project is a City-sponsored endeavor. All inquiries regarding the Project and the PEIR should be directed to:

Ms. Alison Becker, AICP
Deputy Director–Community Development Department
1414 Mission Street
South Pasadena, California 91030
CDD@southpasadenaca.gov
Phone: 626.403.7220

1.4 PUBLIC REVIEW OF THE DRAFT PEIR

The Draft PEIR for the Project is being distributed to responsible and trustee agencies, other affected agencies, surrounding cities, interested parties, and all parties who requested a copy of the PEIR in accordance with CEQA. During the 45-day public review period, this Draft PEIR, including the technical appendices, is available for review online at: https://www.southpasadenaca.gov/government/departments/planning-and-building/general-plan-downtown-specific-plan-update/program-environmental-impact-report.

Additionally, a hard copy of the PEIR is available at each of the following locations during regular business hours:

City of South Pasadena
Community Development Department
1414 Mission Street
South Pasadena, California 91030
626.403.7220

South Pasadena Public Library
1100 Oxley Street
South Pasadena, California 91030
626.403.7340

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SECTION 2.0 ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The City of South Pasadena (City) is located on the western edge of the San Gabriel Valley area of Los Angeles County (County), approximately 5 miles northeast of downtown Los Angeles. The City is surrounded by several municipalities, including the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and the City of Los Angeles neighborhoods, including Garvanza and Highland Park, to the west. Regional access to the City is provided predominantly by State Route 110 (SR-110, Arroyo Seco Parkway), which transects the City. Interstate 210 (I-210) and SR-134 also provide regional access, with the nearest ramps situated approximately 1 mile north of the northern City boundary. The Los Angeles County Metropolitan Transportation Authority (Metro) A Line provides transit/rail access to downtown Los Angeles, City of Pasadena, and the northern San Gabriel Valley. The City's location and regional setting is shown on Exhibit 2-1, Regional and Local Vicinity.

2.2 PROJECT SETTING AND CHARACTERISTICS

The planning area for the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element (proposed Project; Project) includes approximately 3.5 square miles, or 2,272 acres, within the incorporated City of South Pasadena limits. The DTSP Update is a companion document to the General Plan Update; the DTSP area encompasses approximately 80 acres along the intersecting "main street" corridors of Mission Street and Fair Oaks Avenue. The area encompassed by the proposed DTSP Update is discussed further below. Unless otherwise specified, "proposed Project" or "Project," as more specifically described below, refers to all proposed planning documents (i.e., General Plan Update, DTSP Update, and 2021–2029 Housing Element Implementation Programs) and applies to all properties within the planning area.

2.2.1 REGIONAL SETTING

The City is located within the County of Los Angeles, which occupies a 4,084-square-mile area in the Southern California region and consists of 88 incorporated cities and scattered unincorporated communities. The total population in the County is estimated at 9,649,779 persons within a housing stock of 3,635,915 units, according to the most recent California Department of Finance demographic data (DOF 2022). Based on employment estimates from the most recent California Employment Development Department data, show the County's labor force at 4,960,500 persons and a 5.2 percent unemployment rate (EDD 2022).

The San Gabriel Valley (Valley) is an approximately 400-square-mile area at the eastern portion of Los Angeles County. It is home to approximately 1.8 million persons living in 31 cities and 5 unincorporated communities (LAEDC 2023). The Valley is bound on the north by the San Gabriel Mountains, on the west by the Repetto Hills, on the south by the Puente Hills, and on the east by the San Jose Hills. The Rio Hondo and San Gabriel Rivers flow from the San Gabriel Mountains on the north through the San Gabriel Valley, toward the Pacific Ocean on the south. Regional access in the Valley is provided by the I-210, I-10 and SR 60 Freeways, which run east-west through the Valley, and by the I-605, SR-57 and SR-710 freeways, which run north-south through the Valley.

2.2.2 LOCAL ENVIRONMENTAL SETTING

City Characteristics

The City of South Pasadena's land use pattern is well established and largely built out, with limited available vacant or underutilized land throughout the City. The City's development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses generally located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road/Pasadena Avenue.

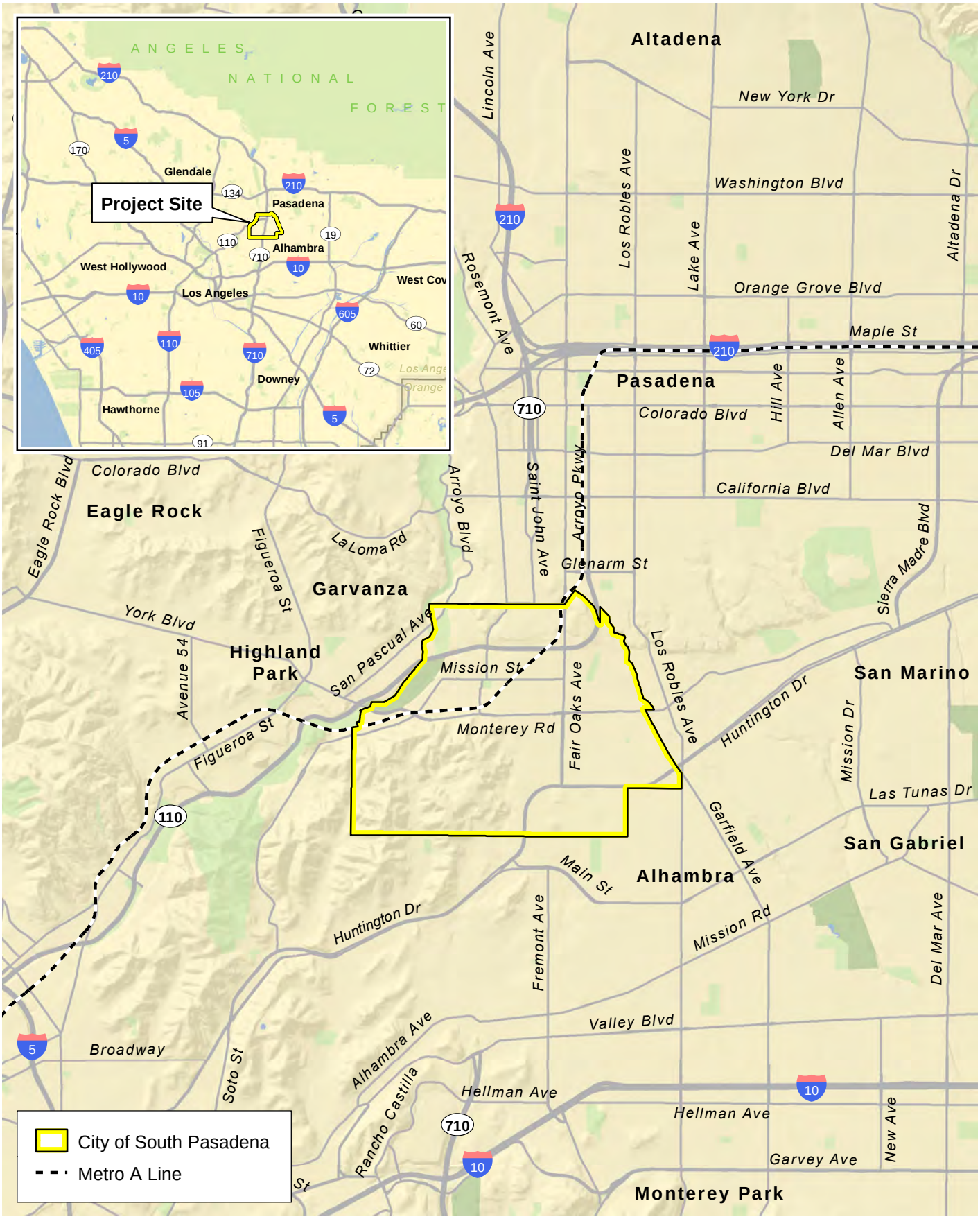
The City's circulation network is largely a grid system of north/south and east/west roads. The exception to the grid system is the southwest quadrant of the City that has curvilinear streets developed to fit the topography of the area. From a regional transportation perspective, the City lies at the crossroads of several regional transportation facilities. Regional facilities that traverse the City include SR-110 (Pasadena Freeway), Huntington Drive (regional arterial), Monterey Road (regional arterial), and Fair Oaks Avenue (regional arterial) (South Pasadena 2001). The northwesterly extension of the County of Los Angeles Metropolitan Transportation Authority (Metro) Light Rail Line, the A Line, passes through the City of South Pasadena, with a station at the intersection of Mission Street and Meridian Avenue. Both fixed-route bus transit service and paratransit service operate within the City. Demand-responsive transit service is provided by South Pasadena Senior Ride. This Dial-A-Ride service provides transportation for local trips and medical appointments primarily to senior citizens and is also available to persons with a disability.

The City's estimated 11,156 dwelling units (DUs), that house the City's population of 25,580 (DOF 2022), are comprised of nearly equal number of single-family and multi-family units. The City's existing characteristics and land use are discussed further below and in Section 3.10, Land Use and Planning, of this Program Environmental Impact Report (PEIR).

Air Quality and Climate

The City is located in the South Coast Air Basin (SoCAB) within the jurisdiction of South Coast Air Quality Management District (SCAQMD). The distinctive climate of the Project area and the SoCAB is determined by its terrain and geographical location. The SoCAB in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. Regional air quality is defined by whether the area has attained State and federal air quality standards, as determined by air quality data from various monitoring stations. All of the County is designated as a nonattainment area for O_3, PM10, and PM2.5; portions of the County, not including the City, are designated nonattainment for NO_2 and lead.

Air quality in the City may be characterized by readings at the Pasadena–South Wilson Avenue monitoring station, located approximately 1.8 miles to the northeast. Pollutants measured at this monitoring station include O_3, $PM_{2.5}$, and NO_2. The 2021 (most recent data available) readings show that the State 8-hour standard for O_3 was exceeded a total of 32 days; the 1-hour standard was exceeded a total of 12 days; and the federal 24-hour standard for PM2.5 was exceeded 2 days. Air quality is discussed in Section 3.2 of this PEIR.



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Regional and Local Vicinity

Exhibit 2-1

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

N W E S

1 0.5 0 1 Miles

PSOMAS

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Biological Resources

Vegetation within the City consists largely of non-native ornamental trees, grasses, and shrubs that are typical of urban landscaping. The City of South Pasadena contains a high percentage of tree canopy cover, and many areas with a native tree canopy due to the presence of a large number of Coast live oak (*Quercus agrifolia)* trees, which are protected by City ordinance Chapter 34 of the South Pasadena Municipal Code (SPMC). Other vegetated or otherwise open areas include parks distributed throughout the City, along the Arroyo Seco, and undeveloped land along steep hillsides in residential areas of the southwestern portion of the City. The Arroyo Seco generally runs from north to south along the northwestern boundary of the City. This portion of the stream is concrete lined with no native substrate. The vegetation along the Arroyo Seco route is mostly comprised of ornamental trees, which are located above the manufactured, reinforced banks of the stream.

Most of the drainage features within the City do not contain water year-round, with the occasional exception of the Arroyo Seco. Jurisdictional resources (i.e., drainages under the jurisdiction of a resources agency, such as California Department of Fish and Wildlife) within the City of South Pasadena are mostly confined to concrete-lined drainages with no associated vegetation. The concrete-lined drainages across the City are numerous and disperse. Biological resources are discussed in Section 3.3 of this PEIR.

Cultural Resources

The City experienced substantial development activity in the 1880s, upon the arrival of railroad lines to the area, and was incorporated in 1888. Most of the developable land within the City was built out by World War II, aside from two areas that were seen as prime development sites: the location of the demolished Raymond Hotel, and the Monterey Hills area near the southwest corner of the City, which were both then targeted for development. Since the City is an established community that was largely built out by World War II, the number of properties dating to the post-war era and more contemporary periods of history is generally less than other municipalities in Southern California, and as such there is an abundance of historic properties. According to City records, there are seven individual properties and two historic districts which are listed in the National Register of Historic Places. In addition, there are approximately 183 properties and two historic districts included in the California Historical Resources Inventory, 59 designated local landmarks and five locally designated historic districts., and 2,257 additional properties that have been identified as potentially eligible historical resources (HRG 2017). There are no known archaeological resources in the City. Cultural resources and tribal cultural resources are discussed in Section 3.4 of this PEIR.

Geology and Topography

The City is located along the west-central boundary of the San Gabriel Valley, which is bound on the north by the San Gabriel Mountains, on the west by the Repetto and Merced Hills, on the south by the Puente Hills, and on the east by the San Jose Hills. Erosion of the San Gabriel Mountains has formed fan-shaped alluvial wedges that fill the San Gabriel Valley. Accordingly, the majority of the City is underlain by Pleistocene- and Holocene-age alluvial deposits comprised primarily of sand, silt, and gravel. The City is relatively flat with a gentle slope to the south, with steeper hillside areas primarily in the southwest portion of the City. Elevations within the City range from approximately 530 feet above mean sea level (amsl) to 910 feet amsl.

The east-west trending Raymond Fault passes through the northern portion of the City, as well as the cities of San Marino, Pasadena, Arcadia, and Los Angeles. This fault is considered active and the California Geological Survey (CGS) has established an Alquist-Priolo Earthquake Fault Zone on the entire segment. Other faults that may affect the City include the Upper Elysian Park blind thrust, the Eagle Rock, Sierra Madre, Hollywood, and Santa Monica faults, and other regional active faults. Fault rupture, strong ground shaking, liquefaction, and landslide are potential geotechnical hazards present in the City. Geology is discussed in Section 3.6 of this PEIR.

The setting of all other environmental topics is discussed under the header "Existing Conditions" in Sections 3.1 through 3.16 of this PEIR.

2.2.3 RELEVANT PLANNING CONSIDERATIONS

Regional Plans

South Pasadena is within the boundaries of, and subject to, several regional plans and policies. These include the Southern California Association of Governments' (SCAG) Regional Housing Needs Assessment (RHNA) and Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP); and the Regional Water Quality Control Board's (RWQCB) *Water Quality Control Plan for the Los Angeles Region*. These plans are discussed within each applicable topical issue in Section 3.0 of this PEIR.

Local Plans

A number of plans and policies adopted by South Pasadena regulate development in the City. The most applicable of these are discussed below.

South Pasadena General Plan

The State's Planning, Zoning, and Development Laws (Section 65000-66037 of the *Government Code*) call for the preparation, review, and revision of a General Plan for each county and city. Section 65300 of the *Government Code* states:

> Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning. Chartered cities shall adopt general plans which contain the mandatory elements specified in Section 65302.

For cities, the general plan guides the development of the incorporated city, plus any land outside city boundaries that has a relationship to the city's planning activities. This area outside a city's boundaries is called the Sphere of Influence (SOI). The City of South Pasadena SOI is coterminous with its corporate boundaries, as its jurisdictional boundaries align with and abut adjoining cities or County of Los Angeles lands.

The *City of South Pasadena General Plan* (General Plan) was last updated in 1998, with the Housing Element last updated in 2014 to address the City's future housing needs for the 2014 to 2021 planning period. The General Plan sections each contain an overarching goal with supporting policies and actions as well as programs for the development and conservation of land

within the City and regulates all development within the City's incorporated area. The City's existing General Plan is described further below in Section 2.3.1.

Mission Street Specific Plan

Under State law (Section 65450 et. seq. of the Government Code), a municipality may use a specific plan to develop detailed regulations, programs, and/or legislation to implement its adopted general plan for a specific area within its local jurisdiction. The Mission Street Specific Plan (MSSP) was adopted in 1996 (South Pasadena 1996). The key actions identified in the MSSP, which must be taken by the City and by property owners, merchants, and residents to implement the MSSP, include:

- Provide a central parking facility to serve the Blue Line (now A Line) station;
- Establish a Business Improvement District (BID) to help finance parking and streetscape improvements;
- Hire a manager to attract desirable businesses, implement streetscape improvements, and promote the MSSP area;
- Increase the water pressure so that on-site pumps are not required for second and third story uses.

The existing MSSP is described further below.

South Pasadena Municipal Code

The *South Pasadena Municipal Code* regulates the operations and activities in the City. Chapter 36 "Zoning" of the SPMC, or the Zoning Code, contains development standards and design regulations for new development in the City to assist in the implementation of the City's General Plan and to protect and promote the City's public health, safety, comfort, convenience, prosperity, and general welfare. Applicable portions of the SPMC are discussed under the header "Relevant Programs and Regulations" in Sections 3.1 through 3.16 of this PEIR.

Design Guidelines

In 2009, the City adopted the *City of South Pasadena Residential Design Guidelines* and the *City of South Pasadena Commercial Design Guidelines* (South Pasadena 2009a, 2009b). The City's design guidelines increase the awareness of building owners and designers to the architectural, historic, and site planning features that are traditional to the City and emphasize the importance of preserving and maintaining those features when making alterations or designing new construction.

Cultural Heritage Ordinance

The City's Cultural Heritage Ordinance has been utilized since 1992 as a tool for implementing the City's preservation efforts. On July 19, 2017, the City Council adopted Ordinance No. 2315 that repealed the ordinance in place at that time and replaced it with a new ordinance (SPMC Section 2.61) that helps property and business owners gain a clear understanding of the Cultural Heritage Commission's (CHC) purpose and processes, assists the CHC with its decision making, and strengthens the City's legal framework to maintain its historic character and scale. The purpose of the Cultural Heritage Ordinance "is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of improvements,

buildings, structures, signs, objects, features, sites, places, landscapes, and areas representing the City's architectural, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage" (South Pasadena 2017).

Green Action Plan

On November 20, 2019, the City Council approved the *South Pasadena Green Action Plan* (Green Plan) (South Pasadena 2019). To further strengthen the City's commitment to sustainability, City staff, with the help of South Pasadena residents and businesses, and the Natural Resources and Environmental Commission (NREC), gathered and prioritized five sustainability initiatives that comprise the Green Plan. The short-term initiatives in this plan are intended as steppingstones for the Climate Action Plan (CAP). The CAP is a longer-term sustainability plan that will aim to reduce the City's greenhouse gas (GHG) emissions.

Climate Action Plan

The City adopted its first CAP on December 16, 2020. The CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. The City's Public Works Department has the primary responsibility to implement the CAP. The CAP analyzes emission sources within the City, forecasts future emissions, and establishes emission reduction targets. This CAP is the City of South Pasadena's roadmap to achieving the City's 2030 target and state mandated goal of 40 percent below 1990 levels by 2030, with the ultimate goal of achieving carbon neutrality by 2045. The CAP also establishes a framework for implementation and monitoring of reduction activities, and further promotes adaptation and preparedness actions. The plan is intended to be a qualified GHG Reduction Plan and meets the requirements of Section 15183.5(b) of the State CEQA Guidelines (South Pasadena 2020a). The CAP states, "In the City of South Pasadena, the most pronounced effects of climate change will be increased average temperature, more days of extreme heat, and elevated drought risk, all of which may lead to increased wildfires."

Neighborhood Traffic Management Program

The City of South Pasadena Neighborhood Traffic Management Program (NTMP) is a citywide initiative to empower citizens to address traffic calming concerns. The need for the program stemmed from the City's desire for an equitable, systematic, and easily accessible approach to handling neighborhood traffic calming requests. The NTMP provides a framework for the selection, application, and implementation of traffic calming improvement measures, contingent upon available funding, in the City of South Pasadena. Annually, the City Council designates funding for the NTMP to allow data collection, traffic studies, and implementation of traffic calming features.

2.3 PROJECT BACKGROUND AND CONTEXT

The City's General Plan guides the physical, economic, social, and environmental well-being of the city through establishing goals, policies, actions and/or programs for achieving the community's vision for its future. A housing element is one of the State-required general plan elements. The current documents do not align with the City's vision for its future and with the need to provide housing in compliance with State law. Therefore, the City is undertaking the Project to align goals, policies, and actions with the vision.

2.3.1 6TH CYCLE HOUSING ELEMENT LAWSUIT AND APPROVAL

The City was the subject of a Court Order[1] to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. In April 2022, a lawsuit was filed alleging that the City was in violation of State Planning Law because the City had not adopted a 6th Cycle Housing Element by the State's statutory deadline of October 15, 2021. The lawsuit was titled *Californians for Homeownership V. City of South Pasadena, LASC Care Nos. 22STCP01388.* It is noted that by October 15, 2021, none of the 197 jurisdictions within SCAG had adopted a housing element that HCD found to be in compliance with State law. This reflects the difficulties most municipalities are facing with preparing a 6th cycle housing element that accommodates the high RHNA allocations throughout the SCAG region.

In August 2022, a Stipulated Judgment was entered on the lawsuit requiring certain actions by the City within certain time period to bring the Housing Element into compliance with Section 65754 of the Government Code. As part of this Court Order, pursuant to Government Code Section 65759(a), an agency under such court order is required to prepare an Initial Study, with substantially the same information required pursuant to Section 15080(c) of Title 14 of the California Code of Regulations (i.e., CEQA Guidelines) (Government Code Section 65759(a)(1)). Should the Initial Study demonstrate that associated actions may have a significant effect on the environment, the agency shall then prepare, within the time limitations specified, an Environmental Assessment (EA), the content of which substantially conforms to the required content for a draft environmental impact report set forth in Article 9 (commencing with Section 15140) of the CEQA Guidelines (Government Code Section 65759[a][2]).

All other provisions of CEQA, Division 13 of the Public Resources Code (commencing with Section 21000), do not apply to any action necessary to bring the general plan or relevant elements of the plan (in this case the City's Housing Element) into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]).

Therefore, the City prepared an Initial Study and EA in compliance with Government Code Section 65759, et. seq. and the EA was considered by the Planning Commission and City Council during public hearings on the Housing Element. On May 16, 2023, the City received a letter from the California Department of Housing and Community Development (HCD) stating that the revised Housing Element (dated May 5) meets the statutory requirements of State Housing Element Law. On March 17, 2023, the Planning Commission considered the Housing Element, Initial Study, and EA, among other documentation, and adopted a resolution recommending the City Council adopt the EA and approve the Housing Element. On May 30, 2023, City Council adopted the EA and approved the 2021–2029 Housing Element.

While the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs.

[1] Stipulated Judgment (*Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*).

2.3.2 EXISTING PLANNING DOCUMENTS

The City is a general-law city[2], incorporated in 1888, with its first General Plan adopted in 1963 (except the first Housing Element, which was adopted in 1984). The *South Pasadena General Plan* has been amended over the years; the current General Plan was adopted by the City in 1998, and the *2014–2021 Housing Element* was adopted in 2014, in accordance with State laws (South Pasadena 1998, 2014). State law requires the Housing Element to be updated every eight years to align with SCAG's adoption of its RTP/SCS. The currently adopted (1998) General Plan includes the following seven elements:

- Land Use & Community Design (addressing land use and development issues);
- Circulation & Accessibility (addressing transportation issues);
- Economic Development & Revitalization (addressing economic issues);
- Historic Preservation (addressing historic resource issues);
- Housing (addressing housing issues);
- Open Space & Resource Conservation (addressing natural and open space resource issues); and
- Safety & Noise (addressing public health and safety issues).

The goals and policies of the *Land Use & Community Design Element* (Land Use Element) are further interpreted in the form of a diagram, referred to as Land Use Policy Map, which defines the general location and development intensity/density of these uses within the City. Exhibit 2-2, Existing Land Use Policy Map, depicts the current land use plan for the City. The expected level of development represented by the General Plan is also quantified in the Land Use Element, reflecting the building intensity and population density standards for various areas and other territory set forth at the time of adoption. The previous, 5th Cycle (2012), RHNA indicated that the City had a need for 63 DUs to be provided, distributed across the four income levels established by HCD. As discussed above, the 6th Cycle Housing Element has been approved and demonstrates the capacity for 2,775. While environmental documentation required pursuant to the Court Order was prepared and considered by the City prior to approval of the 2021–2029 Housing Element; this PEIR also considers the growth possible from the 2021–2029 Housing Element Implementation Programs as well as the General Plan and DTSP Update.

Environmental Baseline

Pursuant to CEQA and the State CEQA Guidelines, the assessment of environmental impacts from buildout of the City pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element is compared to land uses under existing conditions at the time the Recirculated Notice of Preparation (RNOP) was distributed (i.e., April 2021), unless otherwise noted, rather than the increase in development proposed in the 1998 General Plan. The latter is referred to as "plan to plan" analysis and is not permitted under CEQA and the State CEQA Guidelines. However, for informational purposes only, Table 2-1, 1998 General Plan (2010 Forecast) and Existing Land Uses, presents the existing land uses in terms of total residential and non-residential acres within the City. The GIS analysis to establish existing land uses in the City in 2018 is essentially the same as at the time the Recirculated Notice of Preparation was released in April 2021.

[2] A city that is organized under, and bound by, the general laws of the State (California Government Code), regardless of whether the subject concerns a municipal affair.

TABLE 2-1
EXISTING LAND USES

Land Use Category (1998 General Plan)	Existing (2018) (Acres)[a]
Residential	
Altos de Monterey	234.2
Estate/Very Low Density	215.6
Low Density	645.9
Medium Density	173.0
Medium-High Density	0.0
High Density	117.8
Subtotal	*1,386.3*
Commercial	
Neighborhood	0.0
General	64.8
Subtotal	*64.8*
Office	
Professional	16.9
Other	0.0
Subtotal	*16.9*
Other Land Uses	
Mission Street Specific Plan	40
Mixed Use	0.0
Light Industrial	12.2
Community Facilities	85.0
Other[b]	667.0
Total All Land Uses	***2,272***

Note: Some totals may not add due to rounding.

[a] City-wide acreage updated from the numbers provided in the 1998 General Plan based on the results of a Geographic Information System (GIS) assessment of City lands. Over time, GIS technology becomes more sophisticated and allows a higher degree of accuracy.

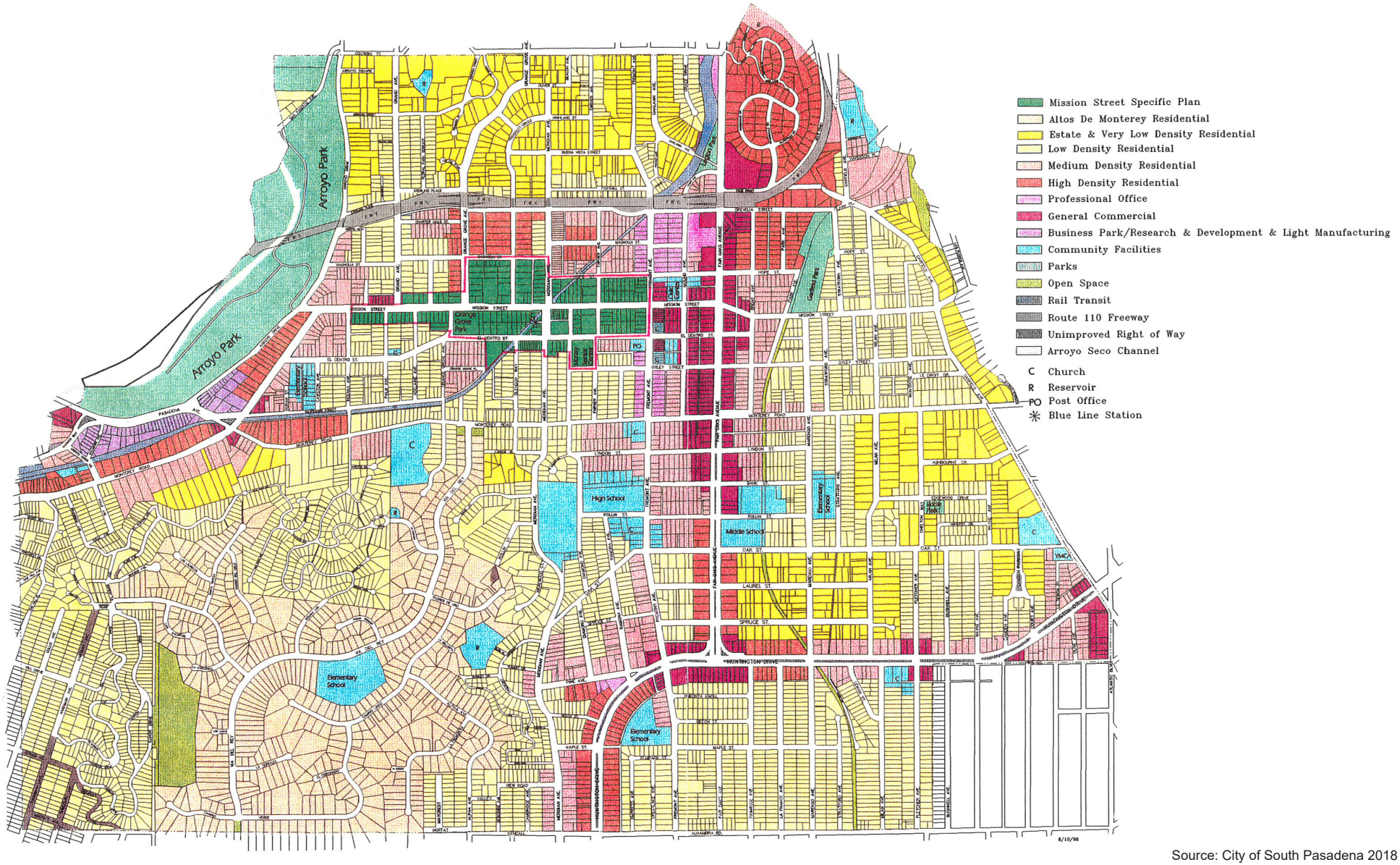
[b] Includes open space, parks, utility, and right-of-way.

Source: Inloes 2018.

2.3.3 EXISTING MISSION STREET SPECIFIC PLAN

The Mission Street Specific Plan (MSSP) was adopted in 1996 and is now expanded to include a segment of Fair Oaks Avenue and the name changed to the Downtown Specific Plan (DTSP). As with the proposed update, the MSSP is a companion document to the 1998 General Plan, tailored to the particular needs of a specific area of the City. The MSSP includes the Mission Street right-of-way from Pasadena Avenue to Fair Oaks Avenue, parcels fronting Mission Street between Fremont Avenue and Indiana Avenues, and areas to the north and south of Mission Street between Fremont Avenue and Orange Avenues. Exhibit 2-3, Mission Street Specific Plan Area, provides an illustration of the geographic area covered by the MSSP.

When adopted, the MSSP supplemented and refined the City's Zoning Code and other relevant ordinances. The MSSP regulations are equivalent to Zoning Code regulations. All other provisions of the Zoning Code and other ordinances apply to the MSSP area.



Source: City of South Pasadena 2018

Existing Land Use Policy Map

Exhibit 2-2

South Pasadena General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

N W E S

0 500 1000 2000 Feet

PSOMAS

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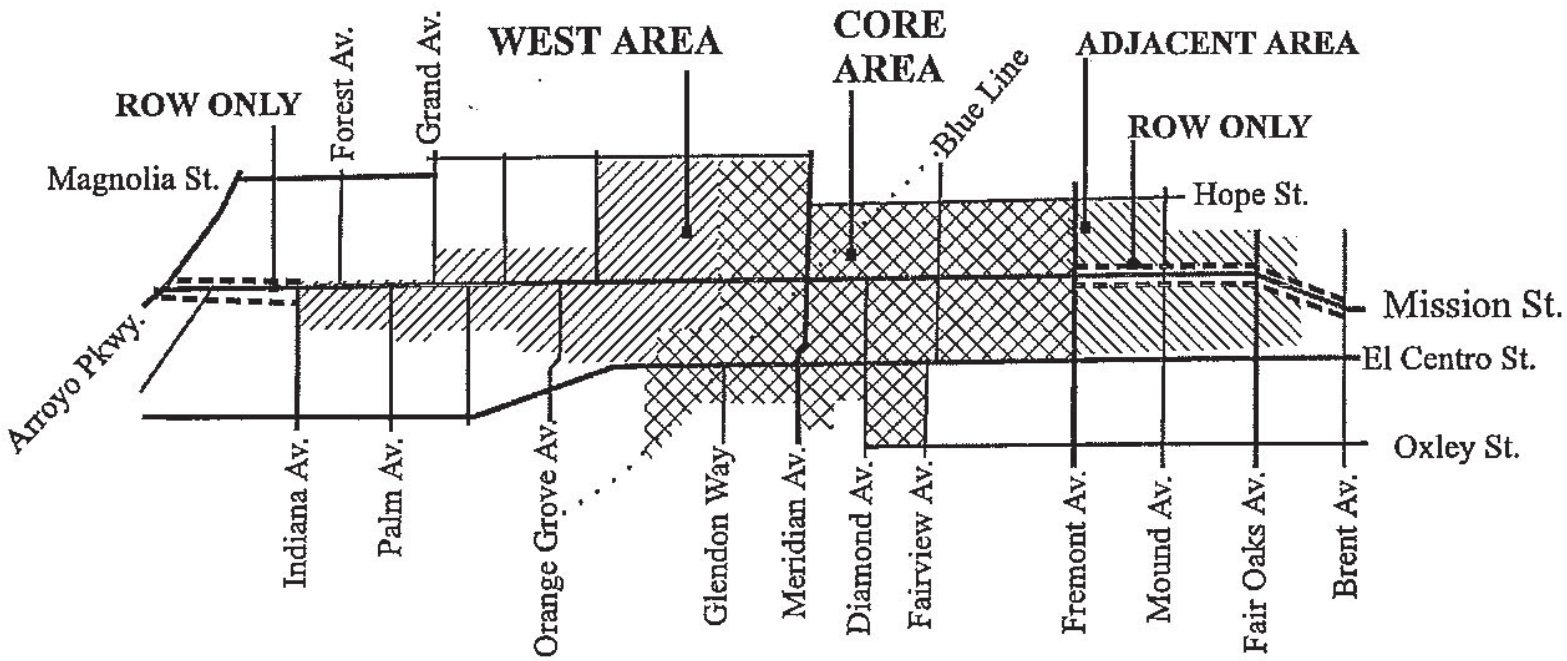

Source: City of South Pasadena 1996

Mission Street Specific Plan Area

Exhibit 2-3

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

PSOMAS

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2.4 PROJECT DESCRIPTION

2.4.1 PURPOSE AND USE OF THE PLANNING DOCUMENTS

This PEIR evaluates the environmental impacts of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, inclusive of rezoning required to implement the Housing Element, and especially those programs with early implementation deadlines (program 2.h, 2.j, 3.b, 3.n and 5.b). The Project presents an opportunity to re-evaluate the City's values; address broader issues; and respond to changing economic, environmental, legal, and social settings. City of South Pasadena decision-makers will use the Project documents, in combination with the SPMC and other City plans and programs, for direction when making land use and public service decisions over the documents' approximate 20-year horizon through 2040 (eight years for the Housing Element). Once adopted, a general plan does not remain static. As time passes, assumptions made as part of the general plan map may no longer be valid due to changing circumstances or new information. The effectiveness of programs should be evaluated and reported to decision-makers so those programs can be continued, modified, or replaced in order to continue progress towards the established goals and policies. State law provides for this by allowing amendment to any of the elements of a general plan up to four times a calendar year. This limitation does not apply to amendments of optional elements or components; amendments requested and necessary for affordable housing; and amendments necessary to comply with a court decision involving the legal adequacy of the general plan. State general plan guidelines direct the City's Community Development Department to report annually to the City Council on the status of the current General Plan and progress in its implementation.

The environmental analysis in this PEIR is based on the content of the approved Housing Element Implementation Programs (dated May 2023), public review drafts of the General Plan and DTSP Update (dated July 2023) and a baseline of April 2021 (distribution of the RNOP of the PEIR), unless otherwise noted. Some analyses consider 2022 and 2023 conditions, dependent on public data availability. Future amendments and other revisions to the General Plan and DTSP Update would be reviewed individually pursuant to CEQA as appropriate.

2.4.2 PLANNING PROCESS

As noted above, pursuant to State law, the City of South Pasadena has an approved General Plan. State law does not require a General Plan to be updated in regularly scheduled intervals, except for the Housing Element. However, a General Plan needs to be updated if it is to reflect community values and priorities as they change over time. General Plan updates typically range between every 20 to 30 years. In 2017, the comprehensive update to the General Plan and DTSP Update was initiated to refresh City policies, with a commitment to protecting the characteristics that make South Pasadena a desirable place to live while addressing the continued growth pressures in the San Gabriel Valley, the demand for more diverse mobility and housing choices, and evolving regional and environmental issues. The General Plan and DTSP Update portion of the Project represents the culmination of a comprehensive community outreach and involvement process that began in January 2017 to re-envision land use and community space in South Pasadena and continued through Fall 2019. The City's team for the General Plan Update consisted of an Executive Team, an Advisory Committee, and six Focus Groups. The Executive Team included key City staff members with a primary responsibility to keep the update process on schedule and within budget. The Advisory Committee included City Council members, Planning Commissioners, and department heads that provided on-going direction. Focus Groups supported the public outreach process in developing policy options and actions to implement the public's vision. The public outreach process included development of a Project-specific website,

social media engagement, e-mail notifications, public surveys, pop-up workshops, stakeholder interviews, a lecture series, over ten Focus Group meetings, pop-up workshops, and a five-day visioning charrette. After a pause in preparation of the General Plan and DTSP Update documents, a series of three public meetings were held to provide the community with the current status of the Project and its path forward. The process was put on hold as the City awaited clarification of an anticipated significant housing allocation through the State RHNA process, which would likely be different than the housing capacity being considered at that time. When the RHNA was finalized at 2,067 housing units, necessary adjustments were proposed for the General Plan and DTSP Update, increasing capacity, including an affordable housing overlay, and revising the principles to reflect housing as a greater priority.

The Housing Element process included several virtual public workshops, multiple presentations to Planning Commission and City Council on the housing element, feedback from HCD reviewers, and related revisions to strategies and development of new program proposals from July 2020 through May 2023. In March 2021, the City participated in HCD's informal review process, presenting the State agency with a conceptual strategy for the housing element to comply with the RHNA. A Planning Commission study session was held in June 2021, which included discussion of HCD feedback about this approach. Input from these workshops and presentations was combined with the requirements of State housing law to develop the Draft 2021–2029 Housing Element and to revise the General Plan and DTSP accordingly. The City's civic engagement process continued during preparation of public drafts of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, through online distribution and subsequent Planning Commission hearings, public meetings, and formal public comment periods where comments were received and considered in subsequent revisions to the draft planning documents. The full outreach process is described in Part 1, Introduction, of the General Plan Update. Please refer to the entirety of the proposed General Plan and DTSP Update and the 2021–2029 Housing Element documents online at:

- https://www.southpasadenaca.gov/government/departments/planning-and-building/general-plan-downtown-specific-plan-update; and
- https://www.southpasadenaca.gov/government/departments/planning-and-building/housing-element-update-2021-2029.

2.4.3 OVERVIEW OF PLANNING TERMS AND PRIMARY GOALS

The General Plan and DTSP Update each include nine chapters, and each of the chapters features an overarching goal, with policies and actions based on the goal. The nine chapters, their guiding principles, and their contents (i.e., goals, policies, actions), reflect the public visioning process while balancing State-mandated legislative requirements (including the 2021–2029 Housing Element), the City's budget, and feasibility of future activities. The General Plan and DTSP Update in progress would serve as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City through the year 2040. As part of this effort, the City's existing General Plan has been reorganized and reformatted to reflect both current State regulations and the community's vision for the City.

Goals and policies, and actions as used in the Project are defined below:

- **Goals** are long-range, broad, and comprehensive targets. Goals are not necessarily measurable or achievable; rather, they describe a desired end-state condition for South Pasadena.
- **Policies** describe a commitment to a particular course of action in place or to be put in place that will help achieve an associated goal. Policies are specific statements that guide decision-making.
- **Actions** are implementation steps that carry out a policy. They are the critical link between long-range planning and decision-making, as well as actual activities taking place by residents or the City.

The guiding principles of each of the nine chapters are as follows:

- **Our Natural Community.** Live in balance with our natural environment. Preserve the natural areas and increase the quantity and access to open space.
- **Our Prosperous Community.** Attract and retain high-value, high-wage jobs within the creative sector, diversify the local economy, promote and support local businesses, and increase the local tax base to help fund vital public services.
- **Our Well Planned Community.** Direct new growth to the downtown area along Mission Street and Fair Oaks Avenue while protecting the stable residential areas from runaway growth. Develop clear and precise objective standards that offer predictable outcomes and processes. Encourage pedestrian-oriented mixed-use development, while providing new and enhancing existing public spaces and gathering places.
- **Our Accessible Community.** Provide safe access for all street users–pedestrians, cyclists, public transit users, and motorists–of all ages and abilities. Support an integrated multi-modal network and efficiently manage parking to support wider community goals.
- **Our Resilient Community.** Increase individual, institutional, and business capacity to survive, adapt to any chronic stress or acute shocks and be able to recover and thrive.
- **Our Healthy Community.** Create environments that encourage healthy lifestyles and maximize opportunities for physical activity. Well-designed public and semi-public realms foster social interaction, and good programming can draw people out of their homes and into the community.
- **Our Safe Community.** Provide a safe environment for people of all ages, minimize threats to life and damage to structures, and increase awareness and be prepared for any emergency.
- **Our Active Community.** Add to and enhance City parks and open spaces to provide enriching recreational opportunities.
- **Our Creative Community.** Become a vibrant cultural center by weaving creative expressions into everyday life.

The nine chapters listed above, their guiding principles, and their contents (i.e., policies, actions), reflect the public visioning process while balancing State-mandated legislative requirements (including the 2021–2029 Housing Element Implementation Programs), the City's budget, and feasibility of future activities. Policies and actions that support each goal also provide guidance for the City's ongoing operations, daily actions, decision-making activities, maintenance activities,

regulation enforcement, monitoring, services provision, and other governmental activities, but will not lead to development activities by themselves.

The 2021–2029 Housing Element includes the following six overarching goals:

- **Goal 1.0–Conserve the Existing Housing Stock and Maintain Standards of Livability**: Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.
- **Goal 2.0–Encourage and Assist in the Provision of Affordable Housing**: Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.
- **Goal 3.0–Provide Opportunities to Increase Housing Production**: Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.
- **Goal 4.0–Compliance with State Housing Laws**: Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.
- **Goal 5.0–Promote Fair Housing While Acknowledging the Consequences of Past Discriminatory Housing Practices**: Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.
- **Goal 6.0–Expand and strengthen tenant protections for South Pasadena's existing renters**: South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.

Each of these goals has supporting policies that guide decision-making. Several programs are identified to support the goals and policies, with an eight-year objective, funding source(s), responsible agency(ies), and timeframe presented for each program.

Project goals, policies, and actions from the General Plan and DTSP Update, and the goals and policies from the 2021–2029 Housing Element applicable to each environmental topic are provided for the topical analysis in Sections 3.1 through 3.16 of this PEIR.

2.4.4 2021–2029 HOUSING ELEMENT

South Pasadena remains a highly desirable place to live and includes a community with a strong interest to preserve its historic neighborhoods. The continuing high cost of housing in South Pasadena amplifies the need for providing affordable housing at all income levels. The provision of adequate affordable housing continues to be a high priority for South Pasadena. The 2021-2029 housing element cycle (6th Cycle) for the Southern California region departs significantly from past housing element cycles due to significant changes in State law. State requirements are intended to boost housing production and provide more affordable housing units and justification for such new additions.

The Housing Element is required to include an assessment of housing needs of all economic segments of the community and an implementation program formulated to meet those needs. Local governments should consider economic, environmental, and fiscal factors as well as community goals in preparing a Housing Element and should cooperate with other local governments and the State in addressing regional housing needs. Housing Elements are also required to address the local government's "fair share of regional housing need" as reflected in the RHNA and as determined by the local Metropolitan Planning Organization (MPO). The MPO for the Southern California region, including South Pasadena, is the Southern California Association of Governments (SCAG). For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units, almost 33 times than the last cycle. A local government's identified RHNA includes both the existing and projected housing needs of the locality. Additionally, HCD has recommended the 2021–2029 Housing Element to demonstrate capacity for an approximately 34 percent surplus of units beyond the RHNA allocation. Table 2-2, 2021–2029 Housing Element RHNA Allocation, summarizes the 6th Cycle RHNA allocation for the City of South Pasadena that the Project accommodates. It should be noted that the total DUs in the Housing Element include 38 DUs approved since June 30, 2021. However, for purposes of this PEIR, a total of 2,775 new DUs are analyzed as being developed.

TABLE 2-2
2021–2029 HOUSING ELEMENT RHNA ALLOCATION

Income Group	Number of New Units Allocated to City[a]	Percentage	RHNA Surplus[b]
Extremely Low and Very Low Income	757	37%	177
Low Income	398	19%	
Moderate Income	334	16%	144
Above Moderate Income	578	28%	316
Total	**2,067**	**100%**	**708**
Total Dwelling Units	***2,775***		
Sources: [a] SCAG 2021; [b] South Pasadena 2023.			

As part of the proposed 2021-2029 Housing Element, the City must demonstrate to the State that there is available capacity within its jurisdictional boundaries to meet its targeted RHNA number. Per State requirements, the City's proposed Housing Element update includes the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics.
- An analysis of the barriers to producing and preserving housing.

- A review of the City's progress in implementing current housing policies and programs.
- An identification of goals, policies, and actions in addition to a full list of programs that will implement the vision of the Housing Element.
- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

Through the public visioning process that began in 2017, the community has identified the character, intensity, and scale of infill development desired for vacant and underutilized tracts in selected areas. Specifically, the community envisions new development to be respectful of the place and its historic resources; contribute to the vibrancy of the human experience; and have positive impacts on place-making, health, economy, and the environment. Therefore, based on this community input, a market study prepared as part of the General Plan and DTSP Update process, State requirements, and HCD feedback, the central strategy of the both the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project continues to be preservation of existing housing stock and directing calibrated growth.

Preserving housing supports sustainability objectives, and it is also less expensive to create affordable units in existing housing stock. However, to accommodate the 6th Cycle RHNA allocation and surplus, the City must determine policies and zoning thresholds that allow and encourage production of new housing units in a manner that South Pasadena has not contemplated in the past. The multi-pronged strategy that the Housing Element Implementation Programs rely on includes inclusionary housing requirements that the City Council adopted in 2020; encouraging Accessory Dwelling Units (ADUs) with simpler, objective requirements; and rezoning for higher density and mixed-use commercial/residential development. The rezoning of non-residential parcels to allow densities that support and encourage both market rate and affordable housing units would follow the adoption of a revised General Plan Land Use Element together with the DTSP, the latter an update and expansion of the 1996 Mission Street Specific Plan.

The Housing Element Implementation Programs encourage most new housing to be provided in walkable mixed-use environments in the Downtown and along major transit corridors and arterial roadways but also accommodates increased housing opportunities within existing residential neighborhoods. The Housing Element Implementation Programs balance strategic and targeted potential housing sites adequate to meet the RHNA allocation with the existing pattern of the land uses outside of the focus areas. It also introduces new policies and programs consistent with State law, including Affirmatively Furthering Fair Housing (AFFH) and Missing Middle concerns, based on a comprehensive and inclusive strategy to encourage housing production and retention to serve the entire community.

Because of the unusually high RHNA allocation plus recommended surplus, built-out condition of the City, small size of the City, rapidly evolving legislative landscape, and controversy regarding the Suitable Sites Inventory, it has been arduous for the City to prepare a Housing Element that HCD finds in compliance with State law and implement required zoning modifications within the statutory time limits. Nonetheless, as noted previously, HCD determined that the City's Housing Element (dated May 5) met the statutory requirements of State Housing Element Law. The 2021-2029 Housing Element Implementation Programs provide a framework for meeting the housing goals of the City and serves as an informational document for current and prospective residents of the community, businesses, and developers.

Program Implementation

The following summarizes the 2021–2029 Housing Element Implementation Programs that must be approved by September 27, 2023, (i.e., 120 days from the Housing Element adoption by City Council on May 30, 2023) pursuant to the Settlement Agreement.

Program 2.e – Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Proposed projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The SPMC complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in State law.

Program 2.h – Incentivize Special-Needs Housing

The City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.

Program 2.m – Update Inclusionary Housing Regulations

In order to broaden the feasibility for projects to include on-site inclusionary housing, the City will revise the Zoning Ordinance to reduce the required percentage of inclusionary units from 20 percent of base units to 15 percent of base units. Additionally, an exemption to the Ordinance will be included for projects with less than 10 units.

Program 2.n – Citywide Height Limit Ballot Initiative

As discussed further below, consistent with requirements under State law concerning cities placing measures on the ballot, the City will seek through voter approval in a local election, the repeal of the current height limit of 45 feet as to at least any residential or mixed-use (including residential) project on which the Housing Element anticipates a base density in excess of 50 per acre (DUs/acre). Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely or be replaced by a new height limit localized in the areas of increased density to stated density goals. If the height limit is replaced, the new limit will be no less than 84 feet to achieve the densities identified in the DTSP.

Program 3.a – Rezone and Redesignate Sites to Meet RHNA

Th City will re-designate and rezone the parcels listed in Table VI-50 and Appendix A within the 6th Cycle (2021–2029) Housing Element to address the shortfall of suitably-zoned sites for the lower-income RHNA. As part of this rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Density Residential zone to at least 30 DUs/acre and to at least 45 DUs/acre within the High Density Residential zone. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval

of projects that have at least 15 percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Additional zoning capacity will be achieved along the City's arterial corridors either through inclusion within the DTSP or through a zoning overlay district. Allowable densities within these areas will be 70 DUs/acre, except for the Fair Oaks zone within the DTSP, which will be 110 DUs/acre. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements, and findings for design review.

Program 3.b – Mixed-Use Developments and Adaptive Re-Use

As part of the rezoning and adoption of the DTSP through Program 3.a, the City will create development standards that encourage the development of high density residential uses. It is anticipated that the base density of the DTSP zones will be either 70 or 110 DUs/acre, depending on the zone.

Program 3.n – Zoning Changes

This program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the General Plan and DTSP Update. In addition, comparable Zoning Code revisions outside of the DTSP area will further implement this program. The types of standards and processes that will be revised to reduce the constraints on development including, but not limited to, height limits, open space standards, and parking requirements. Additionally, subjective approval findings will be removed in compliance with State law to facilitate administrative approval of residential developments.

Program 5.b – Encourage a Variety of Housing Types

Review and revise the City's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include Residential Estate, Residential Single-Family, Residential Medium Density, and Residential High Density. These types of facilities are still subject to State licensing requirements, when a license is a requirement for the residential care facility.

Height Limits

As discussed above, in August 2022, a Court Order was entered on the lawsuit brought against the City regarding the Housing Element that requires certain actions by the City within certain time periods to bring the Housing Element into compliance with Section 65754 of the Government Code. One of these required actions is to seek, through voter approval by December 31, 2024, the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs/acre. If an initiative is not

adopted by that deadline, the Court Order requires the City to complete a mid-cycle revision of the 2021-2029 Housing Element Implementation Programs to reduce all sites with a base density in excess of 50 DUs/acre to an assumed maximum density of 50 DUs/acre within nine months.

Because the 45-foot height limit was imposed by a 1983 voter initiative, a program to develop and place a measure on the ballot before December 31, 2024, is included as a program in the 2021-2029 Housing Element Implementation Programs. Accordingly, the potential for projects with buildings greater than 45 feet in height is addressed as a potential impact in this PEIR.

Additionally, the State's Density Bonus Law provides an avenue for development projects meeting specific requirements related to affordable housing to supersede a local height limit to meet the maximum density limits implemented by the Project. The State's Density Bonus Law and related housing legislation is discussed further in Section 3.10, Land Use and Planning, and Section 3.12, Population and Housing, of this PEIR.

2.4.5 GENERAL PLAN AND DTSP UPDATE

As discussed for the 2021–2029 Housing Element Implementation Programs above, considering both community feedback and State and regional requirements, the central strategy of the Project is to preserve and enhance the distinctive neighborhoods and strategically direct calibrated residential and non-residential growth to focus areas while providing an enhanced variety of housing opportunities outside these focus areas. The following five focus areas were identified:

- Downtown Specific Plan,
- Ostrich Farm,
- Huntington Drive & Garfield Avenue,
- Huntington Drive & Fletcher Avenue, and
- Huntington Drive & Fremont Avenue.

The focus areas are discussed in greater detail below. In addition, the Project introduces an affordable housing overlay district to allow projects with affordable housing that would be distributed across the city on appropriate sites.

The community wants new development to be respectful of the place; contribute to the vibrancy of the human experience; and have positive impacts on place-making, health, economy, and the environment. The General Plan and DTSP Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City through the year 2040. As part of this effort, the City's existing General Plan has been reorganized and reformatted to reflect both current State regulations and the community's vision for the City.

It is noted that buildout of a city under an adopted general plan is not tied to a specific timeline. For the purposes of this PEIR, development of the proposed growth identified in the General Plan is assumed to occur by the horizon year of 2040. However, if the Project were approved and the PEIR certified in Fall 2023, the General Plan and DTSP Update would span a period of approximately 17 years. It is noted there would be a separate environmental review process when the next housing element update is prepared.

The General Plan and DTSP Update would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. Individual projects would continue to be subject to the City's development review process and the CEQA process, as applicable. Therefore, this PEIR considers the impacts associated with the reasonably foreseeable direct and indirect physical changes in the environment that could occur due to land use and infrastructure development, and from the resultant population and employment growth in the City, due to buildout as projected in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

General Plan Update Chapters

As discussed above, there are nine chapters comprising the General Plan Update and these are each summarized below. The goals, policies, and actions from the General Plan Update applicable to each environmental topic are provided for each topical analysis in Sections 3.1 through 3.16 of this PEIR. The following summarizes what each chapter addresses, and the related issues examined.

Our Natural Community

This chapter addresses how the City can thrive in balance with the community's natural ecosystems. The chapter's overarching goal is that "South Pasadena will promote clean air, clean water, and habitat for native species; prevent urban heat islands; reduce stormwater runoff; promote a greener downtown; a healthier lifestyle; and nature based-recreation". Issues examined in this chapter include green infrastructure, air quality, water resources, and trees.

The General Plan identifies the need and potential to develop an integrated and connected Green Infrastructure system throughout the City. Green infrastructure refers to a network of green spaces that protects natural ecosystems, and provides associated benefits for people, wildlife, and the economy. Green infrastructure is contrasted with traditional "gray" infrastructure, which is a disconnected series of drainage channels, detention areas, streets, and utility corridors that are designed, operated, and maintained separately. A green infrastructure system includes core areas and connecting corridors. For the City, the core areas would include all open spaces, such as the Arroyo Seco watershed, parks, and other natural areas. The green corridors that include the watershed area, streets, alleys, and utility easements could maintain connectivity and provide for human and animal movement, and seed and pollen dispersal between and among the core areas and corridors. In some cases, the corridors extend beyond city limits and require collaboration with neighboring jurisdictions.

Our Prosperous Community

This chapter provides a roadmap to guide the City's decision-making on local economic policies and programs. The chapter's overarching goal is to "Attract and retain high value, high-wage jobs within the creative sector, diversify the local economy, promote and support local businesses, and build the City's fiscal capacity to create and sustain public amenities and services, while maintaining South Pasadena's small-town character and quality of life."

The chapter is organized in three sections: (1) market context, (2) fiscal context, and (3) planning implications. The first section provides a summary of the City's market positioning based on the findings of the market study. The second section provides a discussion of the City's recent revenues and expenses, a discussion of the fiscal context of City finances and obligations, and presents opportunities and strategies for the City to improve its fiscal position. The third section lays out the planning implications that must be considered when devising an economic

development strategy. While there is relatively strong demand for residential, office, and retail uses within South Pasadena, the actual amount and scale of development that can occur is limited by the amount of available land, financial feasibility of new development, fiscal priorities, and the level of acceptable density aligned with community character and vision.

Our Well Planned Community

This chapter addresses the anticipated distribution, intensity, and character of both existing and future land uses and development; and includes sections on urban form, planning designations, housing, the hillside area, and infrastructure. . At the same time, this chapter focuses on creating an economically healthy downtown; expanding housing opportunities; providing safe, comfortable, and walkable streets; leveraging transit; managing parking; interconnecting open space; animating the public realm; designing contextual buildings; and investing in arts and culture. The chapter's overarching goal is to "Preserve and enhance the distinctive residential neighborhoods; provide housing opportunities for all; reinvest in downtown corridors and neighborhood centers; and ensure that new development contributes its fair share towards the provision of affordable housing, adequate parks, schools, and other public facilities". The 2021-2029 Housing Element Implementation Programs is available under a separate cover from the General Plan and DTSP Update and is incorporated by reference in these documents. However, the general approach to preserving, enhancing, and expanding the City's housing stock consistent with the Housing Element is outlined in this chapter.

Exhibit 2-2, Existing Land Use Map, above, depicts the existing general distribution and general location and extent of the categories of public and private uses of land; and Exhibit 2-4, Proposed Land Use Map, depicts the sites, or parcels, proposed to accommodate the proposed residential and non-residential land uses. The allocation of separate land use designations evolves to a geography of places that address "form and character" of the place. The General Plan Update informs the nature of intended change in different areas. As shown in Exhibit 2-5, Proposed Focus Areas, areas where redevelopment is likely to occur are programmed for regeneration (i.e., focus areas). The focus areas are discussed further below. This approach focuses policy, regulation, and the techniques used to implement the community vision to areas of change. However, the General Plan Update goals, policies, and actions would apply to all proposed development in the City, not just the focus areas. The General Plan Update land use map sets forth an approximate 20-year vision to preserve the character and quality of existing neighborhoods while providing enhanced housing opportunities and leveraging development close to services, jobs, and conveniences. The land use designations of areas where no changes in land use are expected reflect the existing land use type and development density or intensity.

Our Accessible Community

This chapter addresses transportation choices advocated by Senate Bill 375 and Assembly Bill 1358 by strengthening and balancing pedestrian, bike, and transit connections throughout the City and surrounding region. The chapter's overarching goal is that "South Pasadena's transportation networks should be designed and managed to support not just mobility and access but broader community goals of safety, health, economic development and environmental sustainability". The primary issues examined in this chapter include complete streets, mobility, transit, parking, street classification, bicycle facilities, and adaptability.

As required under the City's adopted Complete Streets Policy, the General Plan Update indicates that streets should safely accommodate all users. To the extent practically feasible, streets should be designed to encourage active transportation uses, including walking and biking, while

discouraging unsafe vehicle speeds. Existing and potential transit and truck routes should be designated to safely accommodate large vehicles. Mobility should be optimized by making intersections and interchanges more efficient and by providing alternatives to driving such as enhanced public transportation. This would include pursuing opportunities to improve multimodal access to the Metro A Line station. To support mobility and economic development, the General Plan Update indicates the City should seek to ensure availability of public parking for residents and visitors within the context of safety and other needs. However, before providing additional parking supply, the City should first seek to more efficiently manage demand for its existing supply, then to partner with private entities to provide additional supply that is accessible to members of the general public.

Our Resilient Community

The chapter addresses the City's ability to bounce back and thrive when faced with adversity. The chapter's overarching goal is to "Build a resilient city that is able to anticipate, plan for, and mitigate the risks, and seize the economic, environmental, and social opportunities it needs to bounce forward from a disaster". The chapter's approach considers the resiliency challenges in the other eight chapters, and seeks to bridge the practice gaps between these chapters by developing relationships and partnerships through which more comprehensive solutions can be developed.

Our Healthy Community

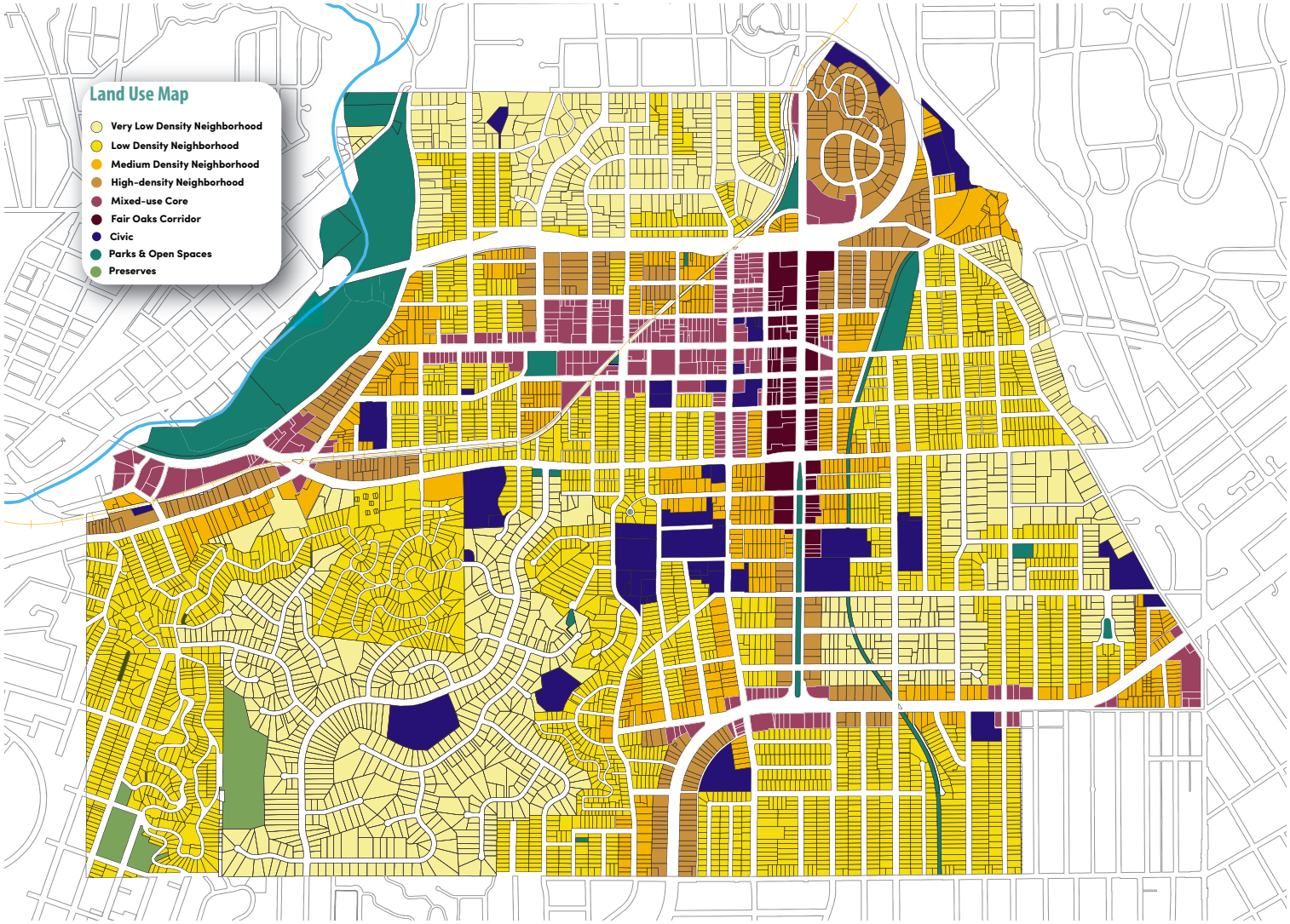
The chapter seeks to build effective partnerships that improve physical and mental health and social well-being. The chapter's overarching goal is to "Make South Pasadena a healthy and safe place where everyone feels they can be active in family, community, and neighborhood life; where they help each other, contribute to the vitality of the City, and create a sense of belonging among all residents; and have access to nutritious food". Areas considered in this chapter include active living, mental well-being, noise, and access to nutritious and affordable food. Streets and land use patterns that promote walking, a network of complete streets, access to nature, clean water and air, and healthy food can directly improve health and indirectly influence behavioral choices. Health also makes an important contribution to economic progress, as people live longer, are more productive, and save more.

Our Safe Community

This chapter addresses natural and human-caused threats and hazards. The chapter's overarching goal is to "Increase awareness and be prepared for emergency, and minimize threat to life and damage to structures from natural and human-caused hazards". Areas considered in this chapter include police and fire services; and hazards including wildfire, emergency service and evacuation access, earthquakes, and inundation from dam failure.

Our Active Community

This chapter addresses parks and open spaces to provide enriching recreational options for the entire community. The chapter's overarching goal is to "Create environments that incorporate physical activity into daily activity to support wellness, social connections, and provide children and adults with a range of high-quality recreation opportunities". Physical activity can include everyday activity at home, school, or work; active travel, which is walking or cycling to travel; and active recreation. The focus of this chapter is on how spatial design and programming can enhance the City's active recreation opportunities. Areas considered in this chapter include benefits of open space, parks and open space profile, standards, community needs, and issues.



Source: City of South Pasadena 2013023

Proposed Land Use Map

Exhibit 2-4

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

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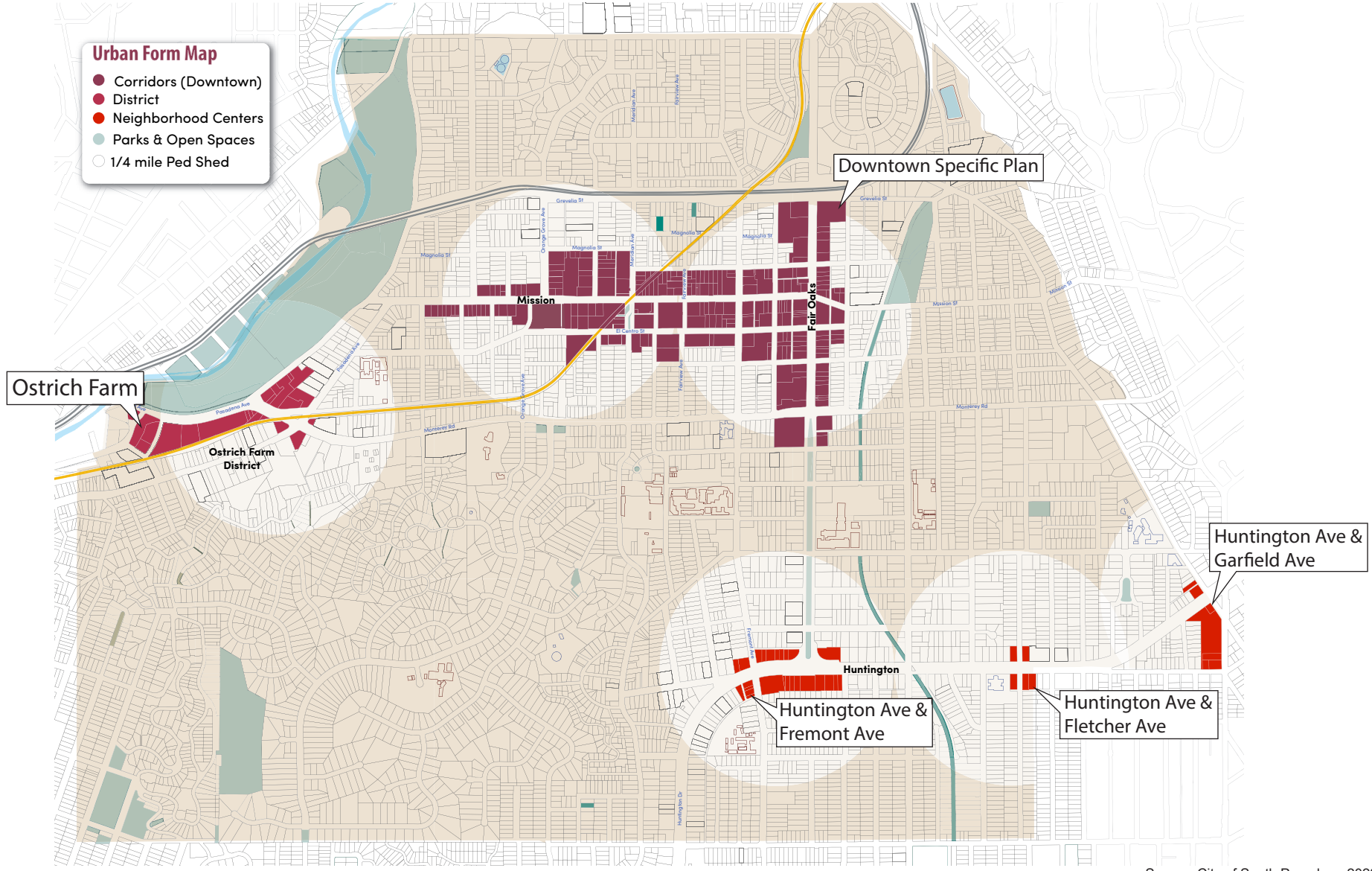

Source: City of South Pasadena 2023

Proposed Focus Areas

Exhibit 2-5

South Pasadena General Plan and Downtown Specific Plan Update & 2021-2029 Housing Element

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Our Creative Community

This chapter addresses weaving arts, cultural events, and community programs into everyday life. The chapter's overarching goal is "To nurture and promote South Pasadena arts and cultural activities, organizations and events and to give them more visibility and prominence in the region". This chapter lays out a roadmap to leverage the City's collective resources to elevate South Pasadena's profile as a creative, innovative community and to strengthen and expand its cultural ecosystem. Areas considered in this chapter include creative prosperity, cultural tourism, education for creativity, cultural equity, public art, historic preservation, and capacity and leadership.

Project Development Capacity and Pattern

As discussed, the central strategy of the Project is to preserve and enhance the distinctive neighborhoods and direct calibrated growth to focus areas while providing enhanced housing opportunities beyond the focus areas. The Project encourages the majority of growth to be provided in walkable mixed-use environments in the downtown and along major transit corridors and arterial roadways, while accommodating increased housing opportunities within existing residential neighborhoods. Table 2-3, City of South Pasadena Development Capacity (2040), on the following page, summarizes the development capacity of the five focus areas, potential housing sites outside the focus areas, and maximum growth being analyzed in this PEIR. These focus areas include: the Fair Oaks Avenue and Mission Street corridors in the downtown area (i.e., DTSP), the Ostrich Farm District, and three Neighborhood Centers on Huntington Drive. Exhibit 2-5 above depicts the names and boundaries of the five focus areas. It is noted the acreage of each focus area does not include the public right-of-way (e.g., streets, alleys, sidewalks) and reflects only the parcels within each area.

As shown in Table 2-3 and Exhibit 2-5, the proposed focus areas for development are limited in both amount and geographic extent, encompassing approximately 107 acres (4.9 percent) of the 2,272-acre City. The Project analyzed herein would accommodate a maximum of 2,775 DUs (i.e., the 6th Cycle RHNA allocation and HCD-recommended surplus) and 430,000 sf of non-residential uses, comprised of retail and office development, in addition to existing land uses. This represents the buildout condition that is the basis of all analyses in this PEIR. However, while this PEIR assumes all potential growth and development would occur in addition to existing uses, as the most conservative assumption, in reality a proportion of future development will necessarily be replacement and/or intensification of existing uses due to the built-out condition of the City. Table 2-4, Summary of Existing and Projected Demographics, presents the existing and buildout residential, non-residential, and population figures.

TABLE 2-3
CITY OF SOUTH PASADENA DEVELOPMENT CAPACITY (2040)

	Size (acres)	Residential (DUs)	Non-Residential (sf)	
			Commercial	Office
Focus Areas				
Corridors (within the Downtown Specific Plan Area)				
Fair Oaks Avenue	80.0	880	75,000	100,000
Mission Street		350	25,000	25,000
Districts				
Ostrich Farm	13.4	490	5,000	100,000
Neighborhood Centers				
Huntington Drive & Garfield Avenue	4.5	140	10,000	50,000
Huntington Drive & Fletcher Avenue	1.6	0	5,000	0
Huntington Drive & Fremont Avenue	7.4	60	10,000	25,000
Neighborhoods (Throughout Remainder of the City)				
High Density		455	0	0
Medium Density		350	0	0
Low Density		40	0	0
Very Low Density		10		
Totals		**2,775**	**130,000**	**300,000**
			430,000	

DU: dwelling units; sf: square feet; N/A: not available

Source: South Pasadena 2023a.

TABLE 2-4
SUMMARY OF EXISTING AND PROJECTED DEMOGRAPHICS

	Size (acres)	Residential (DU)	Non-Residential (sf)		Population
			Commercial	Office	
Existing Citywide Totals	2,272	11,156[a]	866,000[b]	390,000[b]	25,580[a]
Proposed Citywide Totals	2,272	13,931	996,000	690,000	32,462
Difference	–	**2,775 (25%)**	**130,000 (15%)**	**300,000 (77%)**	**6,882 (27%)**

DU: dwelling units; sf: square feet; N/A: not available

Note: The estimated population increase in this table assumes full occupancy of 2,775 DUs at the average household size of 2.48 based on 2022 California Department of Finance demographic data.

Sources:
[a] DOF 2022
[b] HR&A 2017

The buildout of up to 2,775 DUs and 430,000 sf of retail/office is estimated to generate up to 1,978 additional jobs[3] and 6,882 more residents[4] in the City through 2040 compared to existing conditions. The maximum of 6,882 residents equates with full occupancy of 2,775 units; however, the City had a vacancy rate of 5.5 percent in both 2017 and 2018, and the County's vacancy rate was 6.3 percent in 2017 and 6.4 percent in 2018 (DOF 2021). Vacancy rates of 5.5 percent for the City and 6.4 for the County are applied in this analysis as they are the most recent prior to the COVID-19 pandemic and are expected to be more reflective of typical conditions over the longer-term planning periods of the Project. Based on this vacancy rate (5.5 percent), the maximum 2,775 DUs in the 2021–2029 Housing Element Implementation Programs would result in a resident population increase of approximately 6,503 persons occupying 2,622 DUs (i.e., households). Also, this approach likely overestimates the total population increase even with a reasonable vacancy rate because some of the new dwelling units would replace dwelling units removed as part of a redevelopment project. Additionally, the Project would be expected to develop mainly multi-family residential at varying densities, and the average household size for these types of units is less than the average for the City. This is because this figure represents a housing stock almost evenly split between single-family and multi-family. This conservative approach to potential growth would ensure all potential environmental impacts were captured in this PEIR.

The maximum 2,775 DUs would represent an approximate 25 percent increase–or about 1.25 percent per year–in the City's households. In terms of population, the increase would be about 6,503 persons or a 25 percent increase–or about 1.25 percent per year. If all potential homes were occupied, the City's population would increase to approximately 32,462 persons (6,882 additional persons). However, no municipality experiences full occupancy of all housing units.

The maximum 430,000 sf of non-residential uses represent an approximate 34.2 percent increase–or about 1.7 percent per year–in the City's commercial and office space and would generate an approximate 14.4 percent increase–or about 0.7 percent per year–in the number of jobs within the City. The annual increase rates are based on 20 years and assume maximum buildout of all development capacity in the City by 2040.

The majority of existing land uses in the City are not expected to change, and new development is anticipated to occur largely as infill redevelopment or development in the strategic focus growth areas, described below.

Development Focus Areas

The City of South Pasadena contains historic residential neighborhoods with mostly tree-lined streets. The existing housing stock is almost evenly divided between multi-family and single-family residences. Mission Street is the heart of South Pasadena's downtown with a consistent frontage of low-scale historic buildings as well as retail spaces and cultural institutions within a walkable environment. Metro's A Line Station has sparked renewed interest in for-sale and rental housing in the downtown area. However, as a built-out community with strong leaning towards conservation, finding opportunities for new housing requires new and creative strategies to address limited land resources.

The following describes the five focus areas in more detail. The level of anticipated change in the focus areas ranges from reinvestment in existing buildings and minor improvements to utility

[3] Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).
[4] Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

infrastructure and the public realm, to the potential for major infill development through rezoning to increase base density and achieve higher levels of affordable housing through the State density bonus and inclusionary housing incentive programs. In some instances, addition of new streets may be necessary to break up the large-scale super-blocks into pedestrian-oriented blocks, or complete a block with missing buildings, open space, or infrastructure.

1. Corridors (Downtown Specific Plan)

Corridors, which can be natural or urban, often form boundaries and connections between neighborhoods and/or districts. Natural corridors can be in the form of drainage channels or green parkways. Urban corridors can be transportation thoroughfares that frequently encompass major access routes, especially ones with commercial destinations, including transit routes.

Mission Street is the City's historic main street and contains some of its most important buildings, including the City's civic center. Fair Oaks Avenue is a major north-south arterial through the City. Over the past few decades, even though Fair Oaks Avenue has remained economically viable, it has seen a decline in quality due to the sprawl of buildings and lack of landscaping. Mission Street by contrast has retained its historic character, particularly around the Metro A Line Station, and new infill along with successful retail businesses have made it one of the most important destinations in the City. The Mission Street and Fair Oaks Avenue corridors in the Downtown area offers opportunities for housing for people across the income spectrum, jobs, arts and culture, local serving retail, and gathering places for residents and visitors.

The DTSP Update, which is depicted in the central portion of the City in Exhibit 2-6, is a companion document to the General Plan Update, with the intention of building on the success of the earlier (1996) plan and expanding the covered area to include a segment of Fair Oaks Avenue. Fair Oaks Avenue is a highly visible corridor with historic assets, and it was concluded that there are many opportunities for strategic growth that complements the Mission Street corridor. Exhibit 2-8, Downtown Specific Plan Existing Land Uses, illustrates the existing land use plan for the DTSP area.

The DTSP Update includes policies and strategies to preserve historic assets, encourage contextual infill development of vacant and underutilized parcels, create jobs, and maintain and support existing compatible businesses and industry, and accommodate housing for a variety of income levels. The DTSP also fulfills the goals, policies, and actions of South Pasadena General Plan by promoting orderly growth, and efficiently utilizing existing infrastructure and services. The DTSP Update is intended to provide a vision for the future that integrates housing that complements the historic fabric, while providing predictability for office, and retail development along with the new residential uses. The DTSP identifies a series of distinct planning strategies– public and private– to guide the social and economic future of the area anchored by Fair Oaks Avenue and Mission Street.

Downtown Specific Plan Code

The DTSP Update has an accompanying hybrid form-based code (herein referred to as DTSP Code or Code) to guide the DTSP's implementation, providing all requirements for development and land use activity with the DTSP's boundaries. Form-based codes are an alternative to conventional zoning regulations and are purposeful place-based regulations with an increased focus on the design of the public realm–the public space defined by the exterior of buildings and the surrounding streets and open space. This Code reinforces the historical form patterns in Downtown South Pasadena with the use of street, frontage, building, and open space typologies

that are appropriate for its context. The Code also establishes a regulating plan, shown on Exhibit 2-9, Regulating Plan for the Downtown Specific Plan. In short, the Code is the implementing tool of the DTSP Update, whose environmental impacts are analyzed in this PEIR.

Building Type is a classification system resulting from the process of creation, selection, and transformation of a few basic character defining features of a building. When repeated, these features produce a predictable result. Building types encourage a diverse stock of buildings that can gracefully accommodate a higher intensity of development in a contextual manner and produce great places. The City's inclusionary ordinance will ensure that affordable housing options are included in these diverse building types to offer a variety of options for all incomes and ages. Human-scaled building types, when consistently aligned with similar or compatible building types, also create a harmonious and pedestrian-friendly streetscape.

Frontage Type standards are applicable to the development of private frontages of buildings that provide the important transition and interface between the public realm (street and sidewalk) and the private realm (yard or building). These standards are intended to ensure a development that reinforces the highly desirable existing character and scale of South Pasadena's downtown.

Street and Open Space Types provide standards for a wide range of context-sensitive public areas to implement the DTSP's placemaking vision through Public Works projects and private development. As shown in Table 1: Land Use Table of the Code, while there are permitted uses, most uses require a discretionary permit (e.g., conditional use permit, administrative use permit, temporary use permit). The Code's Table 1 also indicates when uses listed are not permitted and states that uses not listed in Table 1 are prohibited. Arcades, galleries, balconies, cornices, and awnings, if approved for a given use, may aerially project from private property over the public rights-of-way (ROW) in order to provide a shaded sidewalk and would be subject to an encroachment permit. Any ROW encroachments shall not impede required clearances under the Americans with Disabilities Act (ADA) and/or the maintenance of utilities. Furthermore, as discussed in Section 4 of the Code, each structure and land use shall be constructed, reconstructed, enlarged, altered, initiated, or replaced in compliance with the requirements of the Code. All City permits or other required approvals must be obtained before the issuance of any required grading, building, or other construction permit, and before the proposed structure is constructed and land use established or otherwise put in operation.

Catalytic Project Opportunities

The DTSP Update identifies phased catalytic opportunities to spur economic investment and residential and commercial development in the downtown area. Exhibit 2-10, Conceptual Buildout of Downtown Specific Plan, depicts an illustrative plan of the DTSP area considering the conceptual buildout of all potential catalytic projects considered in the DTSP Update. These are possible future projects that are consistent with the vision of the DTSP Update but are not proposed as specific actions as part of the General Plan and DTSP Update Project.

Possible future public improvement projects include:

- Fair Oaks & Mission Intersection Enhancement;
- Parklets on Mission Street;
- Mid-block crossings on Mission Street;
- Mission Street and Fair Oaks Avenue Mobility Enhancement;
- Metro A Line Station Area Enhancement; and

- Pico Alley and Edison Lane Enhancement.

Possible future public improvement projects with private collaboration include:

- Parking structure adjacent to the SR 110; and
- Parking garages as part of infill projects.

Possible future private improvement projects with municipal collaboration include:

- Mixed-use infill projects along Fair Oaks Avenue and Mission Street;
- Mixed-use infill project with a central parking plaza on the South Pasadena Unified School District site along Mission Street; and
- Plaza at the corner of Fair Oaks Avenue and Mission Street.

2. Ostrich Farm District

The approximate 13.4-acre Ostrich Farm district is the western gateway to the City. Once the home of Cawston's Ostrich Farm, a provider of ostrich feathers and tourist attraction from 1896 to 1935, the site was later developed as a group of creative office suites buildings and live/work lofts. Creative office suites in the Ostrich Farm area are typically occupied by tenants who require large floor areas such as entertainment and design firms. These office suites range from shared spaces to large private offices, and are desirable to boutique businesses, design firms, and small entertainment companies. Demand for this type of space has somewhat reduced due to the impact of the COVID-19 pandemic, and higher density housing is being examined as a desirable use.

The vacant and underutilized parcels in the Ostrich Farm district represent South Pasadena's greatest opportunity for either more creative office suite development or significant amounts of new housing or a mixture of both. Creative office development of live-work uses could also support and enhance South Pasadena's creative community.

The sites in the Ostrich Farm district with adjacency to residential neighborhoods may be appropriate for a mixed-use development with limited neighborhood-serving retail and transitional residential use. All other sites in the district should be developed to support a self-sustaining mixed-use neighborhood. Better linkage to the Metro A Line Station would provide Ostrich Farm employees access to reliable transit. A Citywide public or private circulator shuttle service as part of a transportation demand management program could be evaluated as a potential way to link Ostrich Farm to Downtown and Metro A Line Station. Adding sidewalks along the north side of Pasadena Avenue would encourage use of the Arroyo Seco Park and a consistent street tree canopy would create sense of enclosure, reduce the heat island effect, and absorb storm water and airborne pollutants.

3. Neighborhood Centers (Huntington Drive)

Neighborhood centers are places where people can meet at a local coffee shop, market, bookstore, diner, or even hardware store. South Pasadena's existing neighborhood centers along Huntington Drive could become such places. The General Plan Update identifies three neighborhood centers. These include, situated from east to west: Huntington Drive and Garfield Avenue, Huntington Drive and Fletcher Avenue, and Huntington Drive and Fremont Avenue.

Huntington Drive and Garfield Avenue

This approximate 4.5-acre neighborhood center is located at the crossroads of three major streets (Huntington Drive, Garfield Avenue, and Atlantic Boulevard) and shares boundaries with San Marino on the east and Alhambra on the south. Specifically, only the lands to the west of the intersection are within the City boundaries. The anchor supermarket and adjacent bank building on the south side of Huntington Avenue draw customers from neighboring cities, and the commercial corner on the north side backs up to an established one- and two-story residential neighborhood.

The current pattern of development lacks a distinctive walkable block, street, and open space framework. The area is primarily designed to be accessed by a car, with a large on-site parking area in front of the building. Future redevelopment could explore new building types and mixed uses that subdivide the large tract into walkable blocks. Furthermore, the street pattern, intersection design, and open space elements could be improved to create a monument or landmark feature to create a stronger sense of place and that could also serve to calm traffic flows. This intersection is served by multiple transit buses that run along Huntington Drive and Garfield Avenue. As such, the intersection could benefit from transit amenities such as wider sidewalks, street trees, bus shelter, benches, and lighting.

Huntington Drive and Fletcher Avenue

This approximate 1.6-acre Neighborhood Center is the smallest of the three. Also, notably, three of the four corners include historic buildings. This is a highly walkable center with two-story, mixed-use buildings that define the street's edge, and the shops open directly onto the wide sidewalk. The wide sidewalks can accommodate streetscape amenities like a consistent street tree canopy, places to sit, lighting, and bus shelters that would further enhance the pedestrian experience. With a modest amount of neighborhood-serving retail, limited new growth is anticipated at this location.

Huntington Drive and Fremont Avenue

This approximate 7.4-acre Neighborhood Center has a mix of one-, two-, and three-story office, retail, and residential buildings. These buildings are placed next to each other along the edge of a wide sidewalk, many with active storefronts that engage pedestrians, with the exception of one market. The parking lot for the market interrupts the walking experience along Huntington Drive. The market and surface parking lot could potentially be replaced, which would create a redevelopment opportunity for a two- to three-story mixed-use development with active neighborhood-serving retail or cafes at street level. Parking should be located away from the street's edge.

Streetscape and lighting improvements would greatly enhance the comfort and safety of the walking experience. Portions of the surrounding neighborhood lack access to a park within a 10-minute walk. The islands and turn lanes make crossing the intersection at Huntington Drive and Fair Oaks Avenue confusing. Fair Oaks Avenue could be examined for consolidating and repurposing as one large public open space, which could simplify the traffic flow and pedestrian crossing experience. Public views to the San Gabriel Mountains to the north should be protected by carefully massing setbacks at street corners that open up the vistas. If a protected bike lane along Fair Oaks Avenue in the downtown area is recommended based on further study, it could be extended south to Huntington Drive.

2.5 APPROACH TO CUMULATIVE IMPACT ANALYSIS

Section 15130 of the State CEQA Guidelines states that cumulative impacts shall be discussed in an EIR where identified environmental impacts are potentially "cumulatively considerable", which is defined in Section 15065(a)(3) as "significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects". Section 15130(b)(1) states that the cumulative impact discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone and should focus on the cumulative impact to which the identified other projects contribute.

Section 15130(b)(1) of the State CEQA Guidelines describes two allowable methods to determine the scope of projects considered in the cumulative impact analysis, as follows:

> (1) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
>
> (2) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

The cumulative impact analysis contained in this PEIR uses the second method, which focuses on regional projections, assuming future growth and development reflects these projections. The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs establish goals and policies to guide long-term (year 2040) development within the City. Similarly, SCAG's growth projections (population, housing, and employment), prepared as part of the RTP/SCS, provide estimates of long-term development within the region where the City is located. The RTP/SCS also provides goals and direction for regional development patterns. The current RTP/SCS was adopted by SCAG in 2020 (2020–2045 RTP/SCS).

The cumulative impact analysis in this PEIR considers the environmental impacts of the development associated with the proposed Project in combination with the potential environmental impacts of regional growth in the San Gabriel Valley through the year 2040. In compliance with Section 15130(b)(1)(B) of the State CEQA Guidelines, this approach provides for the consideration of the combined effect of similar impacts (e.g., growth-focused, long-term, and program-level for the San Gabriel Valley) based on regional projections within the same time frame as buildout of the City (through the year 2040) that could be cumulatively considerable, when evaluated with the impacts of the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. Each environmental topic in Section 3.0 of this PEIR provides a "cumulative impacts" subsection that includes the topic-specific cumulative impact analysis.

As noted above, the geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley. The six-county SCAG region is too large of a geographic area to effectively or reasonably assess the Project's cumulative impacts from the Project.

Section 15130(b)(3) of the State CEQA Guidelines states that "lead agencies shall define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used". Unless otherwise indicated in each topical analysis in Section 3.0, the geographic scope used in the cumulative analysis includes the San

Gabriel Valley, as discussed above. However, there are environmental topics whose relevant geographic scope for purposes of cumulative impact analysis may be larger or smaller than this area, and may be defined by local, regional, or State agency jurisdiction or by environmental factors. One example is the geographic scope of cumulative air quality impacts, defined by the SCAQMD to encompass the SoCAB. SoCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. This air basin is larger than the San Gabriel Valley and is noted in the analysis of cumulative air quality impacts. Conversely, the geographic scope of cumulative aesthetic impacts is limited to anticipated growth within immediately adjacent jurisdictions that share viewsheds or lines of sight with the City.

Finally, this PEIR considers regional programs directed at mitigating cumulative impacts of development, such as those instituted for urban runoff related to water quality impacts. Where there is a topic-specific geographic scope or an applicable regional program, these are discussed within the cumulative impact analysis of each environmental topic addressed.

2.6 PROJECT OBJECTIVES

Section 15124 of the State CEQA Guidelines requires an EIR to include a statement of the proposed project's objectives. This disclosure will assist in developing the range of project alternatives to be investigated in that EIR, as well as to provide a rationale for the adoption of a Statement of Overriding Considerations if one is needed.

The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs seek to achieve the following key objectives:

1. Provide sufficient capacity for housing development in compliance with State policy mandates. Address the shortage of housing for lower-income households and promote an inclusive residential environment that welcomes all people into the community.
2. Preserve natural areas, enhance parks and open spaces to provide enriching recreational opportunities and ensure access to those spaces for people of all ages and abilities.
3. Attract and retain high value, high-wage jobs within the creative sector, diversify the local economy, promote and support local businesses, increase local tax base to help fund vital public services.
4. Direct new growth to the downtown area along Mission Street and Fair Oaks Avenue, as well as opportunity sites such as the Ostrich Farm District, while ensuring the continued character of existing residential areas.
5. Develop clear and precise standards that offer predictable outcomes and processes.
6. Encourage pedestrian-oriented mixed-use development, while providing new and enhancing existing public spaces and gathering places, creating vibrant cultural hubs that weave creative expression into everyday life.
7. Provide safe access for all street users–pedestrians, cyclists, public transit users, and motorists–of all ages and abilities. Support an integrated multi-modal network and efficiently manage parking to support wider community goals.
8. Increase individual, institutional, and business capacity to survive and adapt to any chronic stress or acute shocks and be able to recover and thrive.
9. Create environments that encourage safe and healthy lifestyles and maximize the opportunities for physical activity. Design the public and semi-public realm to foster social

interaction and develop good programming to draw people out of their homes and into the community.

10. Create a vibrant cultural center by weaving creative expressions into everyday life.

2.7 SUBSEQUENT ACTIONS

The land use designations on the City's land use map (see Exhibit 2-2) define the basic categories of land use currently allowed in the City, which are implemented through the City's Zoning Ordinance and Zoning Map as part of the City's Municipal Code and contain more specific regulations and standards governing development on individual properties. As a result of the General Plan Update (inclusive of the DTSP Update and 2021–2029 Housing Element Implementation Programs), some portion of the City's Zoning Code would no longer be consistent with the goals and policies of the General Plan.

Under State law (Section 65860 of the *Government Code*), a property's zoning is required to be consistent with its General Plan land use designation. Specifically, Section 65860(c) of the Government Code requires that when a General Plan is amended in a way that makes the Zoning Code inconsistent with the General Plan, "the zoning ordinance shall be amended within a reasonable time so that it is consistent with the general plan as amended", but it does not define a specific time period that would constitute a reasonable time. The General Plan and DTSP Update and the necessary 2021–2029 Housing Element Implementation Programs have been prepared, and would be adopted, simultaneously. Refer to the header "Program Implementation" above for a summary of the 2021–2029 Housing Element Implementation Programs that must be approved by September 27, 2023, pursuant to the Settlement Agreement.

2.8 INTENDED USES OF THE EIR

2.8.1 CITY OF SOUTH PASADENA

The City of South Pasadena is expected to use the environmental information contained in this PEIR as part of consideration of approvals related to and involved in General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs implementation. The information in this PEIR is one facet of the multifaceted process of development project review and permitting by the City, because a CEQA document considers solely environmental impacts. Aspects of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs that do not directly or indirectly have an environmental effect are not germane to the CEQA process. Refer to Section 1.1, Purpose and Type of Environmental Impact Report, of this PEIR for further discussion of the role and use of a program-level CEQA document.

It is important to note that the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs do not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements at this time. New development would continue to be subject to the City's development review process.

Potential actions to be considered by the City, after implementation of the CEQA process, as applicable, may include, but not be limited to the following:

Primary Discretionary Actions

- Certification of the Final PEIR for the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs,

- Adoption of the General Plan and DTSP Update, and.
- Adoption of Zoning Code Updates reflecting the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs (specifically related to program 2.h, 2.j, 3.b, 3.n and 5.b).

Subsequent Discretionary and Ministerial Actions

In addition to the discretionary actions listed above, subsequent discretionary and ministerial actions by the City to implement the Project may include, but not be limited to:

- Adoption of amendments to the Municipal Code (including DTSP Code and Zoning Code) to achieve consistency with the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs;
- Approval of new or updated Specific Plans;
- Approval of tract maps and parcel maps;-
- Approval of development agreements;
- Approval and funding of public/capital improvement projects;
- Approval of variances, lot line adjustments, and conditional use permits;
- Issuance of demolition, grading, building and other permits necessary for public or private development projects; and/or
- Other entitlement action(s) required by the Municipal Code for development proposals.

2.8.2 RESPONSIBLE AND TRUSTEE AGENCIES

The PEIR provides environmental information to responsible and trustee agencies and other public agencies that may be required to grant approvals or coordinate with the City of South Pasadena as part of the implementation of the Project. These agencies may include, but are not limited to:

- California Department of Fish and Wildlife (CDFW);
- California Department of Transportation (Caltrans);
- California Department of Housing and Community Development (HCD);
- Los Angeles County Metropolitan Transportation Authority (Metro);
- Los Angeles Regional Water Quality Control Board (LARWQCB);
- Metropolitan Water District of Southern California (MWD);
- South Coast Air Quality Management District (SCAQMD);
- Southern California Association of Governments (SCAG); and/or
- U.S. Army Corps of Engineers (USACE).

Other permits may be needed from various public agencies depending on the potential to affect their respective facilities or in accordance with their regulatory functions.

2.9 REFERENCES

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SECTION 3.0 ENVIRONMENTAL ANALYSIS

This section analyzes the potential environmental impacts associated with approval and implementation of the General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project). While the revision/update of a policy document (such as the Project documents) does not directly lead to environmental impacts or changes to the environment, future development in the City, as regulated in part by the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, would lead to physical changes that could, in turn, potentially result in environmental impacts. Therefore, the environmental analyses within this section of the Program Environmental Impact Report (PEIR) focus on the potential environmental impacts of future development and redevelopment that would be allowed under the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs and associated subsequent actions to implement the Project.

Policies and actions in the various elements of the General Plan and DTSP Update as well as the 2021–2029 Housing Element Implementation Programs are intended to prevent the occurrence of, or reduce the significance of, potential environmental effects. Because policies and actions are incorporated into the Project planning documents and are, therefore, components of the Project, they do not constitute mitigation measures as defined under the California Environmental Quality Act (CEQA).

Section 15126.4(a) of the State CEQA Guidelines requires lead agencies to consider feasible mitigation measures (MMs) to avoid or substantially reduce a project's significant environmental impacts. MMs are required when a potentially significant environmental effect has been identified that cannot be reduced to a level considered less than significant through the implementation of the policies and actions, as well as any applicable regulations required separate from the CEQA process.

If determined necessary in the future during consideration of proposed programs or developments, the City may substitute, at its discretion, any mitigation measure (and timing thereof) that has (1) the same or superior result as the original mitigation measure and (2) the same or superior effect on the environment (Section 21080[f] of CEQA). The City of South Pasadena, in conjunction with any appropriate agencies or City departments, shall determine the adequacy of any proposed "environmental equivalent/timing" and, if determined necessary, may refer said determination to the Planning Commission and/or City Council.

In Sections 3.1 through 3.16, this PEIR addresses the Project's potential impacts on the following environmental topics:

- Aesthetics (Section 3.1),
- Air Quality (Section 3.2),
- Biological Resources (Section 3.3),
- Cultural and Tribal Cultural Resources (Section 3.4),
- Energy (Section 3.5),
- Geology and Soils (Section 3.6),
- Greenhouse Gas Emissions (Section 3.7),
- Hazards and Hazardous Materials (Section 3.8),

- Hydrology and Water Quality (Section 3.9),
- Land Use and Planning (Section 3.10),
- Noise (Section 3.11),
- Population and Housing (Section 3.12),
- Public Services and Recreation (Section 3.13),
- Transportation (Section 3.14),
- Utilities and Service Systems (Section 3.15), and
- Wildfire (Section 3.16).

As discussed in Section 1.0, Introduction, the City determined there would be no impacts to the following environmental topics: Agriculture and Forestry Resources and Mineral Resources. There are no agriculture, forestry, or mineral resources in the City.

3.0.1 ENVIRONMENTAL ANALYSIS FORMAT

To facilitate the analysis of each topic presented in Section 3.0, a standard format was developed. This format is presented below, with a brief discussion of the information included within each heading.

Methodology

This section describes the methods that were used in the process of analyzing impacts related to the implementation of the proposed Project in relation to that environmental topic.

Existing Conditions

This section describes the existing environmental conditions related to each topic analyzed. In accordance with Section 15125 of the State CEQA Guidelines, the existing local and regional setting is discussed as they existed when the Recirculated Notice of Preparation was distributed for public review in April 2021, unless otherwise noted. This section provides the baseline conditions with which environmental changes associated with the Project have been compared and analyzed relevant to that environmental topic.

Relevant Programs and Regulations

This section includes a summary of the existing federal, State, regional, County, and local laws, regulations, and ordinances that directly relate to the environmental topic being analyzed. These are summarized to provide background information and to establish the current regulatory setting under which future development would occur. Some of these are regulations that serve to reduce or avoid a potential impact that would otherwise occur; these will be noted in the analysis. It is noted that the regulatory setting changes over time, and different or additional regulations may be in place when individual future projects are developed in the City.

Thresholds of Significance

Section 15126.2 of the State CEQA Guidelines requires an Environmental Impact Report to "identify and focus on the significant environmental effects of the proposed project". "Effects" and "impacts" mean the same under CEQA and are used interchangeably in this PEIR. A "significant

effect" or "significant impact" on the environment is "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (Section 15382 of the State CEQA Guidelines).

In determining whether an impact is "significant", Section 15064.7 of the State CEQA Guidelines encourages each public agency to develop and publish thresholds of significance to use in determining the significance of an environmental impact. These thresholds may consist of identifiable quantitative, qualitative, or performance-level criteria used to determine non-compliance or compliance. Non-compliance would mean the effect would be significant, and compliance with the thresholds would mean the effect normally would be less than significant.

Like most municipalities, the City of South Pasadena has not adopted thresholds of significance. Thus, the significance criteria used in the analysis in Section 3.0 of this PEIR are derived from the current Appendix G of the State CEQA Guidelines. In addition, City policies and standards, as well as thresholds adopted by other public agencies with jurisdiction over select issues, are used as thresholds of significance, where applicable. For example, the South Coast Air Quality Management District publishes numerical thresholds for criteria pollutant emissions. Also, accepted technical and scientific data are used in some instances to determine if an impact would be considered significant. An effort has been made to use generally accepted thresholds upon which significance can be determined. These thresholds are identified under each environmental topic and have been used in analyzing the potential impacts of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

Proposed Policies and Actions

While the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs allow future developments that could adversely affect the environment, it also seeks to preserve and protect the existing environment and resources in the City. Thus, before an analysis of the potential impacts of the proposed Project is provided, components of the Project that would reduce or avoid potential adverse impacts on the environment are identified. The proposed policies and actions in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs that relate to the topic being analyzed are listed in this section, as they may serve to prevent or reduce the significance of potential adverse environmental effects.

Because these policies and actions have been incorporated into and would be implemented as part of the Project, when adopted, they allow the Project to be self-mitigating to a large extent. However, these policies and actions do not constitute mitigation measures as defined by CEQA, as they are not specifically created to address the impact of a project.

Environmental Impacts

The analysis of environmental impacts presented in this PEIR identifies direct and indirect, as well as short-term and long-term environmental impacts of the Project. While approval of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs itself would not result in direct or immediate changes to the environment, implementation of the General Plan and DTSP Update's policies and actions and 2021–2029 Housing Element Implementation Programs, as well as future development that would be allowed under the Project, could result in environmental changes and potential impacts. These impacts are indirectly attributable to the Project and thus, are analyzed in this PEIR as "impacts" to the extent feasible, without the availability of specific development concepts at this time.

The thresholds of significance (discussed above) provide the basis for distinguishing between impacts that are determined to be significant (i.e., impact exceeds the threshold of significance) and those that are considered less than significant. The analysis is structured to address each threshold, while considering any residual impact after implementing the proposed Project policies and actions, as well as any required regulatory compliance.

Where the impact analysis demonstrates that a potential environmental effect is too speculative or subjective for evaluation, or that the effect is beneficial, that conclusion is noted. Where the impact analysis demonstrates that a potential environmental effect could have a substantial or potentially substantial and adverse impact on existing physical conditions within the City, that conclusion is noted and followed by a discussion of how the proposed mitigation would address the potential impact.

Cumulative Impacts

While the extent of environmental changes that would occur with individual projects that are proposed, planned, or under construction in the City may not be significant, the sum of the impacts of these cumulative projects and the proposed Project may be cumulatively considerable, as defined in Section 15065(c) of the State CEQA Guidelines. Section 2.5, Approach to Cumulative Impact Analysis, of this PEIR contains a discussion of the overall methodology to determine the scope of projects and/or regional growth considered in the cumulative impact analysis. A discussion of the anticipated environmental changes resulting from the cumulative projects, from implementation of the General Plan and DTSP & 2021–2029 Housing Element Implementation Programs, and from the anticipated development under the proposed Project on a cumulative level, are addressed in each topical analysis presented in Section 3.0 of this PEIR, which contains a more detailed discussion of the cumulative impact analysis methodology for each environmental topic.

Mitigation Measures

The MMs under each topic, as determined necessary, have been developed to reduce potentially significant adverse impacts after relevant policies and actions in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs and any applicable regulatory requirements are implemented. Consistent with Section 15126.4 of the State CEQA Guidelines, MMs must be feasible and fully enforceable by the lead agency.

Level of Significance After Mitigation

This section identifies the level of significance of the identified impacts after the implementation of the recommended MMs, where applicable. Unavoidable significant adverse impacts are those effects that either cannot be mitigated or that remain significant even with a reduction in severity of the impact after mitigation.

References

Documents and other sources that have been used in the preparation of the analyses of each topical issue are identified in this section.

3.1 AESTHETICS

3.1.1 METHODOLOGY

This section describes the existing aesthetic character of the City of South Pasadena (City) and views of and from the City. It also analyzes the potential aesthetic impacts that may occur with future development projects under the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project).

Aesthetics generally refer to the identification of visual resources, the quality of one's view, and/or the overall visual perception of the environment. The issue of light and glare is related to both the creation of daytime glare due to the reflection of the sun (such as on glass surfaces) and/or an increase in nighttime ambient lighting levels (such as from building lights, street lights, and vehicle headlights). The information presented in this section is based on field reconnaissance, review of City design and development requirements and processes, and the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

3.1.2 EXISTING CONDITIONS

Visual Characteristics

The City is relatively small, occupying approximately 3.4 square miles, and has a population of approximately 26,580 persons (DOF 2022). Although situated about 5 miles from downtown Los Angeles, the City maintains a small-town atmosphere. Known as the City of Trees, the South Pasadena area is known for its residential neighborhoods and unique small businesses, and top-quality schools. More than 90 acres of parks and playgrounds are located throughout the City and more than 21,000 trees line its streets. The City has been designated a "Tree City USA" by the Arbor Day Foundation for 23 years, or every consecutive year since 1999 (Arbor Day Foundation 2023), and the abundance and well-maintained condition of mature trees throughout the City that is necessary to maintain this designation is a major contributing factor to the visual character experienced by residents and visitors.

Visual character is descriptive and not evaluative, which means that the development traits described for a given area are neither good or bad in and of themselves. The City contains several distinct areas that have common distinguishing characteristics that make them identifiable as places unique from other areas of a community. For instance, the area surrounding the Mission Street and Meridian Avenue intersection is unique in its development pattern, architectural styles, and presence of nightlife compared to the residential areas. In turn, the residential area in the southeast portion of the City is contrasted from the residential area in the Altos de Monterey area in the southwest of the City, both in topography and development style. A community's visual character can be defined by the historical development pattern, architectural styles, and design elements that have been implemented in the built environment over time. A discussion of the City's development history, and relationship to architectural styles, follows below.

The population of Southern California grew steadily in the early decades of the 20th century, and many newcomers were attracted to the suburban setting and bucolic atmosphere afforded by the City of South Pasadena. By the 1920s, the City's subdivisions and neighborhoods were almost entirely developed with detached, single-family dwellings predominantly designed in the Craftsman and Period Revival styles that were popular at the time. New businesses and institutions also arose to meet the day-to-day needs of the growing city, with most commercial development concentrated along Mission Street and Fair Oaks Avenue. The City also made notable improvements to its infrastructure and increased the scope of its civic resources during

this period. Most of the developable land within the City was built out by World War II, aside from two areas that were seen as prime development sites: the location of the demolished Raymond Hotel and the Monterey Hills area near the southwest corner of the City. Both were targeted for development after World War II, at which time Southern California experienced a sudden and substantial population increase and a corresponding shortage of housing. The Raymond Hotel site was rezoned to accommodate mid-rise multi-family residential development, and the Monterey Hills were subdivided and developed predominantly with single-family houses.

The City's existing development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses primarily, though not solely, located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road. In 1983, voters approved a ballot measure to adopt a Citywide 45-feet building height limit and no parking variance shall be granted to exceed five percent of the required spaces. As noted above, the City is known for its neighborhoods, and residential uses cover approximately 63.4 percent (1,386.3 acres) of the City's land area. Section 3.4 presents a detailed discussion of the numerous existing designated and eligible historic resources, which also contribute to the City's visual character. Overall, the City hosts a wide range of architectural styles and eras.

The City is relatively flat with a gentle slope to the south, with steeper hillside areas primarily in the southwest portion of the City (the Altos de Monterey area). Elevations within the City range from approximately 530 feet above mean sea level (msl) to 910 feet above msl. Most of the City occupies the valley floor emanating from erosion of the San Gabriel Foothills located approximately five miles to the north. As a result, public views of the San Gabriel Mountains, as well as the Repetto Hills to the west-southwest, are available and a prominent component of the background viewshed throughout much of the City. Within the City, views are generally short range, due to the density of urban development, other structures, and mature trees/vegetation.

The visual characteristics of the focus areas are discussed below.

Downtown Specific Plan

This 80-acre focus area includes some of the City's oldest buildings, such as The Meridian Iron Works, and some of the most recent development, such as the nearby Eight Twenty multi-family townhome development. Redevelopment along Mission Street, with a focus on the Mission Meridian A Line station, began with the adoption of the Mission Street Specific Plan in 1996. The Fair Oaks corridor within the DTSP area has a more commercial-leaning development style than Mission Street. While there are also some designated and eligible historic buildings, the visual character is often typical of late mid-century to more recent commercial development across the San Gabriel Valley, where architectural detail and contextual design was second to expedient construction. It is noted that designation or eligibility as a historic building does not necessarily relate to visual characteristics or confer an assumption of high visual quality. Overall, the DTSP area has the widest variety of building styles, ages, and uses. While there are multi-story buildings, up to 50 feet in height, and a mix of residential, commercial, and public uses, this focus area maintains its "small town" atmosphere and is a prominent gathering place for the community and experiences a higher level of foot traffic than elsewhere in the City.

Ostrich Farm

This 13.4-acre focus area occupies the westernmost portion of the City and serves as a gateway from the unincorporated County communities of Garvanza and Highland Park. This focus area extends from the three-way intersection of Pasadena Avenue, Hawthorne Street, and Monterey Road on the east, where the A Line also traverses and extends to the western City boundary just past the Arroyo Verde Road and Pasadena Avenue intersection. Compared to the other focus areas, this area has more curvilinear streets and irregular parcels and also has more topographic variation with an overall slope to the west and south. This focus area is a patchwork of differing architectural styles, massing, heights, and setbacks. While some structures exhibit architectural styles that are not remarkable by themselves, some structures exhibit more creative architecture that provides a visual touchpoint in the focus area. There are both designated and eligible historic resources within this focus area, these include the Cawston Ostrich Farm Site at 1010 Sycamore Avenue and the building at the corner of Monterey Road and Pasadena Avenue, 266 Monterey Road, currently operating as Charlie's Coffee House. The Ostrich Farm focus area includes commercial, including retail, traditional office, and creative office land uses as well as light industrial and multi-family residential uses. A portion of the Lower Arroyo Seco is located to the north across Pasadena Avenue, which provides public open space proximate to this area and a buffer from State Route (SR) 110 on the other side of the Arroyo Seco. Within the focus area, there is landscaping, including shrubs and mature trees in the roadway medians and within some of the building frontages. Although not within the focus area, the more naturally vegetated Low Arroyo Seco area to the north is a distinctive visual feature within the viewshed.

Neighborhood Centers

The Huntington Drive and Garfield Avenue neighborhood center has the most recent development, overall, of the focus areas, with Vet Villa veterinary hospital on the northwest corner that opened in 2018. There are no historic buildings, and the area is dominated by the large Ralph's grocery store and associated surface parking lot that fronts the building. The 4.5-acre area is also visually dominated by the intersection of Huntington Drive (six lane), Garfield Avenue (four lanes), and Atlantic Boulevard (four lanes) and associated lights, signs, and traffic. There is limited median landscaping, and the Ralph's parking lot and property line is landscaped. While this focus area is a gateway into the City, it does not present visually distinctive features.

The Huntington Drive and Fletcher Avenue neighborhood center is the smallest focus area, at 1.6 acres and is comprised of five parcels. Two of these have buildings identified as eligible historic resources in the City's historic resources inventory (refer to Exhibit 3.4-1 in Section 3.4, Cultural Resources). All structures, but one, are two stories and approximately 30 feet in height and have a similar setback from the street. As such, despite the differing architectural styles, the four buildings at the four corners have some visual continuity. The building in the southeast portion of the focus area is one story and is set back farther from the street; this is one of the two eligible historic structures. There is some median landscaping with some additional landscaping along the building frontages on the south side of Huntington Drive. Apart from the visual features of the two eligible historic buildings that may contribute to their status, this focus area does not generally present visually distinctive features.

The Huntington Drive and Fremont Avenue neighborhood center is also a patchwork of differing architectural styles, massing, heights, and setbacks. This 7.4-acre focus area is almost entirely commercial but some residential land uses are present in the southeast portion. This focus area is also dominated by roadways, such as six-lane Huntington Drive, two-lane Fremont Avenue, and the divided medians that divert traffic to and from the southern end of Fair Oaks Avenue with

limited connection between the separated areas. There are two eligible historic buildings, one at the southwest for of the Huntington Drive and Fremont Avenue intersection and one near the Huntington Drive and Primrose Avenue intersection. There is some median landscaping, including mature trees, and some lawn areas associated with the residential lots. Apart from the visual features of the two eligible historic buildings that may contribute to their status, this focus area does not generally present visually distinctive features.

Light and Glare

Artificial lighting is widely utilized in most urban and suburban areas to provide visibility for both traffic and security. The City has nighttime illumination typical of any urban area, which is attributable to urban land use developments (e.g., commercial, recreational, residential), street and highway lighting, and parking lot lighting throughout the City. Transient lighting from vehicular headlights also contributes to nighttime illumination in urban areas. Generally, the most prominent sources of existing nighttime light and glare are vehicular traffic and commercial land uses along the primary thoroughfares (e.g., Fair Oaks Avenue, Mission Street, Fremont Avenue, Huntington Drive, and Pasadena Avenue), traffic along SR-110 where it traverses the City, and parks with nighttime lighting and/or sports fields (i.e., Orange Grove Park). Daytime glare can also be caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces.

3.1.3 RELEVANT PROGRAMS AND REGULATIONS

State

Scenic Highways Program

The California Department of Transportation's (Caltrans) Scenic Highways Program (as contained in Sections 260 to 263 of the *California Streets and Highways Code,*) recognizes the visual resources and natural scenic beauty of California highways and adjacent corridors. These highways are designated based on the natural landscape seen by travelers, the scenic quality of the landscape, and the extent to which development is kept away from the corridor to preclude intrusion on the traveler's enjoyment of the view.

The program includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. The status of a scenic highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval and adopts a Corridor Protection Program that (1) regulates land use and density of development along the highway; (2) controls outdoor advertising; (3) provides guidelines for site planning; (4) controls earth-moving and landscaping activities; and (5) provides design guidelines for the appearance of structures and equipment. Caltrans approval leads to official designation and inclusion in the list of the State's Scenic Highways. The nearest officially designated scenic highway under the Scenic Highways program is Interstate (I) 210, starting at the I-210/SR-134 split and headed northwest, located approximately 1.8 miles due north of the City of South Pasadena. Additionally, the segment of SR-110 extending from East Colorado Boulevard in the City of Pasadena and continuing southwest to its intersection with US-101, which traverses through the northern portion of the City of South Pasadena, is also identified as the Arroyo Seco Historic Parkway under the National Scenic Byway program (Caltrans 2023).

Housing Legislation

The California legislature has passed numerous bills related to housing in the last few years. The following discussion briefly describes housing laws that may affect the scale, height, and/or density of housing developed pursuant to the City's planning documents and policies. It is anticipated that further legislation will be passed in coming years considering the continuing housing shortage in the State.

Density Bonus Laws

California's Density Bonus Law (Section 65915 et. seq. of the Government Code) grants bonuses, concessions, waivers, and parking reductions to projects with qualifying affordable housing. The State's Density Bonus Law continues to be the most commonly used tool to increase housing density and production. Prior to the passage of Assembly Bill (AB) 1763, projects qualifying for a density bonus were entitled to one to three "incentives" and "concessions" to help make the development of affordable and senior housing more economically feasible, such as reduced setback and minimum square footage requirements as requested by the developer. AB 1763 provides a fourth incentive and concession to 100 percent affordable projects. If a project is located within a half mile of a major transit stop, AB 1763 goes even further by eliminating all local government limits on density and allowing a height increase of up to 3 stories or 33 feet. The Density Bonus Law was further amended by Senate Bill (SB) 1227, which provided density bonuses for projects that included student housing, and SB 290 adds the ability to request one concession or incentive for projects that include at least 20 percent of the total units for lower-income students in a student housing development. The floor area ratio (FAR) is a common mechanism in local zoning codes that limits the total floor area of a building in relation to the square footage of a lot. SB 478 prohibits agencies from imposing a FAR of less than 1.0 for a housing development project (comprised solely of residential units, a mixed-use development with at least two-thirds of the square footage attributed to residential uses, or transitional or supportive housing) consisting of three to seven units and a FAR of less than 1.25 for housing development project consisting of eight to 10 units. Additionally, an agency may not deny a housing development project located on an existing legal parcel solely on the basis that the lot area does not meet the agency's requirement for minimum lot size. To qualify, a project must consist of 3 to 10 units in a multifamily residential zone or mixed-use zone in an urbanized area and cannot be within a single-family zone or within a historic district.

City

2009 Design Guidelines

In 2009, the City adopted the *City of South Pasadena Residential Design Guidelines* and the *City of South Pasadena Commercial Design Guidelines* (South Pasadena 2009a, 2009b). The City's design guidelines increase the awareness of building owners and designers to the architectural, historic, and site planning features that are traditional to the City and emphasize the importance of preserving and maintaining those features when making alterations or designing new construction. Design guidelines assist in determining acceptable alterations, repairs, and additions to existing buildings and appropriate design criteria for new buildings. However, they are not meant to dictate specific design solutions or stifle creative design. The guidelines do not substitute for case-specific analysis and thoughtful input from designers, project sponsors, City employees and volunteer design review participants. These guidelines were intended to update the City's then-existing design guidelines to provide clear and explicit guidance to all

review agencies and City departments to facilitate reasonable, efficient, and fair review of proposed projects.

The design guidelines are applicable to most construction within the City. They apply to any project that requires a building permit and/or change of use approval, but, for residential projects, do not apply to signage approvals. The guidelines supplement, but do not override, those found in the City's Zoning Code and serve as the basis for decisions by the Design Review Board and by City staff. In addition, the guidelines for historic residences assist the Cultural Heritage Commission in making the required findings under the City's Cultural Heritage Ordinance and the California Environmental Quality Act (CEQA).

Municipal Code

Zoning Code

Chapter 36, Zoning Code, of the South Pasadena Municipal Code (SPMC) implements the policies of the South Pasadena General Plan by classifying and regulating the uses of land and structures within the City in a manner consistent with the General Plan.

Section 36.300 et. seq. of the SPMC describes general property development and use standards, includes several sections that affect the visual quality of a property. These include standards for height (Section 36.300.040), screening (Section 36.300.070), either between land uses or of unsightly features on a property; placement of mechanical equipment (Section 36.300.080); outdoor lighting requirements (Section 36.300.090); and detailed performance standards to promote land use compatibility (Section 36.300.110).

Section 36.320, Signs, regulates the placement, type, size, and number of signs allowed within the City, and requires the proper maintenance of signs. Section 36.330 provides landscape standards for proposed development to improve the livability and attractiveness of South Pasadena, and to protect public health, safety, and welfare. Section 36.340, Hillside Protection, provide development standards intended to preserve the City's scenic resources by encouraging retention of natural topographic features and vegetation.

Section 36.350.200 et. seq. of the SPMC presents the City's Accessory Dwelling Unit (ADU) Ordinance, which permits ADU's in compliance with State law and became effective March 4, 2022. The ADU Ordinance defines the standards that apply for properties containing single-family or multi-family housing within all zoning districts that allow residential uses and are in addition to all other applicable standards found in the Zoning Code. The ADU Ordinance describes design and development standards for all ADUs and additional standards for units in front on a primary dwelling, on an historic property, and in the City-designated high risk fire area (refer to Section 3.16, Wildfire, of this PEIR for more information).

Section 36.375 et. seq. of the SPMC presents the City's current Inclusionary Housing Ordinance, which became effective June 4, 2021. Inclusionary housing promotes the inclusion of housing units that are affordable for moderate- and low-income households in new residential projects by providing incentives and cost offsets to developers. The City's Inclusionary Housing Ordinance applies to all residential development of three or more dwelling units, including residential portions of mixed-use developments. Section 36.375.080 of the SPMC describes design incentives as an alternative and more streamlined State density bonus review process specific to South Pasadena. The design incentives are intended to encourage architectural designs that are well-conceived, thoughtfully detailed, consistent with the character of the City, and compatible with the zoning district in which they are located.

Tree Protection

The Public Works Department is responsible for streets, public buildings, water, sewer systems, street lighting and park maintenance. The City Council amended the SPMC to further regulate removal of trees of 12 inches in diameter or larger on any property within the City. In addition, regulations have been added to protect mature heritage, native, and oak (*Quercus* sp.) trees (4 inches in diameter at breast height or larger) on any property, public or private, within the City. Chapter 34, Trees and Shrubs, of the SPMC defines the regulations for the protection (during development activity), trimming, and/or replacement of protected trees in the City.

3.1.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse aesthetic impact if it would:

Threshold 3.1a: Have a substantial adverse effect on a scenic vista;

Threshold 3.1b: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;

Threshold 3.1c: Substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; and/or

Threshold 3.1d: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.6 Preserve, manage, and grow the tree canopy.

A1.6 Adopt an Urban Forest Management Plan.

P2.6 Foster a targeted amount of new growth within the Ostrich Farm district, Huntington corridor, Mission Street, and Fair Oaks Avenue to create more vibrant and attractive commercial districts and support the City's tax base.

A2.6b Encourage redevelopment of large single use retail sites along Fair Oaks Avenue to include a mix of uses, appropriate development intensity and an active street front.

A2.6c Promote infill development on vacant and underutilized sites (such as surface parking lots), particularly on main corridors in the Downtown area that currently detract from the City's pedestrian environment by breaking with retail frontages and provide no or little street activation, and do not fully capitalize on the City's fiscal opportunity.

P2.10 Encourage a diversity of housing types to promote mixed-use districts and leverage transit access.

A2.10a Support higher-intensity and high-quality multifamily development near the Metro A Line Station, close to retail activity.

P3.4 Conserve South Pasadena's character and scale, including its traditional urban design form, while creating places of enduring quality that are uniquely fit to their time and place.

A3.4a Introduce new infill buildings and renovate existing buildings in a manner that preserves and enhances South Pasadena's walkable urbanism of interconnected streets lined by buildings that engage, frame, and activate the street.

P6.1 Promote higher density mix of uses that encourage physical activity.

A6.1a Provide a mix of land uses within new infill projects in the downtown area and neighborhood centers.

A6.1b Activate the ground floor with retail and service uses with attractive and engaging store frontages.

P8.1 Expand parkland inventory to strive for the standard of 5 acres/1000 residents.

A8.1a Procure a linear park easement from Edison.

A8.1b Consider the feasibility of consolidating individual islands at the intersection of Huntington Drive and Fair Oaks Avenue into a park without impacting the orderly flow of traffic.

P8.2 Ensure the maximum distance between residents' homes and the nearest public park or preserve is ½ mile; ¼ mile is preferred.

A8.2 Expand the overall parks and recreation system through repurposing public land such as excess street space, partnering with other organizations like SPUSD, churches, YMCA, and similar institutional uses for access and joint use of open space and facilities, and use other creative means to help address recreational service gaps.

P8.5 Develop and support a citywide parklet program.

A8.5a Develop appropriate design guidelines for parklets and streamline the permitting process and maintenance requirements.

A8.5b Support implementation of parklet demonstration projects in the Downtown area.

A8.5c Identify locations for parklets in citywide along streets with foot traffic, where automobile traffic is low-speed, and where there are surrounding establishments that can provide a level of surveillance.

P8.6 Identify and remove barriers to access parks. Encourage walking and biking as preferred way to get to and from parks.

A8.6a Increase visibility and access to Orange Grove Park by removing fence barrier.

A8.6b Improve sidewalk conditions leading to parks. Install a new sidewalk on Stoney Drive, the main access that leads down to the lower Arroyo.

A8.6c Provide bike lanes, and biking facilities such as racks and lockers.

P8.8 Provide creative expressions in parks and recreations facilities and programs.

A8.8a Allow art installations in parks in compliance with the City's Public Art Program (SPMC 36.390).

P9.9 Enhance the Public Art Program.

A9.9a Develop an inventory of public art resources in the City.

A9.9b Develop a Public Art Master Plan to establish vision for the Public Art Program and the necessary policies and administrative procedures to achieve that vision.

P9.10 Promote education and interactive components to increase understanding of public art and their contributions to South Pasadena.

A9.10a Implement uniform plaques for permanent public art collections that inform viewers about the public art piece and utilize mobile technologies to engage viewers and connect them to new information.

A9.10b Create events such as docent-led, self-guided, and mobile app tours of public art to promote the City's creative identity.

A9.10c Utilize digital media such as podcasts, educational videos, blocks, listservs, and e-newsletters to create public education materials.

P9.13 Develop strategies for the treatment of Planning Districts (identified in the Survey Update - e.g., Altos de Monterey).

P9.14 Support community-wide understanding and provide clear and up-to-date guidance as to how to apply the Secretary of the Interior's Standards for Rehabilitation among the Cultural Heritage Commission and the public, including property owners, architects and contractors.

A9.14a Update the Design Guidelines, which are the basis of design review for all properties in the City, whether historic or non-historic.

A9.14b Prepare separate Design Guidelines or Standards for each identified type of historic district.

A9.14c Maintain City-owned historic buildings and structures at a level that sets a standard for other owners of historic properties in the City.

A9.14d Study adjustments to the Zoning code that would allow or encourage adaptive reuse.

P9.15 Promote the conservation of older historic landscapes and natural features that contribute to the character of historic districts and landmarks.

A9.15a Assess the sustainability and long-term health of the City's canopy of street trees and trees in parks.

A9.15b Conduct a Cultural Landscape study of City parks and other significant landscapes and open spaces to identify their historic features and character.

A9.15c Encourage incorporation of natural features, existing trees, and archaeological sites into new development projects with sensitivity to ensure their protection and public enjoyment.

P9.16 Promote the importance of integrating new development with the historic character of neighboring historic buildings and districts.

A19,16 Develop and maintain design guidelines that sustain architectural continuity for infill development within existing historic districts through size, massing, scale, materials, and other relevant factors.

Downtown Specific Plan Update

P1.3 Preserve, manage, and grow the tree canopy.

P3.1 Conserve the small town character and scale of the Downtown area, including its traditional urban design form, while creating places of enduring quality that are uniquely fit to their time and place.

A3.1a Develop and adopt a form-based development code that requires the highest standards of context sensitive architecture, urban design, and landscaping.

A3.1b Introduce new infill buildings and renovate existing buildings in a manner that preserves and enhances downtown's walkable urbanism of interconnected streets lined by buildings that engage, frame, and activate the street.

P3.2 Remove regulatory and procedural barriers to good design.

A3.2a Develop and adopt a Form-Based Code for the Downtown area that emphasizes pedestrian orientation, integration of land uses, treatment of streetscapes as community living space, and offers a streamlined development review process.

P3.3 Expand the inventory of publicly accessible community gathering spaces so that residents are within a short walking distance of a park or recreational area.

A3.3a New buildings should incorporate public realm improvements described in the Downtown Vision and integrate such improvements into their existing context in a way that enhances Downtown's public space network.

A3.3b Allow parklets on Mission Street to provide visual interest and expand the useable area of the sidewalk.

P3.6 Support and ensure restoration and reuse of the historic Rialto Theater.

A3.7a Renovate and protect the historic elements of the theater.

A3.7b Interim uses should be mindful of the historical assets and do no harm.

P6.1 Promote higher density mix of uses that encourage physical activity.

A6.1a Provide a mix of land uses within new infill projects.

A6.1b Activate the ground floor uses along Mission Street and Fair Oaks Avenue with attractive and engaging store frontages and maximize transparency of facades at ground level to increase visual interest and promote walkability.

P6.4 Repurpose vacant and underutilized spaces that detract from the vitality in the Downtown area for active living.

A6.4 Collaborate with Downtown residents and merchants to leverage and repurpose vacant and underutilized lots with temporary or permanent active living and mental wellbeing activities such as community gardens, open spaces, or pop-up events and festivals.

P6.6 Design buildings to encourage physical activity.

A6.6 Encourage aesthetic treatments such as vivid colors, artwork, and music; and treat stairs with the same finishing standards as other public corridors in the building.

P6.8 Expand the opportunities in the Downtown area to interact with nature within the streets, open spaces, and buildings.

A6.8a Incorporate street trees, street side planters, and parklets into street design. Incorporate appropriate landscaping features in alley design wherever possible.

A6.8b Develop a network of public and private green space.

P7.2 Employ a range of contextual lighting options to promote safety and security on downtown streets.

A7.2a Identify downtown public streets and open spaces that are poorly lit and install context-sensitive streetlights.

A7.2b Install string lights in alleys that provide connections to destinations.

A7.2c Require new development to submit a lighting plan that demonstrates an appropriate level of lighting in the public and private realm.

P8.1 Encourage the dynamic and flexible use of existing open spaces and promote a variety of new recreation and open space uses, where appropriate.

A8.1a Explore ways to use the public rights of way as active open space, such as parklets and exercise amenities or for special events. Redesign the open space around the Metro A Line Station to create a large, cohesive, and central civic amenity, improve pedestrian and vehicular flow, and improve the paved surface aesthetics.

A8.1b Redesign Orange Grove Park with enhanced sight lines and an active, accessible, and visually engaging perimeter design. Explore possible use of Orange Grove for other uses in addition to AYSO & Little League.

A8.1c Continue to partner with the South Pasadena School District site for the use of their central court to host a variety of public events and festivals.

A8.1d Amend the standards to require and/or encourage private development to provide a range of public and private open spaces on the block, lot, and building.

A8.1e Develop long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreational amenities.

2021–2029 Housing Element Implementation Programs

Goal 2.0 Encourage and Assist in the Provision of Affordable Housing

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

3.1.6 ENVIRONMENTAL IMPACTS

Threshold 3.1a: Would the Project have a substantial adverse effect on a scenic vista?

The City's existing General Plan defines that the "hillsides and ridgelines…provide a scenic backdrop for the entire community". Therefore, protection of the City's hillside areas is a matter of ensuring that development minimizes severe alteration of landform, flood problems, soil erosion, and landslide damage. It is also a matter of protecting the viewshed, both from and to these hillsides, and retaining as much natural vegetation as possible. The City's zoning code includes hillside development standards to guide development and protect this natural resource. The existing General Plan's Open Space and Resource Conservation Element includes goals and policies to preserve scenic resources, which focus on the hillsides and native vegetation (South Pasadena 1998).

The City as a whole, as well as the focus areas, is a developed, urban landscape consisting of a mix of residential, commercial, mixed use, civic/public, open space, and some light industrial land uses. The proposed land use plan assumes that the existing, established development pattern would stay essentially the same, with an incremental intensification of existing and new land uses, where future development and redevelopment would be designed and scaled to complement surrounding uses. The majority of existing land uses in the City are not expected to change substantively, and new development is anticipated to occur largely as infill redevelopment or development. Most future development is anticipated to occur in focus areas, within the Ostrich Farm area and along Mission Street, Fair Oaks Avenue, and Huntington Drive, account for approximately five percent (107 acres) of the City's land area.

The focus areas and sites identified for housing would experience additional development due to future population growth, natural demographic changes, and revitalization needs. Development standards, such as building separation, height, and setback requirements for individual structures would lead to the development of projects that are sensitive to distant and near hillside and mountain. The maximum height proposed under the General Plan Update would remain at the limit of 45 feet for most of the City. However, as discussed in Section 2.0, Environmental Setting and Project Description, the City is subject to a Court Order that requires certain actions by the City within certain timeframes to bring the Housing Element into compliance with Section 65754 of the Government Code. One of these required actions is to seek, through voter approval by December 31, 2024, the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DU/acre). If an initiative is not adopted by that deadline, the Court Order requires the City to complete a mid-cycle revision of the 2021-2029 Housing Element Implementation Programs to reduce all sites with a base density in excess of 50 DU/acre to an assumed maximum density of 50/DU/acre within nine months.

Additionally, the AB 1763 (amendment to the State's Density Bonus Law) supersedes the City's voter approved height limit and enables affordable housing projects that meet specific criteria to exceed any locally established height limit by up to 3 stories or 33 feet under specific circumstances, as discussed above. Other housing legislation that relates to the Density Bonus Law does not expressly pertain to height limits. However, increased density pursuant to any density bonus has the potential to result in a development project that exceeds the City's current height limit through incentives/concessions and/or waivers pursuant to state density bonus law.

However, the San Gabriel Mountains rise to heights over 6,000 feet above msl and would remain partially visible from most areas of the City and from many north-south public streets, despite any

intensification of land uses and/or increased height from future development pursuant to the proposed Project. Although there would be an intensification of uses in some areas of the City and some may consider the proposed land use plan to be transformational, it is expected that the existing level of visual obstruction by intervening development in the City would be overall similar to the existing condition. The number of projects that would elect to meet the density bonus requirements that would enable a height increase are not expected to be numerous enough to result in a substantial increase in obstructions of the San Gabriel Mountains throughout most of the City. Overall public views of the hillsides and mountains would not appreciably change with implementation of the Project. Implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts related to scenic vistas, and no mitigation is required.

Threshold 3.1b: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As noted above, the nearest officially designated scenic highway under the State's Scenic Highways program is a segment of the I-210 located approximately 1.8 miles due north. Due to distance and intervening development, the City is not visible from this segment of I-210. Additionally, the segment of SR-110 that traverses the northern portion of the City is designated as the Arroyo Seco Historic Parkway under the National Scenic Byway program. Views of the City from the SR-110 may change where the northernmost portion of the Downtown Specific Plan area abuts the freeway, as intensification of land uses could be developed under the proposed land use plan. This segment of the SR-110 is situated approximately 15 feet below the City's land area. Because of these factors, properties in the City generally have limited visibility from the freeway. However, the Fair Oaks Avenue off-ramp rises to meet the elevation of the Fair Oaks Avenue and Grevalia Street intersection. Motorists leaving SR-110 at this location would briefly have greater visibility of any new, potentially more intensive, land uses developed pursuant to the DTSP, situated immediately south of this intersection. However, the existing land uses on the south side of Grevalia Street would not be considered scenic resources, as the buildings are not identified as historic resources on the City's Inventory, nor do they exemplify a unique form of architecture. Further, as discussed below under Threshold 3.1c, the overriding intent of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs is to ensure maintenance of the City's character through high-quality, context-specific design and enhancement of the public realm. Development that would have the potential to occur along an area abutting a segment of the SR-110 that traverses the City, would be designed to be visually pleasing in terms of massing, fenestration, color palette, landscape and hardscape, and other standards.

The most notable scenic resource in the City visible from SR-110 is the City of South Pasadena "rock sign" situated on a grassy slope in Arroyo Park next to Arroyo Drive, near the western portal of the SR-110 into the City. This sign and the surrounding area would not be altered because of the Project. As such, the potential change in land uses from the limited portion of SR-110 that would be visible to passing motorists within the northern portion of the City, would not be considered substantially damaging to a scenic resource. Therefore, implementation of the Project would not adversely affect any scenic resources within a State scenic highway. Implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts related to scenic highways, and no mitigation is required.

Threshold 3.1c: Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would change the visual quality of individual development sites, as structures and site improvements are introduced on vacant lands and as older developments are replaced with newer structures and site improvements that would likely have a different architectural style and may be more intense than the pre-existing land use. Increased urbanization could be expected as properties are developed and/or redeveloped with higher intensity/density uses.

The determination of whether the changes in the visual quality of a site would degrade an area or its surroundings, and thus be significant and adverse, is dependent upon the perspective of the viewer. Preferences for one architectural style over another and issues related to the preservation of existing structures versus renovation/redevelopment render a determination of impacts to visual character a relatively subjective endeavor. However, except in cases where local design discretion is superseded by State law, all proposed development would be subject to the *City of South Pasadena Residential Design Guidelines* and the *City of South Pasadena Commercial Design Guidelines*, and related design review process. The design guidelines are applicable to most construction within the City. It is noted the guidelines supplement, but do not override, those found in the City's Zoning Code and serve as the basis for decisions by the Design Review Board, Planning Commission, and/or by City staff members. For proposed future developments that may affect a designated or potential historic resource, that project would additionally be subject to the City's Cultural Heritage Ordinance and related Cultural Heritage Commission review process. The Cultural Heritage Commission is a five-member body that is advisory to the City Council on all issues relating to the identification, retention, and preservation of landmarks and historic districts. Cultural Heritage Commission meetings are held monthly. Also, the City administers a strict tree protection policy that contributes to the maintenance of the City's Tree City USA designation and the associated aesthetic and environmental benefits of a substantial tree canopy.

The General Plan and DTSP Update sets forth numerous policies and actions that would enhance community aesthetics, as listed above. In particular, the *Our Well Planned Community* chapter of the General Plan and DTSP Update addresses the anticipated distribution, intensity, and character of both existing and future land uses and development. There are several policies and actions in this chapter, and in other chapters, related to aesthetic quality, including the following: conserve South Pasadena's character and scale; introduce new infill buildings and renovate existing buildings in a manner that preserves and enhances South Pasadena's walkable urbanism; update the Design Guidelines for all properties in the City, whether historic or non-historic; develop and maintain design guidelines that sustain architectural continuity for infill development within existing historic districts through size, massing, scale, materials, and other relevant factors; conserve the small town character and scale of the Downtown area, including its traditional urban design form, while creating places of enduring quality that are uniquely fit to their time and place; remove regulatory and procedural barriers to good design; and encourage aesthetic treatments such as vivid colors, artwork, and music; and treat stairs with the same finishing standards as other public corridors in the building.

Finally, the DTSP Update has an accompanying code (herein referred to as DTSP Code or Code) to guide the DTSP's implementation, providing all requirements for development and land use

activity with the DTSP's boundaries. The type of code presented in the DTSP fosters predictable built results and a high-quality public realm by using physical form, rather than separation of uses as in traditional zoning codes, as their organizing principle. The prescriptive standards in the Code would ensure that new development projects demonstrate the highest standards of urban design, architecture, streetscaping, and landscaping. The DTSP Code defines land use standards, development standards by zone, building standards, frontage standards, street standards, block standards, open space standards, landscape standards, sign standards, and other standards, such as for walls, outdoor dining in the right-of-way, and loading spaces.

As discussed under Threshold 3.1a above, the proposed land use plan assumes that the existing, established development pattern would stay essentially the same, with an incremental intensification of existing and new land uses, where future development and redevelopment would be designed and scaled to complement surrounding uses. The majority of existing land uses in the City are not expected to change substantively, and new development is anticipated to occur largely as infill redevelopment or development. Most future development is anticipated to occur in focus areas. As also discussed above, the City is subject to a Court Order that requires the City is to seek, through voter approval by December 31, 2024, the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs/acre). However, the maximum height proposed under the General Plan Update would remain at the limit of 45 feet for most of the City. As discussed, AB 1763 (amendment to the State's Density Bonus Law) can supersede the City's height limit and enables affordable housing projects to exceed any locally established height limit by up to 3 stories or 33 feet under specific circumstances.

While the Density Bonus Law is the existing regulatory setting as of mid-2022, the combination of proposed policies to increase density in selected areas of the City to meet the RHNA allocation and recommended surplus with the State Density Bonus Law and required ballot measure related to the height limit may result in more structures that exceed the City's 45-foot height limit than would have otherwise been the case. In summary, the City has focused the potential for new development activity mostly within the discrete focus areas and has determined that these areas are able to appropriately accommodate the increased density and development to benefit the City as a whole, environmentally, economically, and socially. Even with increased density associated with these focus areas and the potential housing development, the Project proposes essentially the same land use patterns as currently exist and defines policies and actions that are intended to guide design decisions. Through adherence to the proposed policies and actions set forth in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, including the DTSP Code, and through compliance with City regulations and processes, implementation of the Project would apply all feasible means to avoid a substantial degradation of the City's visual quality and character.

Nonetheless, it is acknowledged that, due to State mandated housing- and land use-related program and regulations and the court-ordered ballot initiative to repeal the height limit on selected sites, the future change in visual character in the City may be considered adverse to some segments of the community. As discussed under Threshold 3.1a, although there would be an intensification of uses in some areas of the City that some would consider to be transformational, the overriding intent of the Project is to ensure maintenance of the City's character through high-quality, context-specific design and enhancement of the public realm. To balance preservation of existing uses and land use transitions where development or redevelopment occur, the focus areas and potential housing sites are primarily situated in those portions of the City where change is desired to both diversify land uses and take advantage of proximity to the Metro A Line Station. Although some factors (i.e., RHNA allocations and State

legislation) are not in the City's control, in consideration for the community's point of view on this issue, the direct and indirect effects of the Project would be considered a significant and unavoidable impact to visual character. There are no feasible mitigation measures to reduce this impact, as it is the result of State mandates superseding City planning control or requirements of a court order.

Threshold 3.1d: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Future development under the proposed Project would be accompanied by new sources of light and glare. These would include exterior security lighting, lighted signs, parking lot lighting, and pedestrian pathway lighting. These new light sources would result in an increase in the lighting levels of individual sites and the surrounding areas, which have the potential to impact adjacent land uses, especially residences. Newly constructed buildings could create new sources of daytime glare in the form of glazed building surfaces, use of mirrors and glass as exterior building surfaces, and other reflective materials that would reflect the sun or light sources and create glare.

As discussed above under the analysis of Threshold 3.1c, the General Plan Update proposes five focus areas that encompass the spaces anticipated to have the most substantive changes in development. The 2021–2029 Housing Element Implementation Programs identifies additional potential housing sites outside of the focus areas. Additionally, as identified on Exhibit 2-4, all of the proposed development areas are situated along major arterial corridors with both vehicular and light rail and are already subject to the most intensive light and glare from existing land uses. However, the established residential neighborhoods throughout the City would remain largely unchanged. Proposed land uses that would be particularly light- or glare-intensive (such as a sports arena) are not planned in the City. Additionally, most of the land area in the City is currently developed. Any new light sources would be required to comply with the SPMC standards (Section 36.300.090) for exterior lighting, which require a lighting plan to be submitted to the City and defines that lighting fixtures shall be appropriate in scale, intensity, and height to the use they are serving. Because both the geographic extent and physical scale of proposed land use changes with the Project are limited, a substantial increase in nighttime light and glare over the existing ambient levels is not anticipated. There would be less than significant impacts related to substantial new sources of light and glare, and no mitigation is required.

3.1.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

The geographic context for cumulative visual impacts is generally the City of South Pasadena and those areas within adjacent jurisdictions that share viewsheds or lines of sight with the City, such as continuous arterial corridors between one city and another and hillside areas of the San Gabriel Mountains to the north.

Regarding scenic vistas, as discussed above, views of the San Gabriel Mountains in the distance to the north or nearby views of the Repetto Hills would not appreciably change with implementation of the Project. As discussed above, the geographic scope and scale of proposed land use changes associated with implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, while it would be noticeable would

maintain the overall land use pattern of the City. Based on this, development under the Project would not incrementally contribute to a significant cumulative impact related to substantial adverse effects on a scenic vista.

As discussed above, views of the City from SR-110, a designated National Byway, may change with future development under the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. However, because implementation of the Project would not adversely affect visual character and quality of the City, views from the SR-110 would not be considered substantially damaged. As such, development under the Project would not incrementally contribute to a significant cumulative impact related to scenic highways.

As discussed, the proposed development areas are all located along arterial corridors, such as Fair Oaks Avenue, Mission Street, Huntington Drive, and Pasadena Avenue, which connect adjacent jurisdictions. As such, land use development within the focus areas would lead to visual changes within the City that would occur in the context of future growth and development in adjacent jurisdictions that would be visible by residents and visitors traveling between South Pasadena and surrounding cities. Additionally, the 2021–2029 Housing Element Implementation Programs identifies potential housing sites outside of the focus areas. As discussed above, due to State-mandated housing-related programs and regulations, including the RHNA allocation and density bonus laws, and court-ordered ballot initiative to repeal the height limit on selected sites, the future change in visual character in the City may be considered adverse to some segments of the community. As discussed previously, redevelopment would be subject to City design guidelines and associated review processes. These requirements are intended to ensure a high level of design quality. The overriding intent of the Project is to ensure maintenance of the City's character through high-quality, context-specific design and enhancement of the public realm. However, the future change in visual character in the City may be considered adverse to some segments of the community and this is identified as a direct and indirect significant and unavoidable impact to visual character. As such, development under the Project would be considered to incrementally contribute to a significant cumulative impact related to substantial degradation of visual character of areas surrounding the City of South Pasadena.

Existing sources of light and glare in the City and surrounding area generate ambient lighting levels that define nighttime light intensities. With limited development in the City and the surrounding area, coupled with the City's policies to limit light spillover, development under the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not incrementally contribute to a significant cumulative impact to light and glare in the region.

3.1.8 MITIGATION MEASURES

There are no feasible mitigation measures to reduce the significant and unavoidable impacts identified related to changes in visual character. The City would be implementing all feasible actions through both existing review processes and development code requirements and proposed processes and codes. The impact is identified as significant and unavoidable not because the City believes there would be visually degrading development constructed as a result of the Project but in consideration of the subjective nature of the topic of aesthetics and the expected opinion of some segments of the community.

No significant adverse impacts related to scenic vistas, scenic highways, and light and glare have been identified with implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, and, therefore, no mitigation is required.

3.1.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Visual Character

Significant and unavoidable impact at both a program and cumulative level.

Scenic Vistas, Scenic Highways, and Light and Glare

Less than significant at both a program and cumulative level.

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3.2 AIR QUALITY

3.2.1 METHODOLOGY

This section addresses air quality emissions associated with the implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project).

In 2022, ICF International, Inc. in collaboration with the Sacramento Metropolitan Air Quality Management District (SMAQMD), Fehr & Peers, STI, Ramboll, and the California Air Pollution Control Officers Association (CAPCOA), released the latest version of the California Emissions Estimator Model™ (CalEEMod™), version 2022.1 (CAPCOA 2023). Since then, various model updates have been released, the most recent being Version 2022.1.1.14, released on June 15, 2023. The purpose of this model is to calculate construction-source and operational-source pollutants (NO_x, VOC, PM10, PM2.5, SO_x, and CO, defined below) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. CalEEMod version 2022.1.1.14 was used to estimate the air pollutant emissions associated with buildout of the Project. The inputs and data for the Air Quality and GHG modeling are described in Appendix B of this Program Environmental Impact Report (PEIR).

3.2.2 EXISTING CONDITIONS

South Coast Air Basin

The City of South Pasadena (City) is located in the South Coast Air Basin (SoCAB) within the jurisdiction of SCAQMD. The SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and State air quality standards, discussed further below. The SoCAB is a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SoCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The larger SCAQMD boundary includes 10,743 square miles.

Regional Climate

The regional climate has a substantial influence on air quality in the SoCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality.

The annual average temperatures throughout the SoCAB vary from the low to middle 60s (degrees Fahrenheit). Due to a decreased marine influence, the eastern portion of the SoCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SoCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SoCAB have recorded maximum temperatures above 100°F.

Although the climate of the SoCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SoCAB climate. Humidity restricts visibility in the SoCAB, and the conversion of sulfur dioxide to sulfates is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SoCAB is 71 percent along the coast and 59 percent inland. Since the ocean effect is dominant, periods of heavy early

morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast.

More than 90 percent of the SoCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SoCAB with frequency being higher near the coast. The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SoCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean.

In the SoCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as a lid to pollutants over the entire SoCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level.

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as nitrogen oxides (NO_x) and carbon monoxide (CO) from vehicles, as the pool of cool air drifts seaward.

Criteria Pollutants

Air quality is defined by ambient air concentrations of seven "criteria air pollutants", which are a group of common air pollutants identified by the U.S. Environmental Protection Agency (USEPA) to be of concern with respect to the health and welfare of the general public. Federal and State governments regulate criteria air pollutants by using ambient standards based on criteria regarding the health and/or environmental effects of each pollutant. These pollutants include nitrogen dioxide (NO_2), ozone (O_3), particulate matter (including both respirable particulate matter with a diameter of 10 microns or less [PM10] and fine particulate matter with a diameter of 2.5 microns or less [PM2.5]), CO, sulfur dioxide (SO_2), and lead. A description of each criteria air pollutant, including source types and health effects, is provided below:

Nitrogen Dioxide

Nitrogen gas, normally relatively inert (nonreactive), comprises about 80 percent of the air. At high temperatures (e.g., in a combustion process) and under certain other conditions, nitrogen can combine with oxygen to form several different gaseous compounds collectively called nitrogen oxides (NOx). Nitric oxide (NO), NO_2, and nitrous oxide (N_2O) are important constituents of NOx. NO is converted to NO_2 in the atmosphere. Motor vehicle emissions are the main source of NOx in urban areas.

NO_2 is a red-brown pungent gas and is toxic to various animals and to humans because of its ability to form nitric acid with water in the eyes, lungs, mucus membranes, and skin. In animals, long-term exposure to NOx increases susceptibility to respiratory infections, lowering resistance to such diseases as pneumonia and influenza. Laboratory studies show that susceptible humans, such as asthmatics, who are exposed to high concentrations of NO_2 can suffer lung irritation and, potentially, lung damage. Epidemiological studies have also shown associations between NO_2 concentrations and daily mortality from respiratory and cardiovascular causes, and with hospital admissions for respiratory conditions.

While the National Ambient Air Quality Standards (NAAQS) only address NO_2, NO and NO_2 are both precursors in the formation of O_3 and PM2.5, as discussed below. Because of this and the fact that NO emissions largely convert to NO_2, NOx emissions are typically examined when assessing potential air quality impacts.

Ozone

Ozone is a secondary pollutant, meaning that it is not directly emitted. It is a gas that is formed when volatile organic compounds (VOCs) (also referred to as reactive organic gases or reactive organic compounds) and NOx undergo photochemical reactions that occur only in the presence of sunlight. The primary source of VOC emissions is unburned hydrocarbons in motor vehicle and other internal combustion engine exhaust. NOx forms as a result of the combustion process, most notably due to the operation of motor vehicles. Sunlight and hot weather cause ground-level O_3 to form; as a result, ozone is known as a summertime air pollutant. Ground-level O_3 is not to be confused with atmospheric O_3 or the “ozone layer”, which occurs very high in the atmosphere and shields the planet from some ultraviolet rays. Ground-level O_3 is the primary constituent of smog. Because O_3 formation occurs over extended periods of time, both O_3 and its precursors are transported by wind, and high O_3 concentrations can occur in areas well away from sources of its constituent pollutants.

People with lung disease, children, older adults, and people who are active can be affected when ozone levels exceed ambient air quality standards. Numerous scientific studies have linked ground-level ozone exposure to a variety of problems, including:

- Lung irritation that can cause inflammation much like a sunburn;
- Wheezing, coughing, pain when taking a deep breath, and breathing difficulties during exercise or outdoor activities;
- Permanent lung damage to those with repeated exposure to ozone pollution; and
- Aggravated asthma, reduced lung capacity, and increased susceptibility to respiratory illnesses like pneumonia and bronchitis.

Particulate Matter

Particulate matter includes both aerosols and solid particles of a wide range of size and composition. Of particular concern are those particles smaller than 10 microns in size (PM10) and smaller than or equal to 2.5 microns (PM2.5). Particulate matter size refers to the aerodynamic diameter of the particle. Smaller particles are of greater concern because they can penetrate deeper into the lungs than large particles.

PM10 is generally emitted directly as a result of mechanical processes that crush or grind larger particles or from the re-suspension of dusts, most typically through construction activities and vehicular travels. PM10 generally settles out of the atmosphere rapidly and is not readily transported over large distances.

PM2.5 is directly emitted in combustion exhaust and is formed in atmospheric reactions between various gaseous pollutants including NOx, sulfur oxides (SOx), and VOCs. PM2.5 can remain suspended in the atmosphere for days and/or weeks and can be transported long distances.

The principal health effects of airborne particulate matter are on the respiratory system. Short-term exposures to high PM2.5 and PM10 levels are associated with premature mortality and increased hospital admissions and emergency room visits; increased respiratory symptoms are also associated with short-term exposures to high PM10 levels. Long-term exposures to high PM2.5 levels are associated with premature mortality and development of chronic respiratory disease. According to the USEPA, some people are much more sensitive than others to breathing PM10 and PM2.5. People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worse illnesses; people with bronchitis can expect aggravated symptoms; and children may experience decline in lung function due to breathing in PM10 and PM2.5. Other groups considered sensitive include smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive because many breathe through their mouths.

Particulate matter tends to occur primarily in the form of fugitive dust. This dust appears to be generated by both local sources and by region-wide dust during moderate to high wind episodes. These regional episodes tend to be multi-district and sometimes interstate in scope. The principal sources of dust in urban areas are from grading, construction, disturbed areas of soil, and dust entrained by vehicles on roadways.

Carbon Monoxide

Carbon monoxide is a colorless and odorless gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can cause headaches, aggravate cardiovascular disease, and impair central nervous system functions. CO concentrations can vary greatly over comparatively short distances. Relatively high concentrations are typically found near crowded intersections; along heavily used roadways carrying slow-moving traffic; and at or near ground level. Even under the most severe meteorological and traffic conditions, high concentrations of CO are limited to locations within a relatively short distance (i.e., up to 600 feet or 185 meters) of heavily traveled roadways. Overall CO emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973. CO levels in the SoCAB are in compliance with the State and federal one-hour and eight-hour standards.

Sulfur Dioxide

Sulfur oxides (SOx) constitute a class of compounds of which SO_2 and sulfur trioxide (SO_3) are of greatest importance. Ninety-five percent of pollution-related SOx emissions are in the form of SO_2. SOx emissions are typically examined when assessing potential air quality impacts of SO_2. The primary contributor of SOx emissions is fossil fuel combustion for generating electric power. Industrial processes, such as nonferrous metal smelting, also contribute to SOx emissions. SOx is also formed during combustion of motor fuels; however, most of the sulfur has been removed from fuels, greatly reducing SOx emissions from vehicles.

SO_2 combines easily with water vapor, forming aerosols of sulfurous acid (H_2SO_3), a colorless, mildly corrosive liquid. This liquid may then combine with oxygen in the air, forming the even more irritating and corrosive sulfuric acid (H_2SO_4). Peak levels of SO_2 in the air can cause temporary breathing difficulty for people with asthma who are active outdoors. Longer-term exposures to high levels of SO_2 gas and particles cause respiratory illness and aggravate existing heart disease. SO_2 reacts with other chemicals in the air to form tiny sulfate particles which are measured as PM2.5.

Lead

Lead is a stable compound, which persists and accumulates both in the environment and in animals. In humans, it affects the body's blood-forming (or hematopoietic), nervous, and renal systems. In addition, lead has been shown to affect the normal functions of the reproductive, endocrine, hepatic, cardiovascular, immunological, and gastrointestinal systems, although there is significant individual variability in response to lead exposure. Since 1975, lead emissions have been in decline due in part to the introduction of catalyst-equipped vehicles, and also due to the decline in the production of leaded gasoline. In general, an analysis of lead is limited to projects that emit significant quantities of the pollutant (i.e., lead smelters) and are not applied to transportation projects.

Air Quality Standards

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The NAAQS and California Ambient Air Quality Standards (CAAQS) currently in effect, are presented in Table 3.2-1, California and National Ambient Air Quality Standards, on the following page.

TABLE 3.2-1
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	National Standards	
			Primary[a]	Secondary[b]
O_3[c]	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM10	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary
PM2.5	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–	–
NO_2	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
SO_2	24 Hour	0.04 ppm (105 µg/m^3)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	**No National Standards**	
Sulfates	24 Hour	25 µg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)		

O_3: ozone, ppm: parts per million, µg/m^3: micrograms per cubic meter, –: No Standard; PM10: respirable particulate matter with a diameter of 10 microns or less, AAM: Annual Arithmetic Mean, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, CO: carbon monoxide, mg/m^3: milligrams per cubic meter, NO_2: nitrogen dioxide, SO_2: sulfur dioxide, km: kilometer.

[a] *National Primary Standards:* The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

[b] *National Secondary Standards:* The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2016

Regional Air Quality

The SCAQMD monitors levels of various criteria pollutants at 38 permanent monitoring stations and 5 single-pollutant source Lead (Pb) air monitoring sites throughout the air district. Table 3.2-2, Attainment Status of Criteria Pollutants in the SoCAB, below summarizes the attainment designations for the SoCAB. All of the County of Los Angeles (County) is designated as a nonattainment area for O_3, PM10, and PM2.5; portions of the County, not including the City are designated nonattainment for NO_2 and lead.

TABLE 3.2-2
ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOCAB

Pollutant	State	Federal
O_3 (1 hour)	Nonattainment	No standards
O_3 (8 hour)	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	Attainment	Attainment
Lead	No Standard	Nonattainment/Attainment[*]
All others	Attainment/Unclassified	No standards

O_3: ozone; $PM_{2.5}$: respirable particulate matter 10 microns or less in diameter; $PM_{2.5}$: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; SoCAB: South Coast Air Basin.

[a] Los Angeles County is classified nonattainment for lead; the remainder of the SoCAB is in attainment of the State and federal standards.

Source: CARB 2021a, USEPA 2021

Local Air Quality

The nearest long-term air quality monitoring site to the City of South Pasadena is the Pasadena–South Wilson Avenue monitoring station, located approximately 1.8 miles to the northeast. Pollutants measured at this monitoring station include O_3, $PM_{2.5}$, and NO_2.The most recent three years of data available at the time the air quality modeling was conducted is shown on Table 3.2-3, Local Air Quality Monitoring Summary (2019-2021), on the following page and identifies the number of days ambient air quality standards were exceeded, which is considered to be representative of the local air quality in the City.

TABLE 3.2-3
LOCAL AIR QUALITY MONITORING SUMMARY (2019-2021)

Pollutant	California Standard	National Standard	Year	Max. Level[a]	State Standard Days Exceeded[b]	National Standard Days Exceeded[b, c]
O_3 (1 hour)	0.09 ppm	None	2019	0.120	11	NA
			2020	0.163	41	NA
			2021	0.104	12	NA
O_3 (8 hour)	0.070 ppm	0.070 ppm	2019	0..098	29	24
			2020	0.116	61	60
			2021	.087	32	25
NO_2 (1 Hour)	0.18 ppm	0.100 ppm	2019	59.1	0	0
			2020	61.2	0	0
			2021	77.3	0	0
NO_2 (AAM)	0.030 ppb	0.053 ppb	2019	-	-	-
			2020	-	-	-
			2021	-	-	-
$PM_{2.5}$ (24 Hour)	None	35 µg/m^3	2019	41.8	N/A	1
			2020	67.7	N/A	2
			2021	63.6	N/A	2
$PM_{2.5}$ (AAM)	12 µg/m^3	15 µg/m^3	2019	8.7	No	No
			2020	11.9	No	No
			2021	10.7	No	No

O_3: ozone; ppm: parts per million; µg/m^3: micrograms per cubic meter; AAM: annual arithmetic mean; NO_2: nitrogen dioxide.

"–" indicates that the data are not reported or there is insufficient data available to determine the value. N/A indicates that there is no applicable standard.

State and national data may differ because of differing methods for selecting hours for averaging.

[a] California maximum levels were used.

[b] For annual averaging times, a "Yes" or "No" response is given if the annual average concentration exceeded the applicable standard.

[c] PM is measured once every 6 days. Where 2 values are shown for $PM_{2.5}$, the first is for the measured value, and the second is the estimated number of days.

Source: CARB 2021b

3.2.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

U.S. Environmental Protection Agency

The USEPA's air quality mandates are drawn primarily from the Clean Air Act (CAA), which was enacted in 1970. The most recent major amendments made by Congress were in 1990. The USEPA is responsible for setting and enforcing the NAAQS for criteria pollutants, which are shown above in Table 3.2-1. Regional air quality is defined by whether the area has attained or not attained State and federal standards, as determined by monitoring. As part of its enforcement responsibilities, the USEPA requires each State with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain and maintain the federal standards. The SIP must integrate federal, State, and local plan components and regulations to identify specific measures to reduce pollution by using a combination of performance standards and market-based programs within the SIP-identified timeframe.

State

California Clean Air Act (CCAA)

The California Clean Air Act of 1988 provides the basis for air quality planning and regulation independent of federal regulations. A major element of the Act is the requirement that local air districts in violation of the CAAQS must prepare attainment plans that identify air quality problems, causes, trends and actions to be taken to attain and maintain California's air quality standards by the earliest practicable date.

California Air Resources Board (CARB)

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for coordinating and administering both the federal and State air pollution control programs in California. In this capacity, CARB conducts research; sets the California Ambient Air Quality Standards (CAAQS), as shown in Table 3.2-1 above; compiles emission inventories; develops suggested control measures; oversees local programs; and prepares the SIP. For regions that do not attain the CAAQS, CARB requires the air districts to prepare plans for attaining the standards. These plans are then integrated into the State SIP. CARB establishes emissions standards for (1) motor vehicles sold in California; (2) consumer products (e.g., hair spray, aerosol paints, barbecue lighter fluid); and (3) various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Section 2485 of the California Code of Regulations (CCR)) places restrictions on vehicular idling. It requires that on or after February 1, 2005, any person that owns, operates, or causes to operate any diesel-fueled commercial motor vehicle with gross vehicular weight ratings of greater than 10,000 pounds must prohibit vehicle idling for more than five consecutive minutes at any location. Additionally, diesel-fueled internal combustion engine auxiliary power systems (APS) must be prohibited from operating for greater than 5 minutes at any location when within 100 feet of any property zoned for individual or multi-family housing units, schools, hotels, motels, hospitals, senior care facilities or childcare facilities.

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the CCR) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The current applicable standards are the 2022 Standards, effective January 1, 2023. The 2022 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Since using natural gas produces criteria pollutant emissions, a reduction in natural gas consumption results in a related reduction in air quality emissions. Additional discussion of the Title 24 energy efficiency standards is included in Section 3.7, Greenhouse Gas Emissions, of this Program Environmental Impact Report (PEIR).

Title 24 Green Building Standards

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential

and non-residential buildings (including buildings for retail uses, office uses, public schools, and hospitals) throughout California. The 2022 CALGreen Code was effective January 1, 2023. Development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The CALGreen Code was established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

Regional

South Coast Air Quality Management District (SCAQMD)

In the SoCAB, the SCAQMD is the agency responsible for protecting public health and welfare through the administration of federal and State air quality laws, regulations, and policies. Included in the SCAQMD's tasks are the monitoring of air pollution, the preparation of the AQMP) for the SoCAB, and the promulgation of rules and regulations. The Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization and the State-designated transportation planning agency for six counties: Riverside, San Bernardino, Los Angeles, Ventura, Imperial, and Orange. The SCAQMD and SCAG are jointly responsible for formulating and implementing the AQMP for the SoCAB. SCAG's Regional Mobility Plan and Growth Management Plan form the basis for the land use and transportation control portion of the AQMP.

Air Quality Management Plan

The Federal CAA requires states to prepare SIPs to demonstrate attainment of the NAAQS for which an area is designated as being in nonattainment. Furthermore, the CCAA requires the revision of these plans every three years to address reducing pollutant concentrations that exceed the CAAQS. The SCAQMD and Southern California Association of Governments (SCAG), in coordination with local governments and the private sector, develop the AQMP for the SoCAB to satisfy these requirements. The AQMP is the most important air management document for the SoCAB because it provides the blueprint for meeting State and federal ambient air quality standards.

The current regional plan applicable to the Project is the SCAQMD's 2022 AQMP. The SCAQMD is responsible for ensuring that the SoCAB meets the NAAQS and CAAQS by reducing emissions from stationary (area and point), mobile, and indirect sources. To accomplish this goal, the SCAQMD prepares AQMPs in conjunction with the SCAG, County transportation commissions, and local governments; develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

The 2022 AQMP was adopted on December 2, 2022, by the SCAQMD Governing Board. The 2022 AQMP evaluates integrated strategies and measures to meet the following NAAQS (SCAQMD 2022):

- 8-hour O_3 target of 80 parts per billion (ppb) by 2024, 75 ppb by 2032, 70 ppb by 2038;
- Annual PM2.5 (12 micrograms per cubic meter [$\mu g/m^3$]) by 2025;
- 1-hour O_3 (120 ppb) by 2023; and

- 24-hour PM2.5 (35 µg/m^3) by 2023.

SCAQMD Rules and Regulations

The SCAQMD adopts rules and regulations for maintaining clean air in the region. All projects are subject to SCAQMD rules and regulations in effect at the time of construction. Specific rules applicable to future development pursuant to the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs may include, but are not limited to:

- **Rule 401 – Visible Emissions.** A person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any 1 hour that is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the U. S. Bureau of Mines.
- **Rule 402 – Nuisance.** A person shall not discharge from any source whatsoever such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule do 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 is intended to reduce the amount of particulate matter entrained in the ambient air because of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust. Applicable dust suppression requirements from Rule 403 are summarized below:
    - Nontoxic chemical soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
    - Active sites shall be watered at least twice daily. (Locations where grading is to occur will be thoroughly watered prior to earthmoving.)
    - All trucks hauling dirt, sand, soil, or other loose materials shall be covered, or at least 0.6 m (2 ft) of freeboard (vertical space between the top of the load and top of the trailer) maintained in accordance with the requirements of California Vehicle Code (CVC) Section 23114.
    - Construction access roads shall be paved at least 30 m (100 ft) onto the site from the main road.
    - Traffic speeds on all unpaved roads shall be reduced to 15 mph or less.

- **Rule 1113 – Architectural Coatings.** No person shall apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in a table incorporated in the Rule. A list of low/no-VOC paints is provided at the following SCAQMD website: http://www.aqmd.gov/home/rules-compliance/compliance/vocs/architectural-coatings/super-compliant-coatings. All paints will be applied using either high volume low-pressure spray equipment or by hand application.
- **Rule 1301 – General.** This rule is intended to provide that pre-construction review requirements to ensure that new or relocated facilities do not interfere with progress in attainment of the NAAQS, while future economic growth within SCAQMD is not unnecessarily restricted. The specific air quality goal is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors. Rule 1301 also limits emission increases of ammonia, and Ozone Depleting Compounds (ODCs) from new, modified or relocated facilities by requiring the use of Best Available Control Technology (BACT).

Southern California Association of Governments (SCAG)

As discussed above, SCAG is the federally designated MPO for the Southern California region and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. In this role, SCAG reviews projects to analyze their impacts to its regional planning efforts. On June 5, 2020, SCAG's Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS includes a strong commitment to reduce emissions from transportation sources in order to improve public health and to meet the NAAQS as set forth by the CAA. The 2020–2045 RTP/SCS also includes population, housing, and employment forecasts for the City.

Although SCAG is not an air quality management agency, it is responsible for several air quality planning issues. As the designated MPO for the Southern California region, SCAG partners with local air districts by providing information and/or oversight of air quality planning documentation. Specifically, SCAG provides demographic projections as well as integrated land use, housing, employment and transportation programs, measures, and strategies for portions of the South Coast AQMP, which applies to a portion of the Project site. The local air districts develop and enforce regulations for non-vehicular sources of air pollution and coordinate with SCAG to develop and implement Transportation Control Measures (TCMs) to reduce and otherwise improve vehicular travel and associated pollutant emissions.

3.2.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse air quality impact if it would:

Threshold 3.2a: Conflict with or obstruct implementation of the applicable air quality plan;

Threshold 3.2b: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;

Threshold 3.2c: Expose sensitive receptors to substantial pollutant concentrations; and/or

Threshold 3.2d: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the State CEQA Guidelines states that the significance criteria established by the applicable air quality management district may be relied upon to make significance determinations. The SCAQMD has established significance thresholds to assess the regional and localized impacts of project-related air pollutant emissions; Table 3.2-4, South Coast AQMD Air Quality Significance Thresholds, on the following page presents the current significance thresholds applicable to the proposed Project. A project with daily emission rates below these thresholds is generally considered to have a less than significant effect on air quality.

TABLE 3.2-4
SOUTH COAST AQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds[a]		
Pollutant	**Construction**	**Operation**
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
TACs, Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO_2e for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants[b, c]		
NO_2 1-hour average annual arithmetic mean	The South Coast AQMD is in attainment; the Project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (State) 0.03 ppm (State) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	 10.4 µg/m^3 (construction)[c] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
PM2.5 24-hour average	 10.4 µg/m^3 (construction)[c] & 2.5 µg/m^3 (operation)	
SO_2 1-hour average 24-hour average	 0.25 ppm (State) & 0.075 ppm (federal – 99th percentile) 0.04 ppm (State)	
Sulfate 24-hour average	 25 µg/m^3 (State)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20.0 ppm (State) and 35 ppm (federal) 9.0 ppm (State/federal)	
Lead 30-day average Rolling 3-month average	 1.5 µg/m^3 (State) 0.15 µg/m^3 (federal)	

NOx: nitrogen oxides, lbs/day: pounds per day, VOC: volatile organic compound, PM10: respirable particulate matter with a diameter of 10 microns or less, PM2.5: fine particulate matter with a diameter of 2.5 microns or less, SOx: sulfur oxides, CO: carbon monoxide, TACs: toxic air contaminants, GHG: greenhouse gases, MT/yr CO_2e: metric tons per year of carbon dioxide equivalents, NO_2: nitrogen dioxide, ppm: parts per million, µg/m^3: micrograms per cubic meter; South Coast AQMD: South Coast Air Quality Management District

[a] Source: South Coast AQMD CEQA Handbook (South Coast AQMD 1993)
[b] Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated
[c] Ambient air quality threshold is based on South Coast AQMD Rule 403

Source: SCAQMD 2019

3.2.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.2 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

A1.2 Continue to channel Federal, State and Local transportation funds to programs, and infrastructure improvements that reduce air pollution through the promotion of walking, biking, ride-sharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies.

P1.3 Promote the use of energy-efficient vehicles.

A1.3a Continue to control and reduce air pollution emissions from vehicles owned by the City by expanding the use of alternative fuel, electric, and hybrid vehicles in City fleets.

A1.3b Promote the installation of alternative fueling stations and electrical charging stations at businesses and residences.

P1.4 Minimize the adverse impacts of growth and development on air quality and climate.

A1.4a Implement policies and actions of the Climate Action plan, adopted on December 16, 2020.

A1.4b Minimize the use of asphalt within the City and mitigate the sources of urban heat island impacts.

P3.13 Implement energy efficient retrofit improvements in existing buildings consistent with the requirements of the City's Climate Action Plan.

A3.13 Support programs to provide loans to property owners for the installation of energy efficiency improvements or renewable energy devices.

P3.14 Establish standards for the inclusion of energy efficient design and renewable technologies in all new public and private projects.

A3.14a Require all new structures or major retrofits to be pre-wired for solar panels. Encourage battery back-up systems or generators in key locations throughout the city.

A3.14b Establish clean energy "micro-grids".

A3.14c Adopt zero net energy building codes.

A3.14d Provide builders, businesses, and residents with resources and information about energy efficiency and renewable energy technologies at the Building Permit counters and on the City's website.

A3.14e Develop a Solar Action Plan to meet 50% of South Pasadena's power demand through solar by 2040 and consider implementing recommendations of "Clean Energy Pathway for South Pasadena" and "Solar in South Pasadena: First Steps".

A3.14f Electrify South Pasadena's Vehicles. Develop a city fleet alternative fuel conversion policy, and use it to promote residents to convert as well.

A3.14g Install Electric Vehicle (EV) chargers at public facilities. Encourage property owners to install EV chargers at business and multi-family locations.

P4.1 Provide safe, comfortable and convenient access to local destinations for people walking and bicycling in South Pasadena and integrate the local walking and bicycling network into the regional network to connect to adjacent jurisdictions and points beyond.

A4.1a Upgrade and enhance existing walking and bicycling facilities to support safety, comfort, and convenience, especially in Pedestrian Priority Areas and along Bicycle Priority Corridors.

A4.1b Enhance active transportation connections to and from the Metro A Line station.

A4.1c Ensure that walking facilities – including sidewalks, curb ramps, crossings, and trails – are accessible for people with physical impairments.

A4.1d Develop a signage master plan consistent with state regulations that specifies guidelines and requirements for the design of high-quality, user-friendly and attractive human-scaled signage directing people driving, walking, and bicycling to destinations and guiding them through the bicycle/pedestrian network.

A4.1e Encourage and/or require the provision of secure bicycle parking facilities at employment centers, commercial centers, recreational amenities, and civic amenities.

P4.2 Engage and educate the community to encourage people to walk and bike in South Pasadena for recreation, transportation, and health/fitness. Promote walking and biking as safe, enjoyable, convenient, and environmentally sustainable alternatives to automobile travel.

A4.2a Support bicycle and pedestrian safety education classes and programs in order to improve safety for all road users.

A4.2b Support programs that encourage South Pasadena residents, workers, and visitors to choose walking, bicycling, and other active modes of travel.

P4.3 Promote safety for all road users through compliance with – and enforcement of – traffic codes for drivers, bicyclists and pedestrians.

A4.3 Work with the South Pasadena Police Department to increase enforcement of traffic laws related to walking and bicycling.

P4.4 Ensure successful implementation of the active transportation policies and actions by developing programs and strategies for successfully implementing and funding pedestrian and bicycle projects and programs, and for maintaining pedestrian and bicycle facilities.

A4.4a Provide routine inspection and maintenance of pedestrian and bicycle facilities, including pavement repairs, restriping, maintenance of traffic control devices, landscape maintenance, and sweeping bike lanes and paths.

A4.4b Minimize disruption to pedestrians when repairing and constructing transportation facilities, and provide alternate routes when necessary.

A4.4c Evaluate the progress and effectiveness of the Active Transportation policies and actions to achieve project and program goals.

A4.4d Regularly seek funding for the design and development of active transportation projects, and ensure awareness of current regional, state, and federal funding programs.

A4.4e Coordinate with federal, state, regional, county and local agencies to fund and implement bicycle and pedestrian projects in cooperation with other nearby jurisdictions.

P4.5 Support street designs that emphasize safety and accommodate all users, including pedestrians and cyclists.

- Ensure that streets are pedestrian-oriented, with complete sidewalks, regular crosswalks, and other measures to improve pedestrian safety and comfort.
- Limit the widths of vehicular lanes in order to discourage speeding (on truck routes or streets on which public transit operates, ensure that lanes are wide enough to safely accommodate large vehicles passing one another in opposite directions, and that intersections can accommodate turns by large vehicles).

A4.5c Proceed with modifications to the "bulb-out" curb extensions on Fair Oaks. If some bulb-outs are removed as part of this process, implement alternative measures to protect pedestrians in the corridor including leading pedestrian intervals and enhanced crosswalks.

A4.5d Identify and improve the safety and efficiency of crosswalks throughout the City, consistent with the requirements of State legislation including the Americans with Disabilities Act (such as Monterey Road and Pasadena Avenue).

P4.6 Provide high-quality pedestrian and bicycle facilities to enhance the safety, comfort and convenience of people walking and bicycling in South Pasadena.

A4.6a Implement South Pasadena's Complete Streets Policy.

A4.6b Design roadways to safely accommodate all users, balancing the needs of people walking, bicycling, riding transit, and driving personal and commercial vehicles.

A4.6c Utilize roadway design/engineering best practices to ensure safe and effective pedestrian and bicycle infrastructure.

A4.6d Utilize best practices for the design of bicycle parking facilities in the public realm and at locations such as employment centers and schools.

P4.7 On streets identified as priorities for one specific mode of travel, such as bicycle routes, prioritize improvements for that mode. Ensure that bicycle lanes provide a high level of separation from traffic, using buffers, vertical elements or parked cars wherever possible.

A4.7a Proceed with implementation of Bicycle Master Plan projects.

A4.7b Update the Bicycle Master Plan to identify the appropriate locations and improvements for a citywide network of bicycle paths and facilities.

A4.7c Study the viability of adding bicycle lanes to Fair Oaks Avenue and Mission Street.

P4.8 Maintain a roadway system that provides for the efficient movement of goods and people in South Pasadena, while maintaining the community's character and quality of life.

A4.8b Require that development projects achieve no net increase in Vehicle Miles Traveled (VMT) per capita above current levels for comparable uses in the City of South Pasadena as determined in accordance with the City's Transportation Impact Analysis (TIA) Methodology (updated May 5, 2020).

P4.10 Explore options to improve transit service within South Pasadena, including City programs and/or partnerships with Metro.

A4.10 Improve transit service within South Pasadena using one of four options:

1. Expand the City's existing aial-a-ride program to serve all residents (and not just older residents);
2. Implement a circulator shuttle, funded through a public-private partnership, providing connections every 30 minutes or more often during the day to the Metro A Line station and other major destinations;
3. Partner with Pasadena to expand Pasadena Transit service to South Pasadena;
4. Initiate a partnership with Metro to pilot "microtransit" on-demand service using smartphone apps.

P4.11 Facilitate safe and improved pedestrian and bicycle travel between the Metro A Line station and major destinations.

A4.11a Study and develop a plan for sidewalk, signalization, crosswalk, bike ways, and other improvements on streets connecting the Metro A Line station with the downtown and surrounding neighborhoods (for example Mission Street at Prospect Avenue, El Centro Street between Mound and Edison Avenues, and Orange Grove Avenue at El Centro Street).

A4.11b Explore appropriate ways to improve the safety of pedestrians and cyclists at rail crossings.

P4.12 Encourage and facilitate shared-ride options include e-hailing services, carshare, and bikeshare. Increase awareness of multimodal alternatives to driving to the Metro A Line station.

A4.12 In the near term, work with Metro and private partners (carshare companies) to identify "mobility hub" improvements that could be implemented at or near the Metro A Line station, such as additional, secure parking (lockers) for bicycles, a future bikeshare station and carshare vehicles stationed in the Mission Meridian Village Parking Garage.

P6.2 Roadway designs should prioritize safety. Promote safe complete street networks that facilitate safe and comfortable walking and biking.

A6.2a Create safe and well-connected street networks for walking and biking to improve access to destinations, school zones, and other community services.

A6.2b Provide infrastructure to support safe biking.

A6.2c Teach children safe walking and biking behaviors. Implement organized walk to school days, walking school buses, and other similar events..

A6.2d Expand multi-modal mobility choices residents need to remain independent as they age.

P6.6 Reduce the prevalence of unpleasant noise and smell.

A6.6b Provide educational materials and programs that inform the public about noise and pollution risks of gas-powered outdoor maintenance and encourage use of alternative environmentally sensitive solutions.

A6.6c Enforce ordinance prohibiting use of gas-powered leaf blowers.

Downtown Specific Plan Update

P1.1 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

P1.3 Preserve, manage, and grow the downtown tree canopy.

P3.4 Encourage green projects and practices and support the inclusion of energy efficient design and renewable technologies in all new downtown public and private projects.

A3.4a Require new and/or renovated buildings to meet USGBC LEED Silver rating or equivalent and advance the City's sustainability goals.

A3.4b Incentivize sustainable living and business practices, both passive and active, that encourage energy efficiency, improve indoor air quality, and encourage water and resource conservation.

A3.4c Support solar panels on all new buildings.

A3.4d Explore opportunity to develop a clean energy micro-grids.

A3.4e Install Electric Vehicle (EV) chargers at public facilities in the Downtown area. Encourage property owners to install EV chargers at Downtown business and multifamily locations.

P4.1 Support street designs that emphasize safety and that accommodate all users, including pedestrians and cyclists.

A4.1a Ensure that streets are pedestrian-oriented, with complete sidewalks, regular crosswalks, and other measures to improve pedestrian safety and comfort such as compact corner radii, "bulb-out" sidewalk extensions at crosswalks, leading pedestrian intervals at signals, additional safety measures potentially including pedestrian-actuated signals at unsignalized crosswalks, other traffic calming measures, and increased investments in sidewalk maintenance and lighting.

P4.2 On streets identified as priorities for one mode of travel, such as bicycle routes, prioritize improvements for that mode.

A4.2a Ensure that bicycle lanes provide a high level of separation from traffic, using buffers, vertical elements, or parked cars wherever possible; and consider speed limit adjustments pursuant to Assembly Bill 43.

A.42b Proceed with implementation of Bicycle Master Plan projects.

P4.3 Reduce traffic congestion by reconfiguring outmoded interchanges and traffic signals rather than adding lanes to streets.

A4.3a Synchronize traffic signals wherever possible to optimize traffic flow at safe speeds.

A4.3b Work with Metro and the California Public Utilities Commission to reduce signal delay at the A Line crossing of Mission and Meridian while maintaining safety.

P4.4 Explore options to improve transit service within South Pasadena, including City programs, public/private partnerships, and/or partnerships with Metro.

A.4.4a Maintain the City's existing Dial-A-Ride program.

A4.4b Initiate a partnership with Metro to pilot microtransit on-demand service using smartphone apps.

P4.6 Identify important pathways for pedestrian and bicycle travel between the Metro A line station and major destinations, and make improvements to safety and comfort along these paths.

A4.6a Add an unsignalized crosswalk, with accompanying safety measures, on Mission at Prospect Avenue.

A4.6b Add a sidewalk on the north side of El Centro between Mound and Edison Avenues.

A.4.6c Reconfigure the intersection of Orange Grove Avenue and El Centro Street to require slower right turns by vehicles from southbound Orange Grove Avenue onto westbound El Centro Street.

A4.6d Over the longer term, work with Metro to explore options for grade-separation of existing Metro A Line at-grade crossings including Monterey Road/Pasadena Avenue.

P4.7 Encourage and facilitate shared-ride options include e-hailing services, carshare and bikeshare.

A4.7 In the near term, work with Metro and private partners (carshare companies) to identify "mobility hub" improvements that could be implemented at or near the station, such as additional, secure parking (lockers) for bicycles, a future bikeshare station and carshare vehicles stationed in the Mission Street/Meridian Avenue garage.

P6.2 Lead with roadway design that prioritizes safety. Promote safe networks of complete streets that facilitate safe and comfortable walking and biking.

A6.2a Repurpose Mission Street and Fair Oaks Avenue to include safe and well connected street networks for walking and biking, and to improve access to destinations and other community services.

A6.2c Augment pedestrian activity and social interaction along Mission Street; provide more sidewalk space, and provide a series of parklets distributed throughout the street.

A6.2d For blocks over 400 feet long on Mission Street, provide mid-block crossings that encourage pedestrian activity along and across the street.

A6.2e Pave and enhance Pico Alley with string lights, east of the Metro A Line station, so it becomes a gathering space as well as an important pedestrian connection from the station to the eastern blocks, without as an alternative to Mission Street.

A6.2f Pave and enhance with trees and string lights Edison Alley, behind the Rialto, so it becomes a distinct north-south pedestrian connection, connecting the Rialto to Mission Street.

P6.3 Increase infrastructure that supports biking.

A6.3a Encourage existing and new development to provide secure indoor bicycle parking in the form of indoor racks or storage rooms to ensure security and weather protection, and provide outdoor bike racks.

P7.1 Make Downtown streets safe for pedestrians and bicyclists.

A7.1a Carry out the safety enhancements recommend by the Downtown Vision for Mission Street and Fair Oaks Avenue.

A7.1b Add mid-block crossings and parklets on Mission Street.

A7.1c Amend the development codes to allow context sensitive street types.

P8.3 Promote a new, balanced traffic culture including walking and cycling for all age groups.

A8.3a Support and develop existing publicly-owned right-of-ways and streets into temporary and permanent open spaces like parklet, curb extension, mid-block crossing, sidewalk extension, shared street, and temporary open street or street park.

A7.3b Transform Mission Street and Fair Oaks Avenue into complete streets that promote safe walking and cycling.

2021–2029 Housing Element Implementation Programs

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

3.2.6 ENVIRONMENTAL IMPACTS

Threshold 3.2a: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Pursuant to the SCAQMD's CEQA Air Quality Handbook, a project would be inconsistent with the AQMP if it would:

- Create an increase in the frequency or severity of air quality violations, cause or contribute to new violations, delay attainment of air quality standards; or
- Exceed the assumptions of the AQMP.

For the first criterion, the analysis below demonstrates that construction-source and operational-source emissions have the potential to exceed the applicable regional significance thresholds for criteria pollutants.

Construction

Regional Emissions

During construction activities associated with individual projects, emissions of CO, VOCs, NO_x, SO_X, PM10, and PM2.5 would likely be released through the burning of fossil fuels in construction equipment, grading fugitive dust, asphalt paving, and the application of architectural coatings during painting activity. Because the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs identify future land uses and do not contain specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Additionally, due to the variables that must be considered when examining construction impacts (e.g., development rate, disturbance area per day, specific construction equipment and operating hours), it would be speculative to state conclusively that construction activity associated with the project would cause a significant air quality impact. Therefore, air pollutant emissions for construction activity have not been quantified in this air quality analysis. Rather, the Applicant/Developer of any future Project requiring environmental evaluation pursuant to CEQA would be required to conduct project-specific air quality analyses that include mitigation measures, as needed, to reduce any significant impacts

to the maximum extent feasible and consistent with all requirements of CEQA and the State CEQA Guidelines. In addition, for projects that are estimated to exceed the SCAQMD construction emissions significance thresholds (Table 3.3-4), all feasible mitigation measures shall be applied to minimize construction-related air quality impacts, based on project-specific air quality modeling, to the maximum extent practically and technologically feasible. Construction of future development projects have the potential to result in significant and unavoidable impacts. In that case, the preparation of a project-specific EIR would be required (pursuant to CEQA) and an analysis of alternatives and other emissions reduction measures would take place. As construction-related emissions cannot be accurately determined at this time, it is conservatively assumed in this PEIR that constriction related impacts would also be significant and unavoidable.

Local Emissions

To assist lead agencies, SCAQMD developed screening-level Localized Significance Thresholds (LSTs) in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to exceeding the most stringent applicable federal or State ambient air quality standard at the nearest residence or sensitive receptor (SCAQMD 2008). The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses. SCAQMD developed LSTs to determine if emissions of NO_2, CO, PM10, and PM2.5 generated at a project site (off-site mobile-source emissions are not included in the LST analysis) would expose sensitive receptors to substantial concentrations of criteria air pollutants. LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level analysis. The Applicant/Developer of any future project requiring environmental evaluation pursuant to CEQA would be required to conduct project-specific air quality analyses, including an LST analysis, that include mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible and consistent with all requirements of CEQA and the State CEQA Guidelines. Because the results of the LST analyses are not known at this time, implementation of future projects have the potential to result in significant impacts with respect to construction activity, and SCAQMD rules related to construction related emissions. This would also be a significant and unavoidable impact.

Operational Emissions

Operational activities associated with the Project would result in emissions of CO, VOCs, NO_x, SO_X, PM10, and PM2.5. Operation-related emissions are expected from the following sources: area sources, energy sources, mobile sources, and stationary sources.

Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. The emissions associated with architectural coatings were calculated using the CalEEMod model.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other

photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within the CalEEMod model.

Hearths/Fireplaces

The emissions associated with use of hearths/fireplaces were calculated conservatively assuming that natural gas fireplaces would be provided in single-family homes and accessory dwelling units (ADU). The Project is required to comply with SCAQMD Rule 445, which prohibits the use of wood burning stoves and fireplaces in new development. To account for the requirements of Rule 445, the unmitigated CalEEMod model estimates were adjusted to remove wood burning stoves and fireplaces.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in the CalEEMod model.

Energy Source Emissions

Electricity and natural gas are used by almost every project. Pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the City are located either outside the region or offset through the use of pollution credits (RECLAIM) for generation within the SoCAB, pollutant emissions from off-site generation of electricity are excluded from the evaluation of air quality significance and only natural gas use is considered. The emissions associated with natural gas use were calculated using the CalEEMod model.

Mobile Source Emissions (Vehicles)

A project's mobile source emissions impacts are dependent on both daily vehicle trip generation and the vehicle miles travelled (VMT). These data were obtained from calculations provided by the Project traffic consultant, Iteris, Inc. Refer to Section 3.14, Transportation, for the Project's complete transportation analysis.

Stationary Source Emissions

Operational emissions may occur from fossil-fueled emergency generators and fire pumps. As it is not known how many of these sources may be installed as part of the General Plan and DTSP Update & 2021-2029 Housing Element Implementation Programs, these emissions are not estimated in this analysis.

Estimated Operational Emissions

The estimated operational-source regional (mass) emissions for the proposed Project based on the model inputs/assumptions described above are summarized in Table 3.2-5, Estimated Operational Emissions. Consistent with Section 2.0, Environmental Setting and Project Description, the air quality analysis assumes construction and operation of 2,775 DUs and 430,000 sf of non-residential uses.

TABLE 3.2-5
ESTIMATED OPERATIONAL EMISSIONS

Source	Emissions (lbs/day)*					
	VOC	NO_x	CO	SO_x	PM10	PM2.5
Mobile sources	31	18	282	1	121	31
Area sources	92	11	181	<1	1	1
Energy sources	1	14	7	<1	1	1
Total Operational Emissions*	**124**	**41**	**470**	**1**	**123**	**33**
SCAQMD Significance Thresholds (Table 3.2-4)	*55*	*55*	*550*	*150*	*150*	*55*
Significant Impact?	**Yes**	**No**	**No**	**No**	**No**	**No**

lbs/day: pounds per day; VOC: volatile organic compound; NO_x: nitrogen oxides; CO: carbon monoxide; SO_x: sulfur oxides; PM10: respirable particulate matter 10 microns or less in diameter; PM2.5: fine particulate matter 2.5 microns or less in diameter; SCAQMD: South Coast Air Quality Management District.

Values shown are highest of summer and winter emissions.

* Some totals do not add due to rounding.

Source: SCAQMD 2019 (thresholds); see Appendix B, Air Quality and Greenhouse Gas Emissions Modeling Data, for CalEEMod model outputs.

As shown, operational emission from buildout of the Project, based on the assumptions describe above, would exceed the SCAQMD threshold for VOC. The primary source of VOC would be consumer products. Therefore, operational emissions would be significant and unavoidable.

It is noted that while emissions of criteria air pollutants can have health effects, it is not feasible to assess health effects of implementation of the Project's buildout conditions, at a program level, as part of this Draft PEIR. Such analyses are conducted on a project-specific basis and vary dependent on numerous site-specific factors. Furthermore, the operational emissions shown in Table 3.2-5 are not meant to be a precise, predictive estimate of regional air emissions over the planning horizon of the Project (i.e., 2040), but provide a generalized magnitude considering a conservative, worst-case set of parameters. Potential impacts related to emissions of TACs are discussed further below.

CO Hotspots

It has long been recognized that adverse localized CO concentrations ("hot spots") are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentrations in the Project vicinity have steadily declined.

To establish a more accurate record of baseline CO concentrations affecting the SoCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards. The busiest intersection evaluated for the 2003 "hot spot" analysis was at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000

vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).[1] At buildout of the General Plan Update, none of the study area intersections would come close to the highest daily traffic volumes generated at the busiest intersection in the CO "hot spot" analysis. Also, based on the SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SoCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. The proposed Project considered herein would not produce the volume of traffic required to generate a CO "hot spot". In addition, due to the phase-out of older vehicles and phase-in of non-emitting electric vehicles, CO emissions have further decreased since the preparation of the 2003 AQMP and would further result in reductions in CO concentrations at intersections within the City. There would be no impact related to CO hotspots.

Summarizing the above analyses, because the Project would exceed the SCAQMD's construction and operations phase CEQA thresholds the Project would have the potential to create an increase in the frequency or severity of air quality violations, cause or contribute to new violations, delay attainment of air quality standards during construction and operation. Therefore, the Project would have the potential to conflict with the first criterion for consistency with the 2022 AQMP.

For the second criterion, the 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. The AQMP is based on projections in population and employment within the SoCAB region projected by the SCAG, which are in turn based on data provided by cities and counties. Table 3.2-6, 2040 Population, Housing, and Employment Comparison shows the differences between the 2020–2045 RTP/SCS and buildout of the Project. The SCAG-provided forecast included the years 2016, 2020, 2040, 2035, and 2045, but not 2040; however, SCAG indicated the year 2040 projections could be calculated by using a linear interpolation between 2035 and 2045 data sets (Aguilar 2021).

TABLE 3.2-6
2040 DEMOGRAPHIC COMPARISON BASED ON 2020–2045 RTP/SCS

	2040 Population	2040 Households	2040 Employment
2020-2045 RTP/SCS	27,100	11,109	11,984
Project Buildout	30,083	13,245	15,678
Difference	**+2,983**	**+2,136**	**+3,694**
Sources: SCAG 2020, Aguilar 2021			

As shown in Table 3.2-6, the estimated population, household, and employment growth with buildout of the Project would exceed the projections of the 2020–2045 RTP/SCS. Therefore, the Project has the potential to conflict with the second criterion for consistency with the AQMP.

In summary, the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs have the potential to conflict with the applicable 2020 AQMP because: 1) air pollutant emissions associated with buildout of the Project could create and increase in the severity of air quality violations within the SoCAB; and 2) buildout of the Project would exceed the 2020–2045 RTP/SCS population, housing, and employment projections and consequently air emissions that are included in the 2020 AQMP.

[1] Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

Despite inconsistency with the 2020–2045 RTP/SCS growth projections, the proposed Project would support implementation of the 2020–2045 RTP/SCS goals by facilitating infill and mixed-use development and focusing growth along transportation/transit corridors. However, since the additional growth may generate emissions that would cumulatively contribute to the nonattainment designations, the Project would have the potential to conflict with the AQMP. There are no additional feasible mitigation measures to reduce this impact at the programmatic level of analysis provided in this PEIR. Therefore, this would be considered a significant and unavoidable impact.

Threshold 3.2b: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

As shown in Table 3.2-2, the SoCAB is in nonattainment for PM10, PM2.5, and O_3. The Project would contribute PM10, PM2.5, and O_3 precursors (i.e., VOC and NOx) to the region during short-term construction and long-term operational activities. As discussed above under Threshold 3.2a, construction emissions have not been quantified because the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs do not propose any specific development projects; therefore, construction-level analyses would be speculative. The Applicant/Developer of any future Project requiring environmental evaluation pursuant to CEQA would be required to conduct project-specific air quality analyses that include mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible and consistent with all requirements of CEQA and the State CEQA Guidelines. As such, individual development projects have the potential to exceed the SCAQMD construction phase thresholds. Therefore, implementation of the Project has the potential to result in significant and unavoidable direct impacts with respect to construction activity.

SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant (SCAQMD 2003). Conversely, impacts that would be directly significant would also be cumulatively significant. Because the Project's construction emissions would potentially be directly significant, construction emissions would also be potentially cumulatively considerable, and the impact are assumed to be significant and unavoidable.

Operational emissions based on buildout of the Project are estimated above in Table 3.2-5. As shown, the Project would exceed the SCAQMD threshold for VOCs, which are O_3 precursors, and would be directly significant. Therefore, the proposed Project would also result in a cumulatively considerable increase in a criteria pollutant for which the SoCAB is in non-attainment and there would be a significant and unavoidable cumulative impact associated with estimated VOC emissions.

Threshold 3.2c: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Toxic Air Contaminants

To assist the Project in the analysis of health risks associated with exposure to toxic air contaminants (TACs)—specifically diesel particulate matter (DPM)—an evaluation of health risks consistent with guidance provided by the California Air Resources Board (CARB) in their Diesel Risk Reduction Plan is utilized. It should be noted that CARB has issued advisory

recommendations for siting new sensitive land uses, such as residences, schools, daycare centers, playgrounds, or medical facilities, in proximity to sources associated with Toxic Air Contaminants (TACs), these are shown in Table 3.2-7, California Air Resource Board Advisory Recommendations.

TABLE 3.2-7
CALIFORNIA AIR RESOURCE BOARD ADVISORY RECOMMENDATIONS

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	• Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	• Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). • Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Refineries	• Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	• Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	• Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. • Do not site new sensitive land uses in the same building with perc dry cleaning operations.
Gasoline Dispensing Facilities	• Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

Note: These recommendations are advisory. Land use agencies must balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.
Source: CARB 2005

CARB recommends performing site-specific evaluations when possible; however, since specific information regarding building locations, loading docks, and other uses is not currently available, it should be noted that a more detailed evaluation of health risks associated with specific land uses for this project would be speculative at this time. It is recommended that when such information is available, a more detailed environmental assessment should be prepared to determine the precise buffer zones necessary.

The use of CARB recommendations is applicable to siting of Project uses as well as the potential for Project uses to expose other receptors to TACs. With respect to project site TAC exposure from vehicles on the SR-110 freeway, the 2019 annual average daily traffic volumes (AADT) on SR-110 in South Pasadena ranged from 43,500 to 80,000 vehicles (Caltrans 2021). The average number of trucks on SR-110 ranged from 331 to 935, or 0.76 percent of the total volume (Caltrans 2021). The USEPA transportation conformity procedures require PM2.5 and PM10 hot-spot analyses to be performed for projects of air quality concern (POAQC). A POAQC would be a facility with 125,000 AADT and where at least 8 percent of the traffic is comprised of diesel trucks, i.e., at least 10,000 trucks per day (USEPA 2015). The current total and truck volumes are substantially less than those indicated by the USEPA as a trigger for detailed analysis.

Consistent with CARB guidance, it is recommended that site-specific evaluation be conducted prior to the siting of any sensitive land use in proximity to a land use that has the potential to emit TACs. Potential residential units that would be proposed in parcels in the northernmost portion of the DTSP focus areas and nearby areas have the potential to be located along the SR-110 where it traverses the City. Although not required under CEQA, the City shall require that the Applicants/Developers of individual future projects that would include sensitive land uses within 500 feet of SR-110 have a health risk assessment (HRA) prepared and that measures are included in the project to minimize exposure to TACs. With implementation of MM AQ-1, there would be a less than significant impact related to project site exposure to TACs. The proposed Project entails the development of residential, commercial, and office uses. These land uses are not listed by CARB as land uses that have a high potential for the generation of TACs due to the lack of diesel emissions or other TACs. Most of the emissions occurring within the Project's land uses are from the combustion of gasoline for transportation which is not considered by CARB to result in substantial levels of TACs. As such, Project related land uses are not considered to result in significant impacts for TACs to nearby land uses for the operations phase of the analysis.

For the construction phase of the Project, the totality of the Project would be developed with a multitude of individual construction projects occurring within different locations and time periods. The development of each individual construction project is decided by each individual developer and cannot be known at this time. TACs emitted during construction activities are expected to occur at various points both geographically and temporally. As such, it cannot be determined whether there would be TAC emissions that exceed SCAQMD significance thresholds. There is a potential for exceedance of the SCAQMD thresholds for TAC emissions during the construction phase of an individual project. As such, it is conservatively assumed that the proposed Project may result in a significant impact relative to TACs emitted during the construction phase. TACs emissions would be evaluated in the CEQA document for each project that comprise the General Plan update. Mitigation measures will be recommended within each respective document if it is determined that there is a potential significant impact related to TACs.

Threshold 3.2e: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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 propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential sources of operational odors generated by the Project would include disposal of miscellaneous commercial refuse, which occurs in the existing condition. Consistent with City requirements, all Project-generated refuse would be stored in

covered containers and removed at regular intervals in compliance with solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on-site. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances. Therefore, the Project would not create or result in objectionable odors affecting a substantial number of people. There would be no impact, and no mitigation is required.

3.2.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Cumulative air quality impacts are considered in terms of project contributions to air pollution levels in the San Gabriel Valley and the SoCAB. As stated above, SCAQMD's policy with respect to cumulative impacts associated with the above-referenced pollutants and their precursors is that impacts that would be directly less than significant on a project level would also be cumulatively less than significant (SCAQMD 2003). Conversely, impacts that would be directly significant would also be cumulatively significant.

Construction-related (Short-Term) Cumulative Impacts

As analyzed in Threshold 3.2b, which addresses cumulative impacts, construction activities resulting from the implementation of the General Plan and DTSP Update & 2021-2029 Housing Element Implementation Programs would have the potential to be cumulatively significant. The Applicant/Developer of any future Project requiring environmental evaluation pursuant to CEQA would be required to conduct project-specific air quality analyses that include mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible and consistent with all requirements of CEQA and the State CEQA Guidelines. However, individual development projects would have the potential to exceed the SCAQMD construction phase thresholds. Therefore, Project construction emissions are determined to be cumulatively significant and unavoidable.

Operational (Long-Term) Cumulative Impacts

As analyzed in Threshold 3.2b, which addresses cumulative impacts, future development pursuant to the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in direct and cumulatively significant and unavoidable long-term regional air quality impact related to CO emissions.

Sensitive Receptors

Future development pursuant to the proposed General Plan and DTSP Update & 2021-2029 Housing Element Implementation Programs would not create CO hotspots but may locate TACs near sensitive receptors, specifically, the potential housing and development sites proximate to the SR-110. MM AQ-1 requires the preparation of an HRA if individual future projects that would include sensitive land uses within 500 feet, and, if necessary, the inclusion of design features that reduce the exposure to DPM by future residents to a less than significant level. Thus, the proposed Project would have a less than significant impact related to TACs. However, the geographic extent of the area in the City that has the potential for sensitive land uses near the SR-110 is small, particularly in comparison to the geographic coverage of land near freeways throughout the SoCAB. Also, with MM AQ-1, the Project-related potential for TAC exposure would

be less than significant. Thus, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not have a cumulatively considerable contribution to exposure of sensitive receptors to TACs in the San Gabriel Valley and SoCAB.

Objectionable Odors

Future development pursuant to the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not create or expose people to significant objectionable odors. Thus, the proposed Project would not contribute to cumulative odor impacts.

3.2.8 MITIGATION MEASURES

MM AQ-1 The Applicant/Developer for residential land use projects in the City within 500 feet of a major sources of toxic air contaminants (TACs) (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 100,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall conduct and submit a health risk assessment (HRA) to the City of South Pasadena Community Development Department. The HRA shall be prepared in accordance with policies and procedures of CEQA and the SCAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM10 concentrations exceed 2.5 µg/m3, PM2.5 concentrations exceed 2.5 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the Applicant/Developer shall be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms, prior to issuance of a grading permit. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters (e.g., MERV 12 or better).

If the HRA cannot demonstrate that the acceptable risk level can be achieved, then no residential land uses may be developed within 500 feet of the TAC source.

3.2.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

AQMP Consistency

Significant and unavoidable impact at both a program and cumulative level.

Construction Emissions (Regional)

Significant and unavoidable at both a program and cumulative level.

Construction Emissions (Local)

Significant and unavoidable at a program level; less than significant impact at a cumulative level.

Operational Emissions

Significant and unavoidable impact at both a program and cumulative level.

CO Hotspot

Less than significant impact at both a program and cumulative level.

Toxic Air Contaminants

Less than significant impact at both a program and cumulative level.

Odors

No impact at both a program and cumulative level.

3.2.10 REFERENCES

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3.3 BIOLOGICAL RESOURCES

3.3.1 METHODOLOGY

This section analyzes potential impacts to biological resource associated with implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs. The Project would apply to the entire City of South Pasadena (City); however, the majority of projected growth is within the five focus areas and along arterial roadways but also accommodates increased housing opportunities within existing residential neighborhoods, as described in Section 2.0, Environmental Setting and Project Description. However, most existing land uses in the City are not expected to change substantively, and new development is anticipated to occur largely as infill redevelopment or development. This section concentrates on these areas of the City that would be most affected by the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, although effects on the City as a whole are also considered. Information in this section is based primarily on review of literature, existing regulations, and current aerial photographs of the City. Based on a literature review and through regional familiarity with the natural resources within the study area, Psomas biologists provided the impact analysis and proposed mitigation set forth in this section. Specific sources of information used are cited within the analysis below.

3.3.2 EXISTING CONDITIONS

Environmental Setting

The City of South Pasadena is nearly built out; thus, the majority of plant and animal habitats are located within urban environments with non-native and ornamental landscaping. Other vegetated or otherwise open areas include parks distributed throughout the City, along the Arroyo Seco (drainage feature), and large tracts of vacant land along steep hillsides in residential areas. The Arroyo Seco generally runs from north to south along the northwestern boundary of the City. This portion of the stream is concrete-lined with no native substrate. The vegetation along the Arroyo Seco is mostly comprised of ornamental trees, which are located above the manufactured, reinforced banks of the stream. Elevations within the City range from approximately 530 feet above mean sea level (amsl) to 910 feet amsl.

Open Space Areas

Outdoor recreation areas in the City are concentrated along the Arroyo Seco, including the Arroyo Park, Arroyo Woodland and Wildlife Nature Park, and the Arroyo Seco Golf Course. Additional outdoor recreation areas include Garfield Park in the northeastern portion of the City, and other smaller parks located elsewhere throughout the City. Although the vegetation in these areas consists mainly of non-native ornamental landscaping, many native trees exist including coast live oaks (*Quercus agrifolia*) and western sycamores (*Platanus racemosa*). These outdoor recreation areas are part of the City's network of open space; however, they have been specifically developed for public access and public use, such as for organized sporting activities, bike riding, or bird watching. Other portions of the City contain areas of open space not explicitly designated for public access. These areas are vacant, naturally vegetated, and mainly found in the southwestern portion of the City, including the large area referred to as Altos de Monterey. The vacant, naturally vegetated open space areas generally support a variety of both native vegetation, such as sugarbush (*Rhus ovata*) and California buckwheat (*Eriogonum fasciculatum*), and non-native vegetation, such as pepper tree (*Schinus* spp.) and eucalyptus (*Eucalyptus* spp.).

Wildlife

While the majority of the City is developed, the local parks and vacant parcels provide some patches of wildlife habitat. The following discussion is intended to provide a general description of wildlife species that may be expected to occur within the City, particularly the collective developed and undeveloped open space areas.

It is noted that although urban environments typically offer less suitable habitat for wildlife compared to undeveloped areas, they do offer foraging and cover resources and are thus not always unsuitable for all species (Melles et. al. 2003). A few studies on birds in low-density residential areas have shown that these areas may have potential for land management practices enhancing the value of these areas for birds (DeGraaf 1991; Blair 1996). However, vegetation is invariably altered with urbanization. Suburban areas rarely include the full complement of vertical strata found in natural forests (Beissinger and Osborne 1982), and native plant species are often removed or replaced by exotic ornamentals (Rosenberg et. al. 1987, Blair 1996). In these environments, canopy cover becomes an important factor in biodiversity (Johnson 1988). The presence and patch size of remnant native vegetation is another important factor (Chace and Walsh 2004, Emlen, 1974; Mills et. al. 1989). There is often a strong positive correlation between the volume and structure of native vegetation and native bird diversity and species richness (Emlen 1974; Mills et. al. 1989). Native birds respond positively with native vegetation density, while non-native species respond positively to exotic plant biomass (Mills et. al. 1989).

The City of South Pasadena contains a high percentage of tree canopy cover, and many areas with a high percentage of native tree canopy due to the presence of a large number of coast live oak trees. In addition, the City's tree preservation ordinance ensures the persistence of tree canopy through impact avoidance and tree replacement requirements. As a result, urban canopies of the City are expected to support local populations of many native bird species.

Most of the drainage features within the City do not contain water year-round, with the occasional exception of the Arroyo Seco. No native fish species are expected to reside in the Arroyo Seco proximate to the City because of lack of suitable habitat; however, the introduced western mosquitofish (*Gambusia affinis*) is expected to occur.

One common amphibian species expected to occur in the Arroyo Seco is the Pacific treefrog (*Pseudacris regilla*). Undeveloped, naturally vegetated open space areas are expected to support common reptile species, including, but are limited to, western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), southern alligator lizard (*Elgaria multicarinata*), western skink (*Plestiodon* [*Eumeces*] *skiltonianus*), gopher snake (*Pituophis catenifer*), coachwhip (*Masticophis flagellum*), common kingsnake (*Lampropeltis getula*), and western rattlesnake (*Crotalus oreganus*).

Various bird species are expected to occur in the trees and open space areas throughout the City, including, but are limited to, native species such as red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), barn owl (*Tyto alba*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), acorn woodpecker (*Melanerpes formicivorus*), black phoebe (*Sayornis nigricans*), western scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), spotted towhee (*Pipilo maculates*), California towhee (*Pipilo crissalis*), song sparrow (*Melospiza melodia*), house finch (*Carpodacus mexicanus*), lesser goldfinch (*Carduelis psaltria*), dark-eyed junco (*Junco hyemalis*), Cooper's hawk (*Accipiter cooperii*), great horned owl (*Bubo virginianus*), and band-tailed pigeon (*Patagioenas fasciata*). Introduced bird species expected to occur in the City

include, but are limited to, rock pigeon (*Columba livia*), European starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), red-whiskered bulbul (*Pycnotus jocosus*), parrots (*Amazona* sp.), Indian peafowl (*Pavo cristatus*) and parakeets (*Brotogeris chiriri* and *Psittacara* sp.). These non-native species were introduced into the region many years ago and have developed stable breeding populations. Native and non-native bird species are also expected to occur within developed areas of the City particularly where trees are abundant. Mammal species expected to occur in most open space areas of the City include, but are not limited to, desert cottontail (*Sylvilagus audubonii*), California ground squirrel (*Spermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), canyon bat (*Parastrellus hesperus*), and coyote (*Canis latrans*). Mammal species expected to occur throughout much of the City, including the more developed areas, include introduced species such as Virginia opossum (*Didelphis virginiana*), fox squirrel (*Sciurus niger*), and black rat (*Rattus rattus*); and native species such as raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), and Yuma bat (*Myotis yumanensis*).

Wildlife Movement

Wildlife movement activities usually fall into one of three movement categories: (1) dispersal (e.g., juvenile animals from natal areas or individuals extending range distributions); (2) seasonal migration; and (3) movements related to home range activities (e.g., foraging for food or water, defending territories, or searching for mates, breeding areas, or cover). A number of terms such as "wildlife corridor", "travel route", "habitat linkage", and "wildlife crossing" have been used in various wildlife movement studies to refer to areas in which wildlife move from one area to another.

Wildlife corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, transitions in vegetation, or human disturbance. This is exacerbated by fragmentation of undeveloped, naturally vegetated open spaces due to urbanization that creates isolated "islands" of wildlife habitat. In the absence of linkages that allow movement between areas of suitable habitat, various studies have concluded that some wildlife species—especially larger and more mobile mammals—will not likely persist over time in fragmented or isolated habitat because the fragmentation prohibits the immigration of new individuals and genetic information (MacArthur and Wilson 1967; Soule 1987; Harris and Gallagher 1989; Bennett 1990).

Corridors mitigate the effects of this fragmentation by (1) allowing animals to move between areas of remaining habitat, thereby permitting depleted populations to be replenished and promoting genetic exchange; (2) providing escape routes from fire, predators, and human disturbances, thus reducing the risk that catastrophic events, such as fire or disease, will result in population or local species extirpation; and (3) serving as travel routes for individual animals as they move in their home ranges in search of food, water, mates, and other necessary resources (Noss 1983; Fahrig and Merriam 1985; Simberloff and Cox 1987; Harris and Gallagher 1989).

The City does not border any large, naturally vegetated open space area, such as the San Gabriel Mountains or other portions of the Angeles National Forest, and the City consists mostly of developed areas. Small areas of vacant, naturally vegetated open space occur in the southwestern portion of the City, which has some connectivity to additional open space areas located further to the south. However, collectively these open space areas are not substantial in size and are enclosed on all sides by urban development. Therefore, these open space areas are not part of a larger, regional network of connected habitats or wildlife corridor.

The Arroyo Seco is a linear drainage feature that extends from the Los Angeles River to the San Gabriel Mountains; however, it does not consistently contain suitable vegetation, cover, or food

resources typical of wildlife movement corridors. The Arroyo Seco is likely to support local movement for local populations of common wildlife and may still provide limited passage for regional movement of some urban-tolerant wildlife species, such as coyotes. Therefore, although the drainage may allow for some limited regional wildlife movement, it does not constitute high quality travel routes, wildlife corridors, or wildlife crossings.

Special Status Biological Resources

Special status biological resources include plant and wildlife species that have been afforded special status and/or recognition by federal and State resource agencies, as well as private conservation organizations. In general, the principal reason an individual taxon (i.e., species, subspecies, or variety) is given such recognition is the documented or perceived decline or limitations of its population size, geographic range, and/or distribution resulting in most cases from habitat loss. In addition, special status biological resources include jurisdictional drainages and their riparian vegetation. Sources used to determine the special status of biological resources are as follows:

- ***Plants:*** the California Native Plant Society's (CNPS') Electronic Inventory of Rare and Endangered Vascular Plants of California (CNPS 2021a); the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB) (CDFW 2021a); various Federal Register notices from the U.S. Fish and Wildlife Service (USFWS) regarding listing status of plant species; and the CDFW's List of Special Vascular Plants, Bryophytes, and Lichens (CDFW 2021b).
- ***Wildlife:*** the CNDDB (CDFW 2021a); various Federal Register notices from the USFWS regarding listing status of wildlife species; and the CDFW's List of Special Animals (CDFW 2021c).

A federally listed Endangered species is a species facing extinction throughout all or a significant portion of its geographic range. A federally listed Threatened species is a species likely to become Endangered within the foreseeable future throughout all or a significant portion of its range. The presence of any federally listed Threatened or Endangered species on an area proposed for development leads to a California Environmental Quality Act (CEQA) determination of "significance" and, for wildlife or where there is a federal nexus, for plants, requires consultation with USFWS, particularly if development would result in "take" of the species or its habitat.

Federally listed "Proposed" species are those officially proposed by the USFWS for addition to the federal Threatened and Endangered species lists. Because species may become listed as Threatened or Endangered prior to or during implementation of a project, they are treated here as though they are listed species.

The State of California considers an Endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A Threatened species is a species in such small numbers throughout its range that it is likely to become an Endangered species in the near future in the absence of special protection or management. A Rare species is one present in such small numbers throughout its range that it may become Endangered if its present environment worsens. The Rare species designation applies to California native plants listed prior to the California Endangered Species Act (CESA). State-listed Threatened and Endangered species are protected against take unless an incidental take permit is obtained from the resource agencies.

California Species of Special Concern is an informal designation used by the CDFW for some declining wildlife species that are not State candidates for listing. This designation does not

provide legal protection but signifies that these species are recognized as special status by the CDFW. In recent years, the CDFW has downgraded some species into the Watch List category.

Species that are California Fully Protected and Protected include those protected by special legislation for various reasons, such as the mountain lion and white-tailed kite. Fully Protected species may not be taken or possessed at any time. California Protected species include those species that may not be taken or possessed at any time except under special permit from the CDFW issued pursuant to the *California Code of Regulations* (Title 14, Sections 650 and 670.7) or Section 2081 of the *California Fish and Game Code*.

Special Plant and Special Animal are general terms that refer to all the species the CNDDB is interested in tracking, regardless of their legal or protection status. This term includes species designated as any of the above terms but also includes species that (1) may be considered biologically rare, restricted in distribution, and/or declining throughout their range; (2) are on the periphery of their range and are threatened with extirpation in California; (3) are associated with special status habitats; or (4) are considered by other State or federal agencies or private organizations to be sensitive or declining.

Species of Local Concern are those that have no official status with the resource agencies but are being watched because there is either a unique population in the region or the species is declining in the region.

The California Rare Plant Rank (CRPR), formerly known as CNPS List, is a ranking system by the Rare Plant Status Review group (which consists of over 300 botanical experts from the government, academia, non-governmental organizations, and the private sector) and is managed by the CNPS and the CDFW (CNPS 2021b). A CRPR summarizes information on the distribution, rarity, and endangerment of California's vascular plants. Plants with a CRPR of 1A are presumed extinct because they have not been seen in the wild for many years. Plants with a CRPR of 1B are Rare, Threatened, or Endangered throughout their range. Plants with a CRPR of 2A are presumed extirpated from California but are more common elsewhere. Plants with a CRPR of 2B are considered Rare, Threatened, or Endangered in California, but are more common elsewhere. Plants with a CRPR of 3 require more information before they can be assigned to another rank or rejected; this is a "review" list. Plants with a CRPR of 4 are of limited distribution or are infrequent throughout a broader area in California; this is a "watch" list. The Threat Rank is an extension that is added to the CRPR to designate the plant's endangerment level. An extension of .1 is assigned to plants that are considered "seriously threatened" in California (i.e., over 80 percent of the occurrences are threatened or have a high degree and immediacy of threat). Extension .2 indicates the plant is "fairly threatened" in California (i.e., between 20 and 80 percent of the occurrences are threatened or have a moderate degree and immediacy of threat). Extension .3 is assigned to plants that are considered "not very threatened" in California (i.e., less than 20 percent of occurrences are threatened or have a low degree and immediacy of threat or no current threats are known). The absence of a threat code extension indicates that this information is lacking for the plant(s) in question.

Habitat suitable for native wildlife species in the City is limited to the native vegetation and soils in the undeveloped open space areas, and the primarily ornamental vegetation in developed areas. While native vegetation, most notably oak trees, is present within developed areas, non-native ornamental species predominate. Habitat suitable for native plant species is restricted to the undeveloped, naturally vegetated open space areas. Two special status wildlife species, Cooper's hawk (a Watch List species) and western mastiff bat (*Eumops perotis californicus*)(a California Species of Special Concern), have low potential to occur in large trees and dense

ornamental woodland areas located throughout the City. No other sensitive or special status plant or wildlife species has potential to occur in the ornamental vegetation associated with the developed areas. The undeveloped, naturally vegetated open space areas have potential to support various sensitive plant and wildlife species.

Jurisdictional Resources

Wetlands and permanent or intermittent drainages, creeks, and streams are generally subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (CWA). By USACE definition, all aquatic or riverine habitats between the "ordinary high water mark" of rivers, creeks, and streams are considered "Waters of the U.S." and may fall under USACE jurisdiction. If adjacent wetlands occur, the jurisdictional limits extend beyond the ordinary high water mark to the outer edge of the wetlands. The USACE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency or duration to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (Environmental Laboratory 1987). The presence and extent of wetland areas are normally determined by examining the vegetation, soils, and hydrology of a site. The USACE definition of wetlands requires that all three wetland identification parameters be met.

Streambeds are also subject to CDFW regulation under Sections 1600 et. seq. of the *California Fish and Game Code*. A stream is defined under these regulations as a body of water that flows at least periodically or intermittently through a bed or channel having banks and that supports fish or other aquatic life. This definition includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation. The CDFW jurisdiction typically extends to the edge of the riparian vegetation canopy. In addition, groundwater, surface water, and wetlands fall under Regional Water Quality Control Boards (RWQCB) jurisdiction.

Jurisdictional resources within the City of South Pasadena are mostly confined to concrete-lined drainages with no associated vegetation. The concrete-lined drainages across the City are numerous and disperse. The vacant naturally vegetated open space areas are mostly located in steep, upland areas with little potential to support jurisdictional resources.

3.3.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Endangered Species Act

The Federal Endangered Species Act of 1973 (FESA) protects plants and animals that the government has listed as "Endangered" or "Threatened". A federally listed species is protected from unauthorized "take", which is defined in the FESA as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or attempt to engage in any such conduct". All persons are presently prohibited from taking a federally listed species unless and until (1) the appropriate Section 10(a) permit has been issued by the USFWS or (2) an Incidental Take Statement is obtained as a result of formal consultation between a federal agency and the USFWS pursuant to Section 7 of the FESA and the implementing regulations that pertain to it (50 *Code of Federal Regulations* [CFR] 402). "Person" is defined in the FESA as an individual, corporation, partnership, trust, association, or any private entity; any officer, employee, agent, department or instrument of the Federal government; any State, Municipality, or political subdivision of the State; or any other entity subject to the jurisdiction of the United States. An Applicant for future development projects is a "person" for purposes of the FESA.

Section 401 and 404 of the Clean Water Act of 1972 (33 United States Code 1251 et seq.)

Section 404 of the Clean Water Act (CWA, 33 USC 1251 et. seq.) regulates the discharge of dredged or fill material into "Waters of the U.S.", including wetlands. "Waters of the U.S." include certain inland waters, lakes, rivers, streams, and their tributaries under certain circumstances. The USACE is the designated regulatory agency responsible for administering the 404-permit program and for making jurisdictional determinations. This permitting authority applies to all "Waters of the U.S." where the material has the effect of (1) replacing any portion of "Waters of the U.S." with dry land or (2) changing the bottom elevation of any portion of "Waters of the U.S.". These fill materials would include sand, rock, clay, construction debris, wood chips, and materials used to create any structure or infrastructure in the "Waters of the U.S.". Dredge and fill activities are typically associated with development projects; water-resource related projects; infrastructure development and wetland conversion to farming; forestry; and urban development.

Under Section 401 of the CWA, an activity requiring a USACE Section 404 permit must obtain a State Water Quality Certification (or waiver thereof) to ensure that the activity will not violate established State water quality standards. The U.S. Environmental Protection Agency (USEPA) is the federal regulatory agency responsible for implementing the CWA. However, the SWRCB, in conjunction with the nine RWQCBs, has been delegated the responsibility for administering the Section 401 water quality certification program.

The RWQCB is the primary agency responsible for protecting water quality in California through the regulation of discharges to surface waters under the CWA and the California Porter-Cologne Water Quality Control Act, discussed further below. The RWQCB's CWA jurisdiction extends to all "Waters of the U.S.". Section 401 requires the RWQCB to provide "certification that there is reasonable assurance that an activity which may result in the discharge to 'waters of the U.S.' will not violate water quality standards". Water Quality Certification must be based on a finding that the proposed discharge will comply with water quality standards, which contain numeric and narrative objectives that can be found in each of the nine RWQCB's Water Quality Control Plans.

Migratory Bird Treaty Act

Pursuant to the Migratory Bird Treaty Act (MBTA) of 1918, federal law prohibits the taking of migratory birds, their nests, or their eggs (16 *United States Code* Section 703), except as allowed by permit pursuant to 50 CFR 21. The statute states:

> Unless and except as permitted by regulations made as hereinafter provided in this subchapter, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill...any migratory bird, any part, nest, or egg of any such bird...included in the terms of the [Migratory Bird] conventions.

In 1972, the MBTA was amended to include protection for migratory birds of prey (e.g., raptors).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act provides for the protection of the bald eagle (*Haliaeetus leucocephalus*) and the golden eagle (*Aquila chrysaetos*) by prohibiting, except under certain specified conditions, the taking, possession, and commerce of such birds. The 1972 amendments increased penalties for violating provisions of the Act and strengthened other enforcement measures. A 1978 amendment authorized the Secretary of the Interior to permit the taking of golden eagle nests that interfere with resource development or recovery operations.

State

California Endangered Species Act

Pursuant to CESA and Section 2081 of the *California Fish and Game Code,* an incidental take permit from the CDFW is required for projects that could result in the take of a State-listed Threatened or Endangered species. Under the CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species, but the definition does not include "harm" or "harass", as the federal act does. As a result, the threshold for a take under the CESA is higher than that under the FESA. A CDFW-authorized Incidental Take Permit under Section 2081(b) is required when a project could result in the take of a State-listed Threatened or Endangered Species. The application for an Incidental Take Permit under Section 2081(b) has a number of requirements, including the preparation of a conservation plan, generally referred to as a Habitat Conservation Plan.

California Fish and Game Code

Section 1602

State law confers upon the CDFW the trustee responsibility and authority for the public trust resource of wildlife in California. The CDFW may play various roles under the CEQA process. By State law, the CDFW has jurisdiction over the conservation, protection, and management of the wildlife, native plants, and habitat necessary to maintain biologically sustainable populations. The CDFW shall consult with lead and responsible agencies and shall provide the requisite biological expertise to review and comment upon environmental documents and impacts arising from project activities.

As a trustee agency, the CDFW has jurisdiction over certain resources held in trust for the people of California. Trustee agencies are generally required to be notified of CEQA documents relevant to their jurisdiction, whether or not these agencies have actual permitting authority or approval power over aspects of the underlying project (14 *California Code of Regulations* Section 15386). The CDFW, as a trustee agency, must be notified of CEQA documents regarding projects involving fish and wildlife of the state as well as Rare and Endangered native plants, wildlife areas, and ecological reserves. Although, the CDFW cannot approve or disapprove a project since it is a trustee agency, lead and responsible agencies are required to consult with them. The CDFW, as the trustee agency for fish and wildlife resources, shall provide the requisite biological expertise to review and comment upon environmental documents and impacts arising from project activities and shall make recommendations regarding those resources held in trust for the people of California (*California Fish and Game Code*, Section 1602).

Sections 1600–1616

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California that support wildlife resources and/or riparian vegetation are subject to CDFW regulations, pursuant to Section 1600 through Section 1603 of the *California Fish and Game Code*. Under Section 1602, it is unlawful for any person to substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any river, stream, or lake designated by CDFW as waters within their jurisdiction, nor can a person use any material from streambeds without first notifying the CDFW of such activity. For a project that may affect stream channels and/or riparian vegetation regulated under Sections 1600 through 1603, CDFW authorization is required in the form of a Streambed Alteration Agreement.

Birds of Prey and Migratory Birds

Sections 3503 and 3503.5 of the *California Fish and Game Code* makes it unlawful to take, possess, or destroy the nests and eggs of birds of prey.

Section 3513 of the *California Fish and Game Code* duplicates the federal protection of migratory birds and prohibits the taking and possession of any migratory nongame bird, as designated in the MBTA.

California Porter-Cologne Water Quality Control Act

Pursuant to the California Porter-Cologne Water Quality Control Act, the SWRCB and the nine RWQCBs may require permits (known as waste discharge requirements [WDRs]) for the fill or alteration of "waters of the State". The term "waters of the State" is defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]). The State and Regional Boards have interpreted their authority to require WDRs to extend to any proposal to fill or alter "waters of the State", even if those same waters are not under USACE jurisdiction. Pursuant to this authority, the State and Regional Boards may require the submission of a "report of waste discharge" under Section 13260, which is treated as an application for WDRs.

Local

City of South Pasadena Tree Ordinance

Chapter 34, "Trees and Shrubs", of the City of South Pasadena Municipal Code (SPMC) contains regulations protecting trees within the City, referred to herein as the tree ordinance or tree preservation ordinance. The SPMC regulates adverse effects to the following groups of trees once they are considered mature or significant: trees in the oak (*Quercus* spp.) genus, trees native to southern California, and heritage trees as determined by the tree's historical value. A mature tree has a trunk diameter (or collective diameter of multitrunked trees) of at least four inches where the trunk is four feet above grade. A significant tree has a diameter of at least one foot at four feet above grade. The City regulates effects on these trees by requiring a permit prior to any significant trimming, or prior to tree relocation or removal. Significant trimming is defined as removing greater than 20 percent (or greater than 10 percent of oak trees or native tree species) of the live foliage within one year. No new structure shall be located nor shall any construction requiring a permit occur within six feet of the trunk of a significant or heritage tree.

The SPMC further states that City permission must be granted prior to removal of any tree regardless of size or classification that is within a parkway, or part of a watershed, erosion control, or wildlife habitat. All applications for tree removal shall also include submission of a tree plan. Any subsequent approval by the City is discretionary and could be subject to conditional requirements, including planting of replacement trees, posting of bonds ensuring the success of replacement trees, and review of the tree plan by an International Society of Arboriculture certified arborist at the cost of the applicant.

3.3.4 THRESHOLDS OF SIGNIFICANCE

The criteria for determining significant impacts on biological resources were developed in accordance with the State CEQA Guidelines. Section 15065(a) of the State CEQA Guidelines states that a project may have a significant effect on the environment if "…the project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat

of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare, or threatened species". An evaluation of whether an impact on biological resources would be significant must consider both the resource itself and how that resource fits into a regional or local context. Significant impacts would be those that would diminish or result in the loss of an important biological resource or those that would obviously conflict with local, State, or federal resource conservation plans, goals, or regulations. Impacts are sometimes locally adverse but not significant because, although they would result in an adverse alteration of existing conditions, they would not substantially diminish or result in the permanent loss of an important resource on a population- or region-wide basis.

The following significant criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse biological resources impact if it would:

Threshold 3.3a: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;

Threshold 3.3b: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;

Threshold 3.3c: Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

Threshold 3.3d: 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;

Threshold 3.3e: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or

Threshold 3.3f: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

3.3.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.1 Maximize the interrelationship between the City's natural and built infrastructure to benefit people, wildlife and the economy.

A1.1a Develop an overarching Green Infrastructure Framework.

A1.1b Create an Inter-agency Partnership between different disciplines, such as biologists, ecologists, and landscape architects to resolve competing interests.

A1.1c Prepare Design and Maintenance Standards for consistent citywide implementation.

A1.1e Carry out demonstration projects that are simple, short-term, and low-cost solutions with remarkable impacts on the natural environment.

P1.5 Promote integration of Green Infrastructure into storm water management systems.

A1.5h Establish programs to promote the use of green roofs, bioswales, pervious materials for hardscape, and other stormwater management practices to reduce water pollution.

A1.5i Establish design standards for the City rights-of-way including street tree planting and design the incorporates filtration and water retention.

P1.6 Preserve, manage, and grow the tree canopy.

A1.6 Adopt an Urban Forest Management Plan.

P7.4 Minimize risk to life and property from brushfires.

A7.4a Require fire-resistant building materials for all structures in hillside areas and encourage use of fire resistant landscaping.

Policy P8.1 Expand parkland inventory to strive for the standard of 5 acres/1,000 residents.

A8.1a Procure a linear park easement from Edison.

A8.1b Consider the feasibility of consolidating individual islands at the intersection of Huntington Drive and Fair Oaks Avenue into a park without impacting the orderly flow of traffic.

A8.1c Collaborate with the school district to facilitate access and community use of school grounds (joint use agreements).

A8.1d Consider the feasibility of capping SR-110 with a linear park system.

Policy P8.2 Ensure the maximum distance between residents' homes and the nearest public park or preserve is ½ mile; ¼ mile is preferred.

A8.2 Expand the overall parks and recreation system through repurposing public land like excess streetspace, partnering with other organizations like SPUSD, churches, YMCA, and similar institutional uses for access and joint use of open space and facilities, and use other creative means to help address service gaps.

Policy P8.3 Promote, expand, and protect a green infrastructure that links the natural habitat.

A8.3a Prepare a citywide Green Infrastructure Framework.

A8.3b Implement simple, small, and low-cost demonstration green infrastructure projects both in the public and private realms.

A8.3c Expand the function of parks and open spaces beyond recreation, to store and clean water, filter air, help improve public health, and provide habitat and connectivity to increase biodiversity, in essence to become green infrastructure.

Policy P8.4 Identify opportunities to provide small parks or provisional open space uses.

A8.4a Acquire individual lots in areas of the City that are underserved with park land to develop mini parks for the residents' use.

A8.4b Examine underutilized residual spaces for potential use as passive or active open space areas.

Policy P8.5 Develop and support a citywide parklet program.

A8.5a Develop design guidelines for parklets and streamline the permitting process and maintenance requirements.

A8.5b Support implementation of parklet demonstration projects in the Downtown area.

A8.5c Identify locations for parklets citywide along streets with foot traffic, where automobile traffic is low-speed, and where there are surrounding establishments that can provide a level of surveillance.

Policy P9.15 Promote the conservation of older historic landscapes and natural features that contribute to the character of historic districts and landmarks.

A9.15a Assess the sustainability and long-term health of the City's canopy of street trees and trees in parks.

A9.15c Encourage incorporation of natural features, existing trees, and archaeological sites into new development projects with sensitivity to ensure their protection and public enjoyment.

Downtown Specific Plan Update

P1.2 Promote and require the integration of Green Infrastructure into storm water management systems.

A1.2a Review and revise development regulations to encourage a green approach in new developments. Minimize impervious areas. Develop new projects and retrofit existing surfaces to reduce runoff through infiltration.

A1.2b Incorporate Green Street elements into the redesign of Mission Street and Fair Oaks Avenue.

A1.2c Promote the use of green roofs, bio-swales, pervious materials for hardscape, and other stormwater management practices to reduce water pollution.

P1.3 Preserve, manage, and grow the downtown tree canopy.

A1.3a Preserve the existing Downtown canopy with continued maintenance and protection against tree removal.

A1.3b Replace the dead, diseased, declining, or poorly structured, street trees.

A1.3c Plant new trees annually on Downtown streets and parks.

A1.3e Increase species diversity—encouraging the use of native, non-invasive, and water efficient species for a more resilient urban forest.

A1.3f Craft appropriate incentives that encourage property owners to add green infrastructure on private property, including trees, living walls, and green roofs.

A1.3g Require new development to plant trees along the property frontages.

A5.1b Adopt an Urban Forest Management Plan that prescribes resilient and drought tolerant trees to plant and maintain on Downtown public and private property.

P6.8 Expand the opportunities in the Downtown area to interact with nature within the streets, open spaces, and buildings.

A6.8a Incorporate street trees, street side planters, parklets into street and alley design.

A6.8b Develop a network of public and private green space.

P6.11 Support efforts to expand access to affordable and nutritious food for all people in South Pasadena.

A6.11b Incorporate trees, planters, parklets into street and alley design**.**

A6.11d Encourage new building construction to incorporate green roofs, and encourage conversions of existing roof space to green roofs.

2021–2029 Housing Element Implementation Programs

There are no Housing Element goals or policies related to biological resources.

3.3.6 ENVIRONMENTAL IMPACTS

Sensitive Species

Threshold 3.3a: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Habitat potentially suitable for native wildlife species in the City is limited to the ornamental vegetation in developed areas and the native soils and vegetation in the undeveloped open space areas. Habitat potentially suitable for native plant species is restricted to the undeveloped, naturally vegetated open space areas. Cooper's hawk and western mastiff bat are special status wildlife species with potential to occur in the large trees that are located throughout the City. Removal, trimming, or other disturbance of occupied trees may result in loss or harm to individuals of these species and may negatively affect the local population. Potential impacts to Cooper's hawk and western mastiff bat would be avoided with implementation of mitigation measure (MM) BIO-1 and MM BIO-2. MM BIO-1 requires that a qualified biologist conduct nesting bird surveys prior to all construction or site preparation activities situated near potentially suitable habitat, such as trees and shrubs, that would occur during the nesting and breeding season of native bird species (typically March 1 through August 15). If an active nest is present, the biologist would place a temporary buffer around the nest site. MM BIO-2 requires that trimming or removal of mature or significant trees, as defined by the City, be conducted outside the breeding season for native bird and bat species (typically August 16 through February 28) whenever feasible, and if this activity must occur during the breeding season, a qualified biologist would survey the tree to assess the presence or absence of any active bird nest or bat maternity roost.

No other special status plant or wildlife species have potential to occur in the ornamental vegetation associated with the developed areas in the City of South Pasadena. The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would mostly direct future development to occur in areas of existing development, and implementation of the Project would limit development of otherwise undeveloped, naturally-vegetated open space that may be used by special status plant or wildlife species. The proposed General Plan and

DTSP Update includes several policies and actions supporting the expansion of open space areas; these would be expected to have the potential to support both Cooper's hawk and western mastiff bat.

As discussed previously, the minimally developed, open space areas supporting stands of native vegetation have potential to support various special status plant and wildlife species. Although future development would be focused away from these areas, one proposed action in the General Plan Update encourages the use of fire resistant landscaping in hillside areas. This would include some properties adjacent to undeveloped or vacant open space areas. Introduction of invasive plant species by future development near these undeveloped or vacant open space areas could result in the spread of the plant species to native habitats in the undeveloped, naturally vegetated open space areas subsequently displacing potentially suitable or occupied habitat of special status plant and wildlife species. This would be considered a significant impact. Therefore, MM BIO-3 requires the City to develop a list of fire-resistant plant species that excludes exotic plant species with a high or moderate rating on the California Invasive Plant Council's invasive plant inventory. This fire-resistant plant list would be used for any requirements of recommendations to residents, businesses, and/or developers of future projects in hillside areas that require fire-resistant construction and landscaping. MM BIO-3 would ensure that residents and other parties are not encouraged to plant exotic, invasive species for fire resistance, and would reduce the potential impact to less than significant.

As previously mentioned, the undeveloped and vacant open space areas supporting stands of native vegetation have potential to support various special status plant and wildlife species. Although future development would be focused away from these areas, there may be direct impacts of projects and indirect impacts of activities occurring adjacent to these areas. Such activities may result in loss or harm of special status native species within these areas. MM BIO-4, which requires an applicant to conduct a biological resources assessment and appropriate surveys and implement any recommended avoidance measures prior to project initiation within or adjacent to native-vegetated open space areas, would reduce this potential impact to a less than significant level.

With implementation of MMs BIO-1 through BIO-4, impacts to special status species would be less than significant.

Threshold 3.3b: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would generally direct future development to areas of existing development, and limit development of otherwise undeveloped, native-vegetated open space, thereby limiting potential effects to sensitive natural communities. Regardless, the 2021–2029 Housing Element Implementation Programs may result in future development of vacant areas supporting native vegetation communities, potentially containing sensitive upland vegetation types. Implementation of MM BIO-4, which requires the Applicant/Developer of future development projects to have a biological assessment conducted, would reduce potential impacts to sensitive upland vegetation types to a less than significant level. Furthermore, sensitive riparian vegetation types are typically associated with drainage features. As such, these communities are protected under State and federal law as discussed above in Section 3.3.3. Implementation of MM BIO-5, which requires the Applicant/Developer of future development projects to conduct a delineation, if recommended by

a qualified biologist, and subsequent consultation with and acquisition of permits from the appropriate regulatory agencies prior to initiation of any site disturbance activities, would reduce this potential impact to a less than significant level.

Threshold 3.3c: Would the project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would mostly direct future development to areas of existing development, limiting development of naturally-occurring drainage features, and therefore minimizing potential impacts to any vegetated riparian or wetland habitat. Furthermore, cement-lined jurisdictional drainage features are dispersed across the City and impacts to those features may occur as a result of the proposed Project.

As discussed in Section 3.3.3, Relevant Programs and Regulations, the CWA requires permits for activity involving jurisdictional waters. Prior to any impacts to the resources under the jurisdiction of the USACE, CDFW, or RWQCB, appropriate permits would have to be obtained from these resource agencies. These permits would identify necessary mitigation to reduce disturbance impacts and require appropriate replacement habitat to ensure no net loss in biological resource values. Compliance with the permit requirements would reduce potential impacts to wetlands and riparian communities to a less than significant. Also, implementation of MM BIO-3, discussed under Threshold 3.3a, would avoid impacts related to introduction of invasive plant species installed for the purpose of fire-resistant landscaping into riparian habitats. Furthermore, implementation of MM BIO-5, which requires the Applicant/Developer of future development projects to conduct a delineation, if recommended by a qualified biologist, and subsequent consultation with and acquisition of permits from the appropriate regulatory agencies prior to initiation of any site disturbance activities, would reduce this potential impact to a less than significant level.

Threshold 3.3d: Would the Project interfere substantially with the movement of any native or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife movement is already greatly restricted within the City due to existing urban development in most areas. Wildlife movement is likely to be confined to the Arroyo Seco along the western boundary of the City and within the vacant, naturally vegetated open space areas in the southwestern portion of the City. The proposed General Plan and DTSP Update would direct future development to occur in areas of existing development, and not to areas of undeveloped, naturally vegetated open space. Therefore, implementation of the Project would not reduce the amount of available undeveloped, naturally vegetated open space used by wildlife for migration.

The policies and associated actions outlined in the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would connect some of the existing landscaped parks and open space areas benefiting urban wildlife movement. There are actions in the proposed General Plan Update that would further increase foraging habitat for wildlife by promoting green roofs, micro-parks, and other opportunities for newly vegetated areas connecting existing open space areas. There are also actions of the proposed General Plan Update that would promote increasing public access to open space areas, both open space areas and parks,

which could negatively affect wildlife movement by increasing human presence and the associated disturbance to occupied habitats. However, it is expected that impacts resulting from increased human presence would be minimal due to the existing urban setting and small increment of construction activity/development, and related population, proposed as well as being partially offset by the anticipated increase in newly vegetated areas with new areas for wildlife refuge.

Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs may involve vegetation clearing and tree removal that could also result in the direct loss of active bird nests, active bat maternity roosts, or the abandonment of active nests or roosts by adults. Bird nests with eggs or young are protected under the MBTA and the *California Fish and Game Code* and may be considered native wildlife nursery sites. Active bat maternity roosts are considered native wildlife nursery sites. Implementation of MMs BIO-1 and BIO-2 would reduce adverse impacts to nesting birds to a less than significant level by minimizing or avoiding disturbance through seasonal scheduling and/or pre-construction surveys and avoidance of designated active nesting areas. Implementation of MM BIO-2 would reduce impacts to an active bat maternity roost to a less than significant level through seasonal avoidance or pre-construction surveys and avoidance.

Threshold 3.3e: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City of South Pasadena has a detailed tree preservation ordinance. The proposed General Plan Update include actions, consistent with the City's tree preservation ordinance, that direct all removed trees to be replaced and a minimum number of new trees to be planted annually regardless of the number of trees removed. Furthermore, actions of the proposed General Plan and DTSP Update would improve the health of existing trees due to implementing new Best Management Practices designed to benefit tree health. Because all development within the City would be required to comply with the policies and regulations set forth in the City's tree preservation ordinance, the proposed Project would not conflict with this local policy. There would be a less than significant impact, and no mitigation is required.

Threshold 3.3f: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

There are no adopted, approved, or proposed Habitat Conservation Plans (HCP); Natural Community Conservation Plans (NCCP); or other approved local, regional, or State habitat conservation plans that cover habitats located within the City of South Pasadena. There would, therefore, be no conflict with any such provisions and no impact would occur with implementation of with adoption of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs or with future development pursuant to the Project. No mitigation is required.

3.3.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

The cumulative impacts on biological resources are evaluated based on the potential impacts of growth and development in the City and in the San Gabriel Valley. Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs could contribute to the cumulative changes in plant and wildlife habitats in the San Gabriel Valley due to increasing urbanization and population growth in the region.

Development on disturbed lands and developed areas, which are likely to support non-native species or disturbed habitats, are less likely to have adverse impacts on special status plant and wildlife species. The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would mostly direct future development to occur in areas of existing development. With implementation of MMs BIO-1 and BIO-2, which reduce impacts related to the potential presence of special status bird and bat species in developed areas of the City; MM BIO-3, which reduce impacts related to invasive plant species for fire-resistant landscaping; and MM BIO-4, which requires an impact assessment for future development of vacant, naturally vegetated areas, the Project would not contribute to a significant cumulative impact to sensitive plant and wildlife species, riparian habitat, and jurisdictional resources.

Anticipated future development within the City would have a less than significant cumulative impact on wildlife movement due to the extent of existing development and resulting restrictions on wildlife movement opportunities. Compliance with the City's tree preservation ordinance would ensure that future development within the City would result in a less than significant cumulative impact on trees and associated policies protecting a biological resource.

There is no adopted HCP/NCCP for the City or surrounding area. Thus, implementation of the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not contribute to a cumulative impact due to a conflict with a HCP/NCCP would.

Because potentially significant impacts to biological resources resulting from future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would be less than significant with MMs BIO-1 through BIO-3 and relevant goals, policies, and actions, future development under the Project is not expected to contribute to a cumulatively significant impact to biological resources.

3.3.8 MITIGATION MEASURES

MM BIO-1 A qualified biologist shall conduct nesting bird surveys in areas with potentially suitable habitat prior to any construction or site preparation activities that would occur during the nesting and breeding season of native bird species (typically March 1 through August 15). The survey area shall include all potential bird nesting areas within 200 feet of any disturbance. The survey shall be conducted no more than three days prior to commencement of activities (i.e., grubbing or grading).

If active nests of bird species protected by the MBTA and/or the *California Fish and Game Code* (which, together, apply to all native nesting bird species) are present in the impact area or within 200 feet of the impact area, a temporary buffer shall be placed a minimum of 200 feet around the nest site. This temporary buffer may be greater or lesser depending on the bird species and type of disturbance, as determined by the biologist and/or applicable regulatory agency permits.

Clearing and/or construction within the buffer shall be postponed or halted until juveniles have fledged and there is no evidence of a second nesting attempt. The biologist shall serve as a construction monitor during those periods when

disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur.

MM BIO-2 Trimming or removal activities of mature or significant trees will be conducted between August 16 and February 28, outside of the breeding season for native bird and bat species. If activities trimming or removal activities must be conducted during the breeding season, a qualified biologist shall survey the tree to be impacted to assess the presence or absence of any active bird nest or bat maternity roost. If either are determined to be present, trimming or removal activities will be postponed until after the breeding season has concluded, or until otherwise deemed acceptable by the qualified biologist due to a discontinuation of nesting bird activity or bat roost vacancy.

MM BIO-3 Within six months of the adoption of the General Plan and Downtown Specific Plan Update, the City shall develop a list of fire-resistant plant species that excludes exotic plant species with a high or moderate rating on the California Invasive Plant Council's invasive plant inventory. This fire-resistant plant list shall be the basis of any requirements or recommendations to residents, businesses, and/or developers of future projects in hillside areas that require fire-resistant construction and landscaping.

MM BIO-4 If the disturbance limits of any future development project are within 500 feet of native vegetation located in the Arroyo Seco drainage corridor, the Applicant/Developer shall have a biological assessment conducted. A biological assessment shall also be conducted for all future development on or immediately adjacent to vacant, naturally vegetated parcels. All assessments shall be conducted by a qualified biologist and shall identify all potential sensitive biological resources and provide recommendations for focused surveys (if warranted) and/or avoidance or minimization conditions for project implementation. The assessment shall be reviewed and approved by the City prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all recommendations of the biological assessment such that project-level impacts are not expected to reduce regional populations of plant and wildlife species to below self-sustaining levels.

MM BIO-5 If project construction activities of any future development project have the potential to impact (e.g., dredge and fill, demolition, dewatering or other discharge) a channel/drainage that conveys water during rainfall events, at a minimum, or as recommended by the qualified biologist conducting an assessment per MM BIO-4 above (if also applicable), shall conduct a jurisdictional delineation to determine if impacted channel/drainage meets definition of State and federal regulations. If the delineation report, prepared by a qualified biologist, indicates potential regulated drainage(s), subsequent consultation with appropriate regulatory agencies (depending on the agency jurisdiction[s]) and acquisition of permits, if required, prior to initiation of any site disturbance activities (including, but not limited to, equipment and materials staging, grubbing, and fence installation). As a condition of project approval, the City shall require the Applicant/Developer to adhere to all permit conditions.

3.3.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative level

3.3.10 REFERENCES

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3.4 CULTURAL AND TRIBAL CULTURAL RESOURCES

3.4.1 METHODOLOGY

This section analyzes cultural resources (historic, archaeological, and tribal cultural) impacts with implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Project. Information in this section is derived from historic resources research and analysis conducted by Architectural Resources Group and based in part of the City's *Citywide Historic Resources Survey* prepared by Historic Resources Group (HRG) and dated June 20, 2017 (2017 Survey), a historic and archaeological records search conducted by the South Central Coastal Information Center (SCCIC) on August 17, 2020 (Appendix C-1), Senate Bill (SB) 18 and Assembly Bill (AB) 52 outreach records regarding tribal cultural resources conducted by the City (Appendix C-2), and review of recent California Environmental Quality Act (CEQA) documentation for City of South Pasadena projects.

3.4.2 EXISTING CONDITIONS

Ethnographic and Development History

The original inhabitants of the present-day City of South Pasadena (City) were members of the Hahamog'na tribe, a band of the native Tongva people, who settled along the banks of the Arroyo Seco (Pasadena Savings and Loan Association 1952). The tribe elected to settle in this area because of the plentiful water supplied by both the Arroyo Seco and a small brook located to the east of Raymond Hill. It also occupied a geographically strategic site that allowed them to control trade and access across the San Gabriel Mountains (HRG 2014). Like most of Southern California's indigenous populations, the Hahamog'na have been described in ethnographic accounts as a peaceful group of hunter-gatherers who subsided on small game as well as berries, seeds, roots, and nuts derived from native plants.

Circa 1770, Spanish explorer Gaspar de Portolá came upon the Hahamog'na's territory while embarking on an overland excursion between San Diego and Monterey that led to the Spanish colonization of California. Accompanying him was Father Junípero Serra, who was charged with founding a network of missions to spread the Catholic faith and cement Spain's stronghold in the region. In 1771 Father Serra founded the Mission San Gabriel Arcángel roughly five miles to the east of the City. The Hahamog'na peaceably received Portola and his entourage; and eventually they were assimilated into mission life. As neophytes, they were compelled to perform the unpaid labor that kept the mission running, including making bricks, tanning leather, tending vineyards, herding sheep, and working as lime burners (HRG 2014).

California remained a Spanish colony until 1822, when it was ceded to Mexico. Under Mexican rule the missions were secularized, and almost all of the land within California was divided into expansive land grants — or ranchos — that were given to those who were held in high regard with the Mexican government. An area comprising 14,000 acres and comprising the present-day cities of Pasadena, South Pasadena, and San Marino was given to Spanish lieutenant Juan Mariné and was known as Rancho San Pascual (HRG 2014). Rancho San Pascual passed through a succession of owners over time, and portions of it were eventually carved out and sold off. What is now the City of South Pasadena was primarily used for cattle grazing, dairy farming, and other types of agribusiness, and a handful of small adobe houses were erected in the vicinity.

The roots of the present-day City of South Pasadena are associated with those of the City Pasadena, its northern neighbor. In 1873 an area comprising nearly 4,000 acres was deeded to the Indiana Colony (reorganized as San Gabriel Orange Grove Association) and was settled by

a group of Indiana investors who sought better weather and fertile soil on which to cultivate citrus and other cash crops (HRG 2014, Creason 2016). Much of this area was subsequently named Pasadena. As the City of Pasadena began to grow into a vibrant community in the late nineteenth century, those who had settled in the southern reaches of the colony — the area south of Columbia Street — began to see themselves as a separate community. They chartered their own school district (1878) and post office (1882), and when the City of Pasadena incorporated in 1886 the southern area was not included within the Pasadena city limits (HRG 2014).

The City of South Pasadena witnessed a frenzy of development activity in the 1880s, upon the arrival of railroad lines to the area. In 1885, the Los Angeles and San Gabriel Valley Railroad arrived and connected the City with the cities of Pasadena and Los Angeles. A transcontinental railroad line to Los Angeles was also constructed at around the same time, which put Southern California squarely on the national radar and brought scores of visitors, settlers, and speculators to the region. In 1886, travel agent Walter Raymond opened the 200-room Raymond Hotel, a resplendent edifice that instantly became a tourist attraction (Thomas 2008). Also, that year, Edwin Cawston opened the Cawston Ostrich Farm, an equally popular tourist destination where guests could ride the birds, feed them oranges, and buy products that were made of their skin and feathers (HRG 2014). The City of South Pasadena incorporated in 1888 and became the County of Los Angeles' sixth city.

By the turn of the 20th century, the City boasted a population of 1,001 and had matured into an early residential suburb. Just ten years later, in 1910, its population had grown more than fourfold, to 4,600 (HRG 2014). Almost all of the development that took place during this early period of the City's history consisted of single-family houses that exhibited Arts and Crafts influences. A small, yet vibrant commercial node had also emerged along Mission Street, to the east of Meridian Avenue. Anchored by the local railroad depot, it consisted predominantly of one and two-story brick commercial buildings and resembled a typical, small-town business street complete with retail stores on the ground level and apartments and meeting halls up above (NRHP Inventory 1977).

The population of Southern California grew steadily in the early decades of the 20th century, and many newcomers were attracted to the suburban setting and bucolic atmosphere afforded by the City. By the 1920s, the City's subdivisions and neighborhoods were almost entirely developed with detached, single-family dwellings predominantly designed in the Craftsman and Period Revival idioms that were popular at the time. New businesses and institutions also arose to meet the day-to-day needs of the growing city, with most commercial development concentrated along Mission Street and Fair Oaks Avenue.[1] The City also made notable improvements to its infrastructure and increased the scope of its civic resources.

In 1923, amid this period of growth, the City implemented a zoning ordinance that regulated future development and notably permitted the construction of multi-family residences, primarily along major vehicular thoroughfares. By the end of the decade the City had the look and feel of a quintessential suburb. Far enough removed from, yet within a reasonable distance, to the City Los Angeles' central business district and other urban amenities, it appealed to commuters who relied upon Los Angeles but sought a living environment that, on the whole, was safer, more tranquil, and more bucolic. Though the City had a well-defined business district and a smattering of institutions and light industry, it was known as a residential community and was lauded for its tranquil, tree-lined streets and for the quality of its housing stock.

[1] Information relating to development patterns was derived from analysis of Sanborn Fire Insurance maps.

The Great Depression stymied development in the City, as it did throughout virtually all of Southern California. Though some new houses continued to be erected on vacant parcels within existing subdivisions, the pace of development paled when compared to the prosperous times of previous decades. New construction at this time was largely limited to institutional buildings and other public works endeavors that were funded by the array of federal programs associated with the New Deal. The Depression also spelled disaster for some of the City's most iconic and enduring institutions, chief among them being the Raymond Hotel. The hotel was foreclosed on in 1931; three years later, in 1934, it was demolished (HRG 2014).

Historically accessed and traversed primarily by rail, the City increasingly became the domain of the automobile as the 20th century progressed. Buses replaced trolleys on Mission Street in 1935 (HRG 2014). In 1938, ground was broken on the Arroyo Seco Parkway, the first high speed, limited access, divided lane highway in the western United States. Construction of the parkway — which provided a direct vehicular route between the cities of Pasadena and Los Angeles, and charted a course that passed through the City of South Pasadena — marked the first stretch of road in what would eventually develop into an expansive regional freeway network (i.e., State Route [SR] 110) (HRG 2014, NPS 2018). It also rendered it easier for the motoring public to access the suburban environment of the City by car.

Most of the developable land within the City was built out by World War II, aside from two areas that were seen as prime development sites: the location of the demolished Raymond Hotel, and the Monterey Hills area near the southwest corner of the City (HRG 2014). Both were targeted for development after World War II, at which time Southern California experienced a sudden and substantial population increase and a corresponding shortage of housing. The Raymond Hotel site was rezoned to accommodate mid-rise multi-family residential development, and the Monterey Hills were subdivided and developed predominantly with single-family houses. Other development that took place at this time was limited to infill within existing neighborhoods. New commercial development was also pursued on an infill basis within existing commercial nodes. In 1983, voters approved a ballet measure to adopt a Citywide 45-foot building height limit.

In 1959, the State of California adopted its Master Plan of Freeways and Expressways, which included a northward extension of the Long Beach Freeway (then signed SR-7, and now as Interstate [I] 710) between the cities of Alhambra and Pasadena. In 1964, State transit officials formally adopted the "Meridian Route" as the alignment of this extension, which was to pass directly through the City and effectively divide the community in half (South Pasadena 2018). Due to its potential to alter the City's built landscape, these plans engendered a considerable amount of community opposition among City residents and emerged as one of the most divisive, controversial, and enduring planning issues affecting the City. For several successive years, the entire City was identified as one of the Eleven Most Endangered Places in the United States by the National Trust for Historic Preservation, as a result of the irreparable impact the proposed freeway would likely yield on historical resources within the City (South Pasadena 2018). In 2017, essential funding was pulled from the freeway project, which would have connected the I-710 to the I-210, which effectively terminated it (NTHP 2017). In October 2019, Senate Bill (SB) 7, Surplus Nonresidential Property and State Highway Route 710, was signed into law. Among other items, the bill removed, effective January 1, 2024, from the California freeway and expressway system the portion of I-710 between Alhambra Avenue in the City of Los Angeles and California Boulevard in the City of Pasadena.

Historical Resources

The City has an active historic preservation program that promotes and protects significant elements of its architectural and cultural heritage. The local historic preservation movement was

conceived in 1970, when South Pasadena Beautiful[2] created a subcommittee to study ways and means to promote historic preservation in the community. Eventually, the subcommittee became the Jean Driskel Foundation, later renamed the South Pasadena Preservation Foundation, a private non-profit organization. The City's first Historic Preservation Ordinance followed soon after in 1971, putting the City on the forefront of preservation planning.

In 1991, the City Council commissioned the first comprehensive, citywide historic resource survey. This survey generated an inventory of historic resources and also provided a foundation for their recognition and protection in future planning endeavors. The City updated its Cultural Heritage Ordinance in 1992, which included the then present-day criteria and mechanisms for designating individual resources and historic districts at the local level. On July 19, 2017, the City Council adopted Ordinance No. 2315 that repealed the current ordinance and replaced it with a new ordinance that was effective August 18, 2017 and addresses current preservation issues and strengthens the City's legal framework needed to assure continued protection of its historic character and scale.

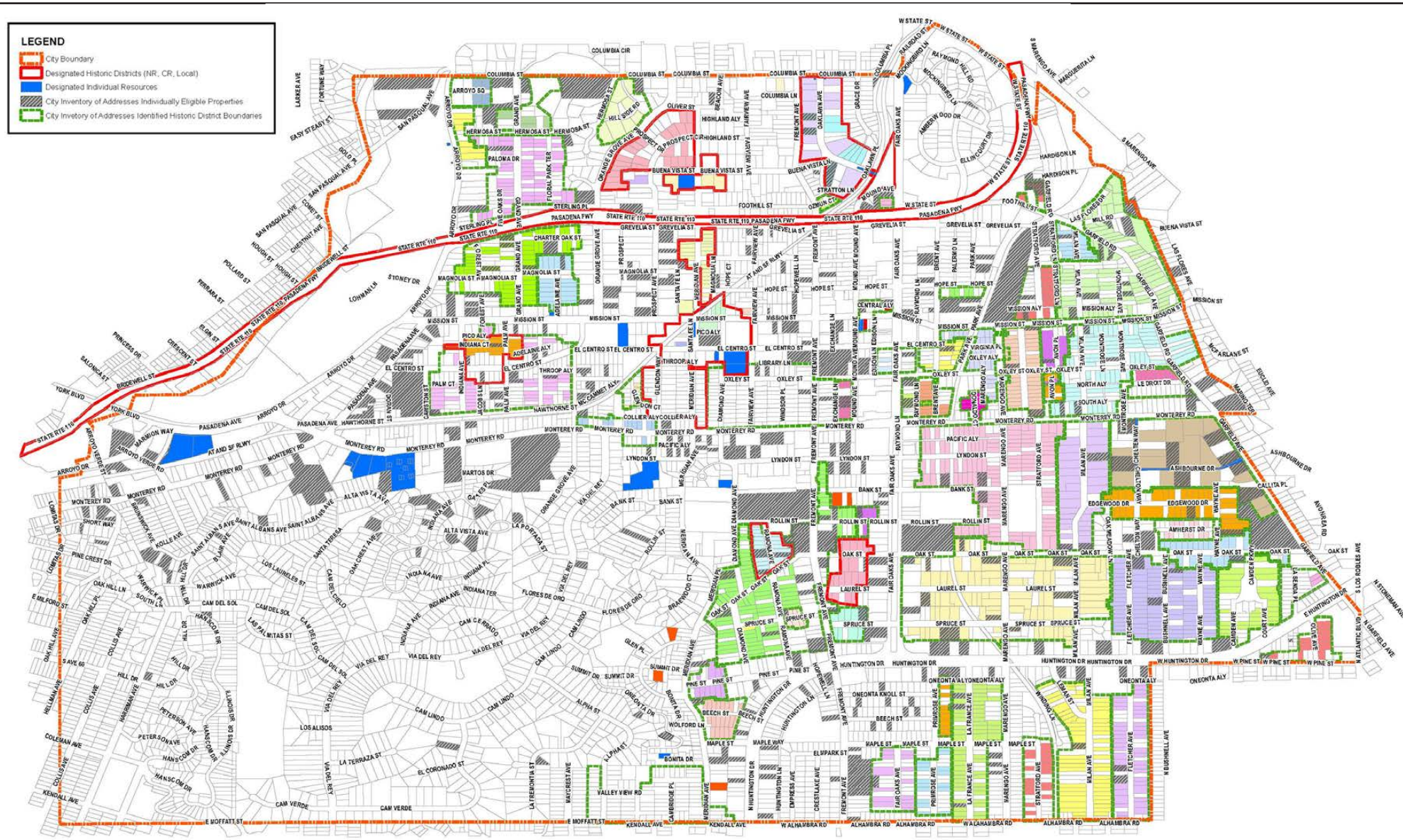
In 1994, findings from the comprehensive historic resource survey were adopted by the City Council; the inventory that was generated from this exercise was known as the Historic Resources Survey: Inventory of Addresses; it included designated properties, as well as properties that appear eligible for federal, State, or local listing. The Inventory of Addresses was updated in 2002; and again in 2017 in the *Citywide Historic Resources Survey* (2017 Survey). The following analysis is based on information in the 2017 Survey.

The pool of known historical resources in the City can be classified in the following two categories: (1) designated historical resources and (2) potential historical resources. The former includes individual resources and concentrations of resources (historic districts) that have been formally designated at the federal (i.e., National Register of Historic Places [NRHP]), State (i.e., California Register of Historic Resources [CRHR]), and/or local level (i.e., City of South Pasadena). The latter consists of individual resources and historic districts that have been identified as potentially eligible for federal, State, and/or local listing through survey evaluation. The 2017 survey produced a comprehensive list of historical resources (designated and potential) within the City that were built through the year 1972. The 2017 Survey derived from the survey is considered to constitute a complete and authoritative list of known historical resources within the City (HRG 2017). The 2017 Survey comprises 2,718 entries and consists of designated individual properties, historic districts, and district contributors; eligible individual properties, historic districts, and district contributors; and properties that merit special consideration in the local planning process or require additional study. In accordance with Section 2.65(e)(3)(D)(ii) of the SPMC and the City's Cultural Heritage Ordinance, all properties in the 2017 Survey are considered historical resources for purposes of CEQA, and, therefore, the analysis in this Draft Program Environmental Impact Report (PEIR). Exhibit 3.4-1, South Pasadena Cultural Resources, illustrates the results of the 2017 Survey.

Designated Historical Resources

Per the 2017 Survey, 288 individual properties, districts (some of which include individual properties), and district contributors are designated as historic at the federal, State, and/or local level. Table 3.4-1, Designated Individual Resources, summarizes the 61 individual properties within the City that are designated as historic. This table only includes properties that have been

[2] A volunteer non-profit organization that partners with governmental, volunteer, philanthropic, and educational organizations to pursue sustainability and beautification projects in the City.



Source: Historic Resources Group 2017

South Pasadena Cultural Resources

Exhibit 3.4-1

South Pasadena General Plan and Downtown Specific Plan Update & 2021-2029 Housing Element

PSOMAS

(07/05/2018 MMD) R:\Projects\RAN\3RAN010100\Graphics\AdminDraft_EIR\ex_CulturalResources_Inventory.pdf

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individually designated, including individual resources that also fall within the boundaries of a designated historic district.

TABLE 3.4-1
DESIGNATED INDIVIDUAL RESOURCES

Address/Location	Year Built	Resource Name	Landmark Number	Status
1414 Alhambra Road	1923	Lloyd E Morrison Residence	24	City
425 Arroyo Drive	N/A	Garfias Spring	38	City
430 Arroyo Drive	N/A	Manuel Garfias Adobe Site	20	City
431 Arroyo Drive	1953	Cathedral Oak Monument	19	City
Ashbourne Drive	N/A	Ashbourne Drive and Chelton Way	12	City
2007 Ashbourne Drive	1917	Ashbourne/Chelton Hybrid Oak Tree	14	City
209 Beacon Avenue	1907; 1946; 1962	Whitney R Smith House and Studio	52	City
2031 Berkshire Avenue	1914	Mabel Packard House	39	City
816 Bonita Drive	1928	Grokowski House	28	CRHR; City
929 Buena Vista Street	1901	Torrance Childs House	11	City
1001 Buena Vista Street	1905	Garfield Residence	4	City
1005 Buena Vista Street	1897	Howard Longley Residence	17	City
1107 Buena Vista Street	1910	David M Rabb Family Homestead	53	City
1120 Buena Vista Street	1870	Knox-Merwin-Porter House	42	City
1243 Brunswick Avenue	1906	Single-Family Residence	N/A	CRHR
1301 Chelten Way	1911	Miltimore House	11	NRHP; City
919 Columbia Street	1885	Riggins House	48	CRHR; City
1109 Columbia Street	N/A	Single-Family Residence	N/A	CRHR
1127 Columbia Street	1908	Single-Family Residence	N/A	CRHR
1131 Columbia Street	N/A	Single-Family Residence	N/A	CRHR
1327 Diamond Avenue	N/A	School Administration Building	30	City
2017 Edgewood Drive	N/A	Eddie House and Memorial Park	32	City
1019 El Centro Street	N/A	South Pasadena Bank Building	8	CRHR; City
1115 El Centro Street	N/A	South Pasadena Library	10	NRHP; City
200 Fair Oaks Avenue	N/A	Raymond Hill Waiting Station	16	City
435 Fair Oaks Avenue	N/A	South Pasadena War Memorial Building	2	CRHR; City
435 Fair Oaks Avenue	N/A	Oaklawn Bridge and Waiting Station	3	CRHR; City
800 Fair Oaks Avenue	1911	Fair Hope Building	49	City
1019 Fair Oaks Avenue	1925	Rialto Theater	25	City
1414 Fair Oaks Avenue	1958	Smith and Williams Building	46	City
1804 Foothill Street	1919	Adobe Flores and Cactus Garden	1	NRHP; City
221 Fremont Avenue	1908	Single-Family Residence	N/A	CRHR
920 Fremont Avenue	1920	Grace Brethren Church	22	City
517 Garfield Avenue	1924	Adobe Eulalia Perez	35	City
1114 Garfield Avenue	1907	Chouinard House	44	City
225 Grand Avenue	1917	Dr John S Tanner Residence	23	City
1635 Laurel Street	1923	Clokey Oak Tree	13	City
851 Lyndon Street	1887	Wynyate	6	NRHP; City
909 Lyndon Street	1896	East Wynyate	43	CRHR; City

TABLE 3.4-1
DESIGNATED INDIVIDUAL RESOURCES

Address/Location	Year Built	Resource Name	Landmark Number	Status
913 Meridian Avenue	N/A	Meridian Iron Works	5	City
636 Mission Street	1928	Markey Building	31	City
729 Mission Street	1925; 1943; 1985	Baranger Studios	27	City
815 Mission Street	1939	Municipal Plunge Building	45	City
950 Mission Street	1923	Mission Arroyo Hotel	26	City
1000 Mission Street	1903	Century House	34	City
1501 Mission Street	1923	Pettee Building	37	City
237 Monterey Road	1887	Single-Family Residence	N/A	CRHR
309 Monterey Road	1889	Vivekananda House	29	City
323 Monterey Road	1947	Fleet House	51	City
355 Monterey Road	1986	Burwood House	47	City
844 Monterey Road	1908	Washburn House	40	City
911 Monterey Road	N/A	Single-Family Residence	N/A	CRHR
921 Monterey Road	1912	Single-Family Residence	N/A	CRHR
1103 Monterey Road	1885	Leo Longley Residence	21	City
1325 Monterey Road	1907	St James Episcopal Church	33	City
Oaklawn Avenue	N/A	Oaklawn Portals	9	City
201 Orange Grove Avenue	1887	Bissell House	36	City
215 Orange Grove Avenue	1875	Andrew O Porter Residence	15	City
220 Orange Grove Avenue	1913	Single-Family Residence	N/A	CRHR
1040 Stratford Avenue	1910	Huntzinger House	50	City
1010 Sycamore Avenue	1896	Cawston Ostrich Farm Site	18	City

N/A: not available; NRHP: National Register of Historic Places; CRHR: California Register of Historic Resources; City: designated by the City of South Pasadena

Source: Historic Resources Group (HRG). 2017 (Revised June). *City of South Pasadena Citywide Historic Resources Survey.* Pasadena, CA: HRG. 636721709083330000 (southpasadenaca.gov).

The 2017 Survey also identifies ten designated historic districts in the City, as follows:

- Arroyo Seco Parkway Historic District (NRHP);
- Buena Vista Historic District (City);
- El Centro/Indiana/Palm Historic District (City);
- Mission West/Historic Business District (NRHP);
- North of Mission Historic District (CRHR);
- Oak/Laurel Historic District (City);
- Oaklawn District/Oaklawn District Addition (NRHP);
- Prospect Circle Historic District (City);
- Ramona Craftsman District (City); and
- South of Mission Historic District (CRHR).

Collectively, the 2017 Survey identifies 236 contributing properties within South Pasadena's ten historic districts.

Potential Historical Resources

The 2017 Survey also identifies 2,257 resources in the City that have been determined potentially eligible for listing through survey evaluation, as follows (some resources are in more than one category):

- 62 potential historic districts;
- 1,846 contributors to potential historic districts;
- 603 individually eligible properties;
- 21 individual properties that may be eligible, but were not visible from the public right-of-way at the time of the 2017 survey;
- 7 individual properties that merit special consideration in local planning; and
- 64 individual properties that need to be reevaluated.

It is noted that 173 properties were identified as both individually eligible and as a district contributor. A complete list of all potential historical resources within the City is included in the 2017 Survey.

Archaeological Resources

Based on review of recent CEQA documentation for projects within the City and consultation with the City, there are no known archaeological resource sites within the City of South Pasadena (South Pasadena 2012, 2016).

An updated cultural resources records search was conducted for the Project site at the SCCIC at California State University, Fullerton on August 19, 2020. The SCCIC is the designated branch of the California Historical Resources Information System (CHRIS) for the Project site and houses records concerning archaeological and historic resources in Los Angeles, Ventura, San Bernardino, and Orange Counties. The review consisted of an examination of the U.S. Geological Survey's Los Angeles and Pasadena, California 7.5-minute quadrangles to determine if any cultural resources studies have been conducted within the Project site. The records search provided data on recorded archaeological and built environment resources within the Project site. Sources consulted at the SCCIC included archaeological records, Archaeological Determinations of Eligibility, historic maps, and the Historic Property Data File (HPDF) maintained by the California Office of Historic Preservation. The HPDF contains listings for the CRHR and/or the NRHP, California Historical Landmarks, and California Points of Historical Interest.

A total of 45 archaeological and/or historic studies have been conducted within the City, as shown in Table 3.4-2, Cultural Resources Studies Within the City, on the following page.

TABLE 3.4-2
CULTURAL RESOURCES STUDIES WITHIN THE CITY

Report No.	Year	Title	Author/Affiliation
LA-00112	1974	Impact on Archaeological Resources of Proposed Upgrading Ramps on the Pasadena Freeway	University of California, Los Angeles Archaeological Survey
LA-00115	1974	Evaluation of the Archaeological Resources and Potential Impact of Proposed Extension of the Long Beach Freeway (rt.7) North From Valley Blvd. to Rt. 210 (Colorado Freeway)	University of California, Los Angeles Archaeological Survey
LA-01319	1983	Archaeological Survey Report for Two Proposed Disposal Sites 07-la 7 Routes 10 to 210 07-204-020090	Caltrans
LA-03440	1994	Third Supplemental Historic Architectural Survey Report 710 Freeway Gap Closure Report (07-la 710, 26.5/r32.7 Ea 07-020090) Volume II: Pasadena Avenue District Reevaluation	Caltrans District 7: Environmental Planning Branch
LA-03497	1994	Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.
LA-03498	1994	Final Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.
LA-03498A	—	Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System	Harris Miller, Miller & Hanson Inc.
LA-04216	1900	Report of the US National Museum Under the Direction of the Smithsonian Institute for the Year Ending June 30, 1900	The Smithsonian Institute
LA-04386	1993	Cultural Resources Overview Los Angeles County Metropolitan Transportation Authority's Interstate Commerce Commission Abandonment Exemption Pasadena-Los Angeles Light Rail Transit Project	Caltrans
LA-04451	1993	Route 7 Environmental Impact Statement Supplement	Caltrans
LA-04638	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 948-01, in the County of Los Angeles, California	LSA Associates, Inc.
LA-04890	2000	Negative Archaeological Survey Report, Highway Project Description	Caltrans District 7
LA-04909	2000	Cultural Resources Investigation for the Nextlink Fiber Optic Project, Los Angeles and Orange Counties, California	Jones & Stokes
LA-05132	1999	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 1319 and 1921 Fremont Avenue, South Pasadena, Los Angeles County, California	McKenna et al.
LA-05421	2000	Negative Archaeological Survey Report: 07-la-110-07-174-965120	Caltrans District 7
LA-05434	2001	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 809 and 813 Meridian Avenue, South Pasadena, Los Angeles County, California	Mc Kenna et al.
LA-06334	2002	Below the Basketball Court: Burial Recovery at Arroyo Seco Park	Greenwood and Associates
LA-06362	1994	Finding of Effect on Historic Properties Arroyo Seco Parkway and Four Level Interchange	Caltrans District 7
LA-06385	2001	Section 106 Review for 5568 Via Marison Avenue Arroyo Seco Park Historic District Los Angeles, Ca	Historic Resources Group

TABLE 3.4-2
CULTURAL RESOURCES STUDIES WITHIN THE CITY

Report No.	Year	Title	Author/Affiliation
LA-06835	2003	Cultural Resource Assessment Cingular Wireless Facility No. Vy311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.
LA-06839	2003	Burial Data Summary Arroyo Seco/San Pascual Park Los Angeles, California	Greenwood and Associates
LA-07426	2004	Caltrans Historic Bridges Inventory Update: Concrete Arch Bridges	JRP Historical Consulting
LA-07553	2004	Cultural Resource Assessment Cingular Wireless Facility No. Vy 311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.
LA-08526	2004	Historic Resources Report, 258-266 Monterey Road, South Pasadena, California	San Buenaventura Research Associates
LA-08542	2004	Cultural Resource Records Search Results and Site Visit for Cingular Wireless Facility Candidate Sb-390-01 (Bilicke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	Michael Brandman Associates
LA-08634	2007	Cultural Resources Study of the Arroyo Seco Park Project, Royal Street Communications Site No. La0108b, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates
LA-08928	2007	A Phase I (CEQA) and Class II (NEPA) Cultural Resources Investigation for the Lower Arroyo Seco Trail and Trailhead Improvements Project Area in the City of Pasadena, Los Angeles County, California	McKenna et al.
LA-08948	2007	Public Review Draft Environmental Impact Report, Downtown Revitalization Project, Sch No. 2007031024	RBF Consulting
LA-09098	2006	Extended Phase I Testing for Cingular Wireless Facility Candidate 950-014 198e/lsanca0336 (Arroyo Park) Arroyo Seco Park, South Pasadena, Los Angeles County, California	Michael Brandman Associates
LA-09099	2005	Cultural Resources Records Search Results and Site Visit for Cingular Wireless Site 950-014-198e (City Park) Arroyo Park, Near Intersection of Comet Street and Pasqual Avenue, South Pasadena, Los Angeles County, California	Michael Brandman Associates
LA-09489	2003	Arroyo Seco Parkway Historic District	California Archives
LA-09601	2008	Cultural Resources Records Search and Site Visit Results for AT&T Candidate SV0061-01 (OG Park), 820 El Centro Street, South Pasadena, Los Angeles County, California.	Michael Brandman Associates
LA-10209	2004	Finding of Effect Report for the Raymond Ave. To SR110 Connector Project, Los Angeles County, CA	Myra L. Frank & Associates, Inc
LA-10388	2009	Direct APE Historic Architectural Assessment for Clearwire Candidate CALOS0099A/ LA03XC129A (S. Pasadena Water Tank), 700 S. La Portada, South Pasadena, Los Angeles County, California	MBA
LA-10541	2005	Finding of Effect for the Proposed Arroyo Seco Bike Path, Los Angeles County, California	EDAW, Inc.
LA-10541A	2003	Historic Property Survey Report Proposed Arroyo Seco Bike Path County Of Los Angeles, California	EDAW
LA-10541B	2003	Arroyo Seco Bike Path Historic Resources Evaluation Report HRER - Appendix 1	EDAW

TABLE 3.4-2
CULTURAL RESOURCES STUDIES WITHIN THE CITY

Report No.	Year	Title	Author/Affiliation
LA-10541C	2004	HPSR / Determinations of Eligibility for Arroyo Seco Bike Path Project	Caltrans
LA-10576	2004	Historic Property Survey Report for the Raymond Avenue to SR 110 Connector Project for the Raymond Avenue to SR 110 Connector Project	Myra L. Frank & Associates, Inc.
LA-10866	2007	Cultural Resources Study of the Arroyo Seco Park Project Royal Street Communications Site No. LA0108B, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates
LA-11231	2009	Historic American Engineering Record Arroyo Seco Flood Control Channel, Los Angeles County, California	EDAW, Inc.
LA-11529	2008	Arroyo Seco Channel Project in the cities of Los Angeles and Pasadena, Los Angeles County, California	Department of the Army
LA-11554	2000	Historic Resources Evaluation Report and Finding of No Adverse Effect for Oaklawn Bridge, City of South Pasadena Seismic Retrofit and Historic Restoration Project	California Archives
LA-11650	2011	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate IE24844-G (Stein Rooftop), 1959 Huntington Drive, Alhambra, Los Angeles County, California	Michael Brandman Associates
LA-12060	2012	Cultural Resources Study of the South Pasadena Water Tank Project, MetroPCS California, LLC Site No. MLAX04166, 700 La Portdada Street, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates
LA-12221	2012	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04862A (SB390 Billcke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	MBA
LA-12422	2013	Cultural Resources Assessment Arroyo Seco Pedestrian and Bicycle Path Project Cities of South Pasadena and Los Angeles Los Angeles County, California	LSA
LA-12423	2013	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04948A (LA948 Sinclair) 1499 Huntington Drive, South Pasadena, Los Angeles County, California	MBA
LA-13148	2013	Initial Study/Mitigated Negative Declaration Sewer Rehabilitation and Replacement Project	DUDEK
SCCIC 2020			

Additionally, 108 cultural resources were identified within the City, as shown in Table 3.4-3, Archeological and Historical Resources Within the City, on the following page.

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-003057	Prehistoric	Site	Resource Name – Arroyo Seco/San Pascual Site	2002 (John M. Foster, Greenwood & Associates)
P-19-150039	Historic	Building	OHP Property Number – 116020; Resource Name – Whitney & Virginia Smith House	1993 (Anne Schield, Caltrans)
P-19-150040	Historic	Building	OHP Property Number – 102633; Resource Name – Warren D House	1994 (D. Kane, Caltrans)
P-19-150041	Historic	Building	OHP Property Number – 116021; Resource Name – East Wynyate	1993 (Anne Schield, Caltrans)
P-19-150042	Historic	Building	OHP Property Number – 116022; Resource Name – Otake/Nambu House	1994 (Anne Schield, Caltrans)
P-19-150075	Historic	District	OHP Property Number – 116029; Resource Name – Stimson Historic District; Voided – 19-185128	1994 (D. Kane, Caltrans)
P-19-150078	Historic	Building, Element of District	OHP Property Number – 030300; Resource Name – Stone/Brooks House; Voided – 19-179611	1993 (A. Scheid, Caltrans)
P-19-150079	Historic	Building, Element of District	OHP Property Number – 030301; Resource Name – Henry Stephen Boice House; Voided – 19-179612	1993 (A. Scheid, Caltrans)
P-19-150080	Historic	Building	OHP Property Number – 030302; Resource Name – Frank P O'Connor House; Voided – 19-179613	1994 (A. Scheid, Caltrans)
P-19-179471	Historic	Building	OHP Property Number – 030160; Resource Name – Leo Longley House	1977 (Tom Sitton, Natural History Museum)
P-19-179472	Historic	Building	OHP Property Number – 030161; Resource Name – William Cooper House	1977 (Tom Sitton, Natural History Museum)
P-19-179473	Historic	Building	OHP Property Number – 030162; Resource Name – Anna B McKay House; Other – Marins S Daniels House	1977 (Tom Sitton, Natural History Museum)
P-19-179474	Historic	Building	OHP Property Number – 030163; Resource Name – Porter House	1977 (Tom Sitton, Natural History Museum)
P-19-179475	Historic	Building	OHP Property Number – 030164; Resource Name – South Pasadena School	1977 (Tom Sitton, Natural History Museum)
P-19-179476	Historic	Building	OHP Property Number – 030165; Resource Name – Raymond Hill Waiting Station; Other – SW Fair Oaks Ave & Raymond Hill Rd	1977 (Tom Sitton, Natural History Museum)
P-19-179477	Historic	Building	OHP Property Number - 030166; Resource Name - Kate Plumb House	1977 (Tom Sitton, Natural History Museum)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179478	Historic	Building	OHP Property Number – 030167; Resource Name – Kate A White House	1977 (Tom Sitton, Natural History Museum)
P-19-179479	Historic	Building, Element of District	OHP Property Number – 030168; Resource Name – A S Hoyt House	1977 (Tom Sitton, Natural History Museum)
P-19-179481	Historic	Building, Element of District	OHP Property Number – 030170; Resource Name – Williams-Perrin House; Other – Charles P Williams House	1977 (Tom Sitton, Natural History Museum)
P-19-179482	Historic	Building, Element of District	Resource Name – Garfield House; Other – Mrs. Lucretia R Garfield House; Other – Mrs. James A Garfield House	1973 (M L Fey, South Pasadena Cultural Heritage Commission)
P-19-179483	Historic	Building, Element of District	OHP Property Number – 030172; Resource Name – Howard Longley House	1973 (M L Fey, South Pasadena Cultural Heritage Commission)
P-19-179484	Historic	District	OHP Property Number – 030173; Resource Name – Buena Vista District	1976 (Lois M. Webb, Caltrans)
P-19-179486	Historic	Building, Structure, Element of District	OHP Property Number – 030175; Resource Name – Oaklawn Bridge & Waiting Station	1972 (M L Fey, South Pasadena Cultural Heritage Commission); 2000 (Daniel Abeyta, OHP); 2001 (Dan Peterson, Avila Tom Architects); 2001 (Glen Duncan, S. Pasadena Cultural Heritage Commission
P-19-179499	Historic	District	OHP Property Number – 030188; Resource Name – Oaklawn District; Other – Oak Lawn Place	1976 (L Webb, CA Department of Transportation); 2008 (Robert J. Magiligan)
P-19-179500	Historic	Building	OHP Property Number – 030189; Resource Name – Seymour House	1977 (T Sitton, Natural History Museum)
P-19-179501	Historic	Building	OHP Property Number – 030190; Resource Name – J R Riggins House, Gertmenian House	1977 (T Sitton, Natural History Museum; John W. Snyder, Caltrans)
P-19-179502	Historic	Building, Element of District	OHP Property Number – 030191; Resource Name – Alexander Block	1977 (T Sitton, Natural History Museum)
P-19-179503	Historic	Building, Element of District	OHP Property Number – 030192; Resource Name – Graham Block	1977 (T Sitton, Natural History Museum)
P-19-179505	Historic	Building, Element of District	OHP Property Number – 030194; Resource Name – Shapiro Block	1977 (T Sitton, Natural History Museum)
P-19-179506	Historic	Building, Element of District	OHP Property Number – 030195; Resource Name – Edwards & Faw Block	1977 (T Sitton, Natural History Museum)
P-19-179509	Historic	Building, Element of District	OHP Property Number – 030198; Resource Name – Herlihy Block; Other – South Pasadena Review Bldg	1977 (T Sitton, Natural History Museum)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179510	Historic	Building, Element of District	OHP Property Number – 030199; Resource Name – Taylor Block	1977 (T Sitton, Natural History Museum)
P-19-179516	Historic	Building, Element of District	OHP Property Number – 030205; Resource Name – Mission Hotel	1977 (T Sitton, Natural History Museum)
P-19-179518	Historic	District	OHP Property Number – 030207; Resource Name – South Pasadena Historic District; Resource Name – Mission West District	1976 (L Webb, CA Department of Transportation); 1977T (Sitton, Natural History Museum)
P-19-179519	Historic	Building	OHP Property Number – 030208; Resource Name – Jacobs Block	1977 (T Sitton, Natural History Museum)
P-19-179520	Historic	Building	OHP Property Number – 030209; Resource Name – Fremont Ave Brethren Church	1977 (T Sitton, Natural History Museum)
P-19-179521	Historic	Building, Element of District	OHP Property Number – 030210; Resource Name – Rialto Theater	1977 (T Sitton, Natural History Museum)
P-19-179522	Historic	Building	OHP Property Number – 030211; Resource Name – War Memorial Bldg	1977 (T Sitton, Natural History Museum)
P-19-179523	Historic	Building	OHP Property Number – 030212; Resource Name – South Pasadena High School Administration Bldg; Other – South Pasadena School District Office	1977 (T Sitton, Natural History Museum)
P–19–179524	Historic	Building	OHP Property Number – 030213; Resource Name – A Mitchell House, Dieterle House, Wilson House; Other – Albert A Mitchell House; Other – Wililam Dieterle House; Other – Wilson House	1977 (T Sitton, Natural History Museum)
P-19-179525	Historic	Building	OHP Property Number – 030214; Resource Name – A C Bilicke House; Other – South Pasadena Methodist Church	1977 (T Sitton, Natural History Museum)
P-19-179526	Historic	Building	OHP Property Number – 030215; Resource Name – St James Episcopal	1977 (T Sitton, Natural History Museum)
P-19-179527	Historic	Building	OHP Property Number – 030216; Resource Name – Tanner House	1977 (T Sitton, Natural History Museum)
P-19-179528	Historic	Building	OHP Property Number – 030217; Resource Name – Grokowsky House	1976 (L M Webb & A Cole, CA Department of Transportation)
P-19-179529	Historic	Building	OHP Property Number – 030218; Resource Name – Sherry House	1982 (J Snyder, DOTP Caltrans)
P-19-179530	Historic	Building	OHP Property Number – 030219; Resource Name – Kenneth W Joy House	1982 (J Snyder, DOTP Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179531	Historic	Building	OHP Property Number – 030220; Resource Name – The Captain's House	1982 (J Snyder, DOTP Caltrans)
P-19-179561	Historic	District	OHP Property Number – 030250; Resource Name – North of Mission District; Voided – 19-179647	1982 (J Snyder, DOTP Caltrans)
P-19-179610	Historic	District	OHP Property Number – 030299; Resource Name – South of Mission District; Voided – 19-179648	1982 (J Snyder, DOTP Caltrans)
P-19-179614	Historic	Building	OHP Property Number – 030303; Resource Name – J G Pierce House	1982 (J Snyder, DOTP Caltrans)
P-19-179615	Historic	Building	OHP Property Number – 030304; Resource Name – Miltimore House	1970 (E McCoy, UCSB/UCLA)
P-19-179616	Historic	Building	OHP Property Number – 030305; Resource Name – Adobe Flores; Other – La Casa de Jose Perez	1972 (M Fay, South Pasadena Cultural Heritage Commission)
P-19-179617	Historic	Building	OHP Property Number – 030306; Resource Name – Wynyate; Other – Welsh for Vineyard	1973 (Margaret Leslie Fay, S. LA-12060, LA-12221 Pasadena Cultural Heritage Commission)
P-19-179618	Historic	Building	OHP Property Number – 030307; Resource Name – Tanner House	1982 (J Snyder, DOTP Caltrans)
P-19-179645	Historic	Structure, District	OHP Property Number – 030334; Resource Name – Arroyo Seco Parkway Historic District; Other – SR-110 Pasadena Freeway, Arroyo Seco Freeway; OHP Property Number – 177126; National Register – NPS-10001198-9999	1982 (Snyder, John W., Cal Trans); 2003 (David Greenwood, Myra L. Frank & Assoc.); 2008 (Janice Calpo, Cal Trans)
P-19-179649	Historic	Building	OHP Property Number – 030339; Resource Name – 1100 Loma Vista Ct; OHP Property Number – 064983	1986 (J. Triem, McClelland Engineers)
P-19-179650	Historic	Building	OHP Property Number – 030340; Resource Name – Swimming Pool Bldg; Other – Plunge	1986 (J Snyder, Caltrans)
P-19-179651	Historic	Building	OHP Property Number – 030342; Resource Name – Edward Hall House	1986 (J Snyder, Caltrans)
P-19-179652	Historic	Building	OHP Property Number – 030343; Resource Name – E C Emmons House	1986 (J Snyder, Caltrans)
P-19-179653	Historic	Building	OHP Property Number – 030344; Resource Name – 1002 Highland St	1986 (J Snyder, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179654	Historic	Building	OHP Property Number – 030345; Resource Name – 1004 Highland St	1986 (J Snyder, Caltrans)
P-19-179655	Historic	Building	OHP Property Number – 030346; Resource Name – Anna S Breed House	1986 (J Snyder, Caltrans)
P-19-179656	Historic	Building	OHP Property Number – 030347; Resource Name – Drachmann House	1986 (J Snyder, Caltrans)
P-19-179657	Historic	Building	OHP Property Number – 030348; Resource Name – Groetzinger House; Other – Ruddock House	1986 (J Snyder, Caltrans)
P-19-179658	Historic	Building	OHP Property Number – 030349; Resource Name – 629 Grand Ave	1986 (J Snyder, Caltrans)
P-19-179659	Historic	Building	OHP Property Number – 030350; Resource Name – Thomson House; Other – Garrison House; OHP Property Number – 064905	1986 (J Snyder, Caltrans)
P-19-179660	Historic	Building	OHP Property Number – 030351; Resource Name – 400 Prospect Circle; OHP Property Number – 149742	1986 (J Snyder, Caltrans)
P-19-179661	Historic	Building	OHP Property Number – 030352; Resource Name – Mrs. E Ambrose House; OHP Property Number – 149744	1986 (J Snyder, Caltrans)
P-19-179662	Historic	Building	OHP Property Number – 030353; Resource Name – 420 Prospect Circle; OHP Property Number – 149747	1985 (J Snyder, Caltrans)
P-19-179663	Historic	Building	OHP Property Number – 030354; Resource Name – R L Gabriel House; Other – Percy & Emogene Griffin House; OHP Property Number – 149749	1985 (J Snyder, Caltrans)
P-19-179664	Historic	Building	OHP Property Number – 030355; Resource Name – 902 Buena Vista	1985 (J Snyder, Caltrans)
P-19-179665	Historic	Building	OHP Property Number – 030356; Resource Name – R L Spayde House	1985 (J Snyder, Caltrans)
P-19-179666	Historic	Building	OHP Property Number – 030357; Resource Name – Jessie Waterman House	1985 (J Snyder, Caltrans)
P-19-179667	Historic	Building	OHP Property Number – 030358; Resource Name – P A Reid House	1985 (J Snyder, Caltrans)
P-19-179668	Historic	Building	OHP Property Number – 030359; Resource Name – Donald E Marquis House	1985 (J Snyder, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179669	Historic	Building	OHP Property Number – 030360; Resource Name – Kenneth A Gabriel House	1985 (J Snyder, Caltrans)
P-19-179670	Historic	Building	OHP Property Number – 030361; Resource Name – P Tully House	1985 (J Snyder, Caltrans)
P-19-179671	Historic	Building	OHP Property Number – 030362; Resource Name – Stillman B Jameson House	1985 (J Snyder, Caltrans)
P-19-179672	Historic	Building	OHP Property Number – 030363; Resource Name – 310 Orange Grove Ave	1985 (J Snyder, Caltrans)
P-19-179673	Historic	Building	OHP Property Number – 030364; Resource Name – D C Smith House	1985 (J Snyder, Caltrans)
P-19-179674	Historic	Building	OHP Property Number – 030365; Resource Name – 330 Orange Grove Ave	1985 (J Snyder, Caltrans)
P-19-179675	Historic	Building	OHP Property Number – 030366; Resource Name – 340 Orange Grove Ave	1985 (J Snyder, Caltrans)
P-19-179676	Historic	Building	OHP Property Number – 030367; Resource Name – 441 Prospect Circle; OHP Property Number – 149751	1985 (J Snyder, Caltrans)
P-19-179677	Historic	Building	OHP Property Number – 030368; Resource Name – Lucian M Williams House; OHP Property Number – 149750	1985 (J Snyder, Caltrans)
P-19-179678	Historic	Building	OHP Property Number – 030369; Resource Name – Percy & Emogene Griffin House; OHP Property Number – 149749	1985 (J Snyder, Caltrans)
P-19-179679	Historic	Building	OHP Property Number – 030370; Resource Name – A C Buttalph Jr House; OHP Property Number – 149748	1985 (J Snyder, Caltrans)
P-19-179680	Historic	Building	OHP Property Number – 030371; Resource Name – Edward Byrne House; OHP Property Number – 149743	1985 (J Snyder, Caltrans)
P-19-179681	Historic	Building	OHP Property Number – 030372; Resource Name – Marie Emry House; OHP Property Number – 149755	1985 (J Snyder, Caltrans)
P-19-179682	Historic	Building	OHP Property Number – 030373; Resource Name – H A Wilcox House; OHP Property Number – 149754	1985 (J Snyder, Caltrans)
P-19-179683	Historic	Building	OHP Property Number – 030374; Resource Name – 461 Prospect Circle; OHP Property Number – 149753	1985 (J Snyder, Caltrans)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-179684	Historic	Building	OHP Property Number – 030375; Resource Name – 451 Prospect Circle; OHP Property Number – 149752	1985 (J Snyder, Caltrans)
P-19-179685	Historic	Building	OHP Property Number – 030376; Resource Name – T L Stearns House	1985 (J Snyder, Caltrans)
P-19-179686	Historic	Building	OHP Property Number – 030378; Resource Name – M Brokaw House	1985 (J Snyder, Caltrans)
P-19-179687	Historic	Building	OHP Property Number – 030378; Resource Name – C E Tracy House; OHP Property Number – 149737	1985 (J Snyder, Caltrans)
P-19-179688	Historic	Building	OHP Property Number – 030379; Resource Name – 430 S Orange Grove Ave	1985 (J Snyder, Caltrans)
P-19-179689	Historic	Building	OHP Property Number – 030380; Resource Name – R L Langer House; OHP Property Number – 149738	1985 (J Snyder, Caltrans)
P-19-179690	Historic	Building	OHP Property Number – 030381; Resource Name – I F Gordon House; OHP Property Number – 149739	1985 (J Snyder, Caltrans)
P-19-179691	Historic	Building	OHP Property Number – 030382; Resource Name – J F Gordon House; OHP Property Number – 149740	1985 (J Snyder, Caltrans)
P-19-179692	Historic	Building	OHP Property Number – 030383; Resource Name – Prospect Circle District; OHP Property Number – 149735	1985 (J Snyder, Caltrans)
P-19-186859	Historic	Building	Resource Name – Arroyo Seco Flood Control Channel; OHP Property Number – 147051 status code (2S2); OHP Property Number – 173825 status code (6X); National Register – NPS – 08000579-0027	2003 (M. Strauss, EDAW)
P-19-187627	Historic	Building	OHP Property Number – 126436; Resource Name – El Centro Market	2000 (G. Duncan, South Pasadena Cultural Heritage Commission)
P-19-188513	Historic	Building	OHP Property Number – 147063; Resource Name – S Pasadena Water Tower; Other – Sprint CA –LOS0099A; Other – Bilicke Water Tank	2009 (K.A. Crawford, Michael Brandman Associates)
P-19-189325	Historic	Building	OHP Property Number – 177126; Resource Name – Arroyo Seco Park; Other – Art in the Park	2000 (Christy Johnson, Historic Resources Group)

TABLE 3.4-3
ARCHAEOLOGICAL AND HISTORICAL RESOURCES
WITHIN THE PROJECT SITE

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
P-19-190613	Historic	Building	Resource Name – Arroyo Seco Golf Course	2013 (Casey Tibbet, Associates, Inc)
P-19-190632	Historic	Building	Resource Name – Medical Offices; Other – T-Mobile West LLC IE04948A/LA948 Sinclair	2013 (K.A. Crawford, Michael Brandman Associates)
P-19-190788	Historic	Building	Resource Name – 1000 Block Fair Oaks District; OHP Property Number – 150988	2002 (Jan Ostashay, Peter Moruzzi, PCR Services Corporation)
P-19-190789	Historic	Building	Resource Name – 1100 Block Fair Oaks District	2002 (Jan Ostashay, Peter Moruzzi, PCR Services Corporation)
P-19-191944	Historic	District	Resource Name – Garfield Substation Property	2015 (Wendy L. Tinsley Becker, Urbana Preservation & Planning)
SCCIC 2020				

One known prehistoric archaeological resource (P-19-0003057) is within the City of South Pasadena (SCCIC 2020). The archaeological resource is a prehistoric archaeological site also known as the Arroyo Seco/San Pascual Site. It was originally documented in 2002 when a human skull from a burial was identified during the trenching for an irrigation line. Upon discovery of the burial, the Los Angeles Police Department was notified, who retrieved the skull elements, and then turned over the remains to the Los Angeles Coroner, who notified the Native American Heritage Council (NAHC). Subsequent investigations with assistance of the Most Likely Descendent, Samuel Dunlap, revealed a rock cairn on the top of the human remains. Cultural constituents found with the burial included a chert projectile point base and marine shell (*Prototthaca staminea*). A local informant claims that "milling tools" were found in his yard across the street from the discovery, but these items have yet to be verified to actual provenience. Additionally, the area where the discovery was made has been designated as an archaeological site because of the important information and lack of ground visibility for the entire area.

Sacred Lands File Search

An inquiry was made on of the NAHC on July 10, 2020, to request a review of the Sacred Lands File (SLF) database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented on other databases. The NAHC completed its SLF search on July 15, 2020. The results from the NAHC Sacred Lands Files search for the Project site was positive, meaning one or more Native American sacred sites are documented within or near the City. The locations and other details of sacred sites are kept confidential in order to protect the sites.

3.4.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966, as amended, calls for the preservation of cultural resources through one of its implementing regulations (36 *Code of Federal Regulations*

[CFR] Section 800, Protection of Historic Properties), as well as under the National Environmental Policy Act. Properties of traditional religious and cultural importance to Native Americans are protected under Section 101(d)(6)(A) of the NHPA.

Section 106 of the NHPA (16 *United States Code* [USC] Section 470f) requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings (36 CFR 800.1). Under Section 106, the significance of any adversely affected cultural resource is assessed and mitigation measures are proposed to reduce the impacts to an acceptable level.

National Register of Historic Places

Significant cultural resources include resources that are listed in or are eligible for listing in the NRHP per the criteria listed at 36 CFR 60.4:

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age and possess significance in American history and culture, architecture, or archaeology. The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that meet one or more of four established criteria:

(a) Are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) Are associated with the lives of persons significant in our past; or

(c) Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) Have yielded, or may be likely to yield, information important in prehistory or history.

Physical Integrity

According to National Register Bulletin No. 15, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity”. Integrity is defined in National Register Bulletin No. 15 as “the ability of a property to convey its significance”. Within the concept of integrity, the NRHP recognizes seven aspects or qualities that, in various combinations, define “integrity”. They are feeling, association, workmanship, location, design, setting, and materials, and they are defined by National Register Bulletin No. 15 as follows:

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.

- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.

Historic Contexts

To be eligible for listing in the NRHP, a property must also be significant within a historic context. National Register Bulletin No. 15 states that the significance of a historic property can be judged only when it is evaluated in its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific . . . property or site is understood and its meaning . . . is made clear". A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the NRHP.

Historic Districts

The NRHP includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district "derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties".

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development. A district's significance and historic integrity should help determine the boundaries. Other factors include the following:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;
- Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
- Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
- Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

- It was present during the period of significance, relates to the significance of the district, and retains its physical integrity or

- It independently meets the criterion for listing in the NRHP.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995) (Secretary of the Interior's Standards) assist in the preservation of a property's historical significance by preserving historic materials and features of historic buildings of all materials, construction types, sizes, and occupancy. The standards include preservation of exterior and interior building components, related landscape features and the building's site and environment, as well as the compatibility of attached, adjacent, or related new construction. Implementation of these "standards" is identified in the State CEQA Guidelines Section 15064.5(3) as generally resulting in the reduction of an impact on an identified historic resource to a less than significant level.

State

California Environmental Quality Act

Section 15064.5 of the State CEQA Guidelines requires a Lead Agency to determine whether a project would have a significant effect on one or more historical resources. A "historical resource" is defined as a resource listed in or determined to be eligible for listing in the CRHR (PRC 21084.1); a resource included in a local register of historical resources (14 *California Code of Regulations* [CCR] Section 15064.5[a][2]); or any object, building, structure, site, area, place, record, or manuscript that a Lead Agency determines to be historically significant (14 CCR 15064.5[a][3]). The definitions of "historic" for CEQA purposes have been summarized by the California appellate courts as including mandatory, presumptive, and discretionary categories.

Projects that affect the historical significance of a resource that is listed in or has been formally determined eligible for listing in the CRHR are considered to have a significant effect on the environment. Impacts to cultural resources from a project are thus considered significant and adverse under Section 15064.5 (b) of the State CEQA Guidelines if the project (1) physically destroys, demolishes, relocates, or alters the resource or its immediate surroundings; or (2) materially impairs, demolishes or alters the physical characteristics of an historical resources that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; its inclusion in a local register of historical resources; its identification in an historical resources survey; or its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

California Register of Historical Resources

The Office of Historic Preservation (OHP) administers the CRHR, which was established in 1992 through Sections 5020 et seq. of the *California Public Resources Code* (PRC) to be "an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]).

The CRHR listing criteria focus on resources of State, rather than national, significance. The CRHR includes the following types of resources, either as an individual property or a contributor

to a historic district: (1) properties listed in or determined eligible for listing in the NRHP (automatically included); (2) California Historical Landmarks numbered 770 and higher (automatically included); (3) California Points of Historical Interest recommended for listing by the OHP; and (4) resources nominated for listing and determined eligible by meeting one or more of the CRHR criteria.

The CRHR consists of properties that are listed automatically, as well as those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed in the NRHP and those formally Determined Eligible for the NRHP;
- California Registered Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the CRHR.

The criteria for listing resources in the CRHR, which were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP (per the criteria listed at 36 CFR 60.4), are stated below.

> The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association and that:
>
> (1) Are associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or
>
> (2) Are associated with the lives of persons important to local, California, or national history; or
>
> (3) Embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master, or that possess high artistic values; or
>
> (4) Have yielded, or have the potential to yield, information important to the prehistory or history of the local area, California or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. The minimum age criterion for the CRHR is generally 50 years. Under the Special Considerations provided in the California Code of Regulations (Title 14, Division 3, Chapter 11.5, 4852[d][2]), resources less than 50 years old may be eligible for listing if “it can be demonstrated that sufficient time has passed to understand its historical importance”. Once listed, the historical resource is protected from any detrimental changes and any alterations, repairs, and additions must be reviewed and approved by the State Historical Resources Commission under the State Historical Building Code to ensure that the quality of the resource remains intact.

California Historical Building Code

The California State Historical Building Code (CHBC) (*California Code of Regulations*, Title 24, Part 8) is intended to save California's architectural heritage by recognizing the unique construction issues inherent in maintaining and adaptively reusing historic buildings. The CHBC's standards and regulations facilitate the rehabilitation or change of occupancy so as to preserve their original or restored elements and features; to encourage energy conservation and a cost-effective approach to preservation; and to provide for reasonable safety from fire, seismic forces, or other hazards for occupants and users of such buildings, structures, and properties and to provide reasonable availability and usability by the physically disabled. The 2016 triennial edition of the CHBC, effective January 1, 2017, is the currently adopted code. The City has adopted the CHBC by reference (Section 9.50 of the South Pasadena Municipal Code).

Mills Act

Enacted in 1972, the Mills Act (*California Government Code*, Article 12, Section 50280-50290; *California Revenue and Taxation Code*, Article 1.9, Sections 4.9-439.4) grants participating local governments (cities and counties) the authority to enter into contracts with owners of qualified historic properties, pursuant to the CHBC, who actively participate in the restoration and maintenance of their historic properties while receiving property tax relief.

Senate Bill 18

SB 18 (*California Government Code,* Section 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies. It establishes responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to tribes listed on the (NAHC's SB 18 Tribal Consultation List within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the *California Public Resources Code* that may be affected by the proposed adoption of or amendment to a general or specific plan. The Project is subject to SB 18. A description of the City's SB 18 process for the Project is provided in the analysis below.

Assembly Bill 52

AB 52 is applicable to projects that have filed a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) or notice of a Negative Declaration (ND) or Mitigated Negative Declaration (MND) on or after July 1, 2015. AB 52 requires that the tribes ask the lead agency to be contacted for consultation. Then, the lead agency must contact the tribes to initiate consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project and have requested such consultation prior to determining the type of CEQA documentation that is applicable to the project (i.e., EIR, ND, MND). AB 52 allows Tribes 30 days after receiving notification to request consultation. The lead agency then has 30 days to initiate consultation. Significant impacts to Tribal cultural resources are considered significant impacts to the environment. The Project is subject to AB 52. A description of the City's AB 52 process for the Project is provided in the analysis below.

Discovery of Human Remains

Section 7050.5 of the *California Health and Safety Code* provides for the disposition of accidentally discovered human remains. Section 7050.5 states that, if human remains are found, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains.

Section 5097.98 of the PRC states that, if the remains are determined by the Coroner to be of Native American origin, the Coroner must notify the NAHC within 24 hours which, in turn, must identify the person or persons it believes to be the most likely descendant (MLD) from the deceased Native American. The MLD shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The MLD's recommendation shall be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the landowner rejects the MLD's recommendations, the landowner shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (*California Public Resources Code,* Section 5097.98).

City

Cultural Heritage Ordinance

The City's Cultural Heritage Ordinance has been utilized since 1992 as a tool for implementing the City's preservation efforts. On July 19, 2017, the City Council adopted Ordinance No. 2315 that repealed the ordinance in place at that time and replaced it with a new ordinance that helps property and business owners gain a clear understanding of the Cultural Heritage Commission's (CHC) purpose and processes, assists the CHC with its decision making, and strengthens the City's legal framework to assure continued protection of its historic character and scale. The purpose of the Cultural Heritage Ordinance "is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of improvements, buildings, structures, signs, objects, features, sites, places, landscapes, and areas representing the City's architectural, artistic, cultural, engineering, aesthetic, historical, political, social, and other heritage" (South Pasadena 2017). The Cultural Heritage Ordinance also discusses the designation criteria for landmarks and historic districts in the City, and procedures for listing landmarks and districts on the South Pasadena Register of Landmarks and Historic Districts. Additionally, this ordinance mandates the establishment of a cultural resources inventory and defines the process for obtaining certificates of appropriateness, which authorize work that may affect cultural resources. The current Cultural Heritage Ordinance became effective August 2017.

3.4.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse cultural and tribal cultural resources impact if it would:

Threshold 3.4a: Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5;

Threshold 3.4b: Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5;

Threshold 3.4c: Disturb any human remains, including those interred outside of dedicated cemeteries; and/or

Threshold 3.4d: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

3.4.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P8.4 Make South Pasadena's arts, cultural, and heritage attractions visible and accessible to tourists and local audiences.

A8.4b Coordinate marketing so visitors and locals can readily find information about arts, heritage, and cultural attractions/events. Create a master calendar of arts events.

P8.5 Develop a cultural resource map and directory.

A8.5a Develop a South Pasadena cultural resources walking tour app for mobile devices.

P8.12 Promote designation of historic districts and local landmarks pursuant to the Cultural Heritage Ordinance.

A8.12a Complete evaluations of Modern properties on the study list from the Historic Resources Survey Report (2017). Such an effort should narrow the number of identified resources to determine significant districts and properties.

A8.12b Conduct theme studies for particular significant historical cultural groups to identify any associated properties (e.g., Japanese Americans).

A8.12c Where determined appropriate, consolidate small historic districts and "clusters" identified in early surveys to form larger historic districts that reflect neighborhood identity and cohesion.

P8.13 Maintain an updated Inventory of Cultural Resources to promote clarity for City staff and the public as to which properties are considered resources.

A8.13a Continue to add newly recognized properties to the Inventory of Cultural Resources.

A8.13b Based on field verification and/or research for each property as needed, eliminate from the inventory any addresses that no longer contain a historic resource, following the recommendations of the 2017 Historic Resources Survey Report.

P8.14 Develop strategies for the treatment of Planning Districts (identified in the Survey Update - e.g., Altos de Monterey).

P8.15 Support community-wide understanding and provide clear and up-to-date guidance as to how to apply the Secretary of the Interior's Standards for Rehabilitation among the Cultural Heritage Commission and the public, including property owners, architects and contractors.

A8.15a Update the Design Guidelines, which are the basis of design review for all properties in the City, whether historic or non-historic.

A8.15b Prepare separate Design Guidelines or Standards for each identified type of historic district.

A8.15c Maintain City-owned historic buildings and structures at a level that sets a standard for other owners of historic properties in the City.

A8.15d Study adjustments to the Zoning code that would allow or encourage adaptive reuse.

P8.16 Promote the conservation of older historic landscapes and natural features that contribute to the character of historic districts and landmarks.

A8.16a Assess the sustainability and long-term health of the City's canopy of street trees and trees in parks.

A8.16b Conduct a Cultural Landscape study of City parks and other significant landscapes and open spaces to identify their historic features and character.

A8.16c Encourage incorporation of natural features, existing trees, and archaeological sites into new development projects with sensitivity to ensure their protection and public enjoyment.

P8.17 Promote the importance of integrating new development with the historic character of neighboring historic buildings and districts.

A8.17a Develop and maintain design guidelines that sustain architectural continuity for infill development within existing historic districts through size, massing, scale, materials, and other relevant factors.

P8.18 Utilize technology and Internet resources to create useful portals with preservation information and resources.

A8.18a Maintain web pages with links to City resources and links to other State and National preservation web resources.

A8.18b Provide further information on City landmarks through the existing Google Map of Landmarks.

A8.18c Create maps of the properties on the Inventory of Historical Resources.

A8.18d Digitize, catalog, and make available historic documents from the Library's Local History Collection.

P8.19 Make historical information related to the City's historic built environment available on multiple platforms and in varied formats.

A8.19a Promote local knowledge and tourism with a mobile application for walking tours, perhaps starting with the National Register-listed commercial district.

A8.19b Create a curriculum available to local public and private elementary schools based on local architecture and history.

P8.20 Ensure that South Pasadena cultural organizations, with the strong support of our community, have the necessary resources to succeed.

A8.20a Coordinate arts and cultural leadership to implement the Cultural Strategic Plan.

A8.20b Convene a quarterly meeting of all arts and cultural providers to coordinate the individual efforts to maximize the benefits to the community.

A8.20c Partner with private and public donors, sponsors, and regional and national organizations to advocate for City funding for arts and culture; and collectively leverage City funding to support more creative endeavors by individuals and organizations.

A8.20d Explore community foundation fundraising model, which coordinates fundraising efforts for the arts in the community.

A8.20e Seek new grants based on demonstrated needs and priorities.

Downtown Specific Plan Update

P3.7 Support and ensure restoration and reuse of the historic Rialto Theater f.

A3.7a Renovate and protect the historic elements of the theater.

A3.7b Interim uses should be mindful of the historical assets and do no harm.

P8.5 Develop effective tools to promote arts, cultural, and heritage attractions in Downtown.

A8.5a Coordinate marketing so visitors and local residents can readily find information about Downtown arts, heritage and cultural attractions/events. Create a master calendar and post events and attractions on local and regional travel websites, travel apps, and social media sites.

A8.5b In the short-term, locally designate downtown as a Cultural District. In the long-term, pursue state-level Cultural District designation.

2021–2029 Housing Element

There are no Housing Element goals or policies related to cultural or tribal cultural resources.

3.4.6 ENVIRONMENTAL IMPACTS

Threshold 3.4a: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

As discussed above and articulated in the 2017 Survey, the City is a community that has numerous designated historical resources. At present there are 61 designated individual resources, 10 designated historic districts containing a collective total of 236 contributing properties, and 2,257 additional properties that have been identified as potentially eligible historical resources. In total, there are 2,718 properties (designated and potential resources at the federal, State, and/or local level) in the City that possess, or may possess, historical merit. All the five focus areas include one or more parcels that are designated or potentially historic, either as individual resources or contributors to a district.

The proposed General Plan and DTSP Update & 2021–2029 Housing Element Project would not directly cause a substantial adverse change in the significance of a historical resource. The policies and actions articulated in both documents represent broad, programmatic objectives, and

as such they do not call for targeted demolition or substantial alteration of a known historical resource in the City. However, it is possible that the Project would indirectly facilitate development activities, which may in turn indirectly cause a substantial adverse change in the significance of an individual historical resource and/or a historic district.

Since the City is an established community that was largely built out by World War II, the number of properties dating to the post-war era and more contemporary periods of history is generally less than other municipalities in Southern California. The survey upon which the 2017 Survey is predicated accounted for resources that were constructed through the year 1972. It is possible that, over time, there will be additional resources within the City that possess potential historical significance but are not currently identified in the 2017 Survey (i.e., constructed post-1972). One of the new provisions in the Cultural Preservation Ordinance updated in 2017 is to allow the Cultural Heritage Commission to review any proposed demolition of structures not listed in the 2017 Survey and greater than 45 years old. Properties may be determined to be eligible for listing as a historic resource based on various criteria, including properties that:

- Are associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or
- Are associated with the lives of persons important to local, California, or national history; or
- Embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master, or that possess high artistic values; or
- Have yielded, or have the potential to yield, information important to the prehistory or history of the local area, California or the nation.

There are other elements of the City's architectural and cultural heritage that contribute to its significance but are not accounted for in the 2017 Survey or other repositories of information. This includes trees and other landscape and hardscape features, and properties whose significance is derived primarily from their association with ethnic and cultural groups and is therefore somewhat intangible. These types of resources are often not accounted for in surveys and other conventional methods of inventorying historical properties. Like the contemporary resources discussed above, landscape features and resources with intangible significance may be adversely affected by the Project because they fall outside the purview of the City's policies and procedures related to historical resources.

The City's approach to future development has a focus on the preservation and maintenance of historical resources, balanced with required incorporation of housing opportunities. The approach includes awareness and understanding of the City's historical resources and best professional practices for managing said resources; encourage the designation of historical resources listed in the 2017 Survey; and ensure that development objectives are compatible with the character of the existing built environment. The City intends to preserve the integrity of historic districts, and to prevent infill development that is incongruent with the essential characteristics of historic districts. The General Plan Update includes a policy that promotes the importance of integrating new development with the historic character of neighboring historic buildings and districts; and the DTSP Update includes a policy that calls upon the City to preserve, enhance, and build on existing downtown assets to harness the power of place-making in the Downtown area. In doing so, it recognizes the importance of maintaining the historical character of the Downtown commercial core. The City's approach, in combination with the extensive regulatory framework of federal, State, and local regulations governing the treatment of historical resources, in particular the City's Cultural Heritage Ordinance, would contribute to the protection and maintenance of historical resources within the City.

The proposed General Plan Update policies facilitate the prevention of substantial alterations to historical resources. As listed above, this includes a policy that directs the City to develop and support an understanding among members of the community — including Cultural Heritage Commissioners, property owners, architects, contractors, and others — of how to apply the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Standards). When a development project conforms to the Standards, it is generally considered to not have a significant adverse impact on historical resources. Increasing the public's understanding of the Standards and their proper application would reduce inappropriate and substantial alterations to historical resources. If a project developed consistent with the General Plan and DTSP Update & 2021–2029 Housing Element culminates in the alteration of a historical resource, and the scope of work conforms to the Standards, it is generally considered a less than significant impact to the historical resource. There are policies that facilitate the prevention of demolition of historical resources by advocating for the designation of local landmarks and historic districts pursuant to the Cultural Heritage Ordinance. Since designation brings with it an enhanced level of protection and safeguards, this policy discourages the demolition of historical resources. The DTSP Update includes a policy that discourages the demolition of historical resources by supporting and ensuring restoration and reuse of the Rialto Theatre—one of the most valued assets to the Downtown's historic built environment.

The General Plan and DTSP Update & 2021–2029 Housing Element policies and actions listed above also encourage the identification and documentation of contemporary resources, significant landscape features, ethnic and cultural resources, and other resource types. The General Plan Update includes a policy that directs the City to establish an updated Inventory, in the future, to clarify which properties are considered to be cultural sssresources. Updating the 2017 Survey would ensure that resources that come of age over time are accounted for; it also calls for the development of theme studies relating to the history of locally significant cultural groups. Another General Plan Update policy accounts for landscapes by promoting the conservation of older historic landscapes and natural features that contribute to the character of historic districts and landmarks. General Plan and DTSP Update policies advocate for the promotion of the City's historical resources and its arts, cultural, and heritage attractions and the dissemination of information about these resources and attractions to City residents and members of the general public. These policies and actions are intended to augment awareness about the City's history and significant elements of its historic built environment. Enhancing awareness of local historical resources is anticipated to foster a sense of appreciation and civic pride, which in turn would aid in preventing their extensive alteration or demolition.

As discussed above, without safeguards it is possible that development under the General Plan and DTSP Update & 2021–2029 Housing Element could result in substantial adverse changes to historical resources. In the instance that a project results in the demolition of a historical resource, or substantial alterations to a historical resource that are not in conformance with the Standards, a significant impact would occur. Unless it is possible to relocate the resource in question to an appropriate receiver site, demolition is generally considered to be a significant unavoidable impact. However, the City's policies would facilitate the required increased hosing opportunities, while preventing adverse changes to and protection of historical resources. The City's established historic preservation policies and procedures, combined with existing State and local preservation laws and regulations, would adequately protect existing and future historical resources. There would be a less than significant impact to historical resources, and no mitigation is required.

Threshold 3.4b: Would the proposed General Plan and Specific Plan cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

The results of the 2020 SCCIC records search indicate that one previously recorded prehistoric archaeological site, P-19-003057, has been identified within the City; however, the archaeological site would not be impacted by Project-related activities. The proposed General Plan and DTSP Update & 2021–2029 Housing Element Project would not directly cause a substantial adverse change in the significance of an archaeological resource. The City is almost completely built out and is in a highly developed, urban area of Los Angeles County. Because there are few vacant parcels, future development would largely occur in areas of the City that are already developed and/or built out. As many of these sites are likely already disturbed, implementation of the General Plan and DTSP Update & 2021–2029 Housing Element is not anticipated to introduce a substantial amount of new development that would impact archaeological resources. However, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially cause the disturbance of previously unknown/unrecorded archaeological resources. In general, any development that requires grading, excavation of undisturbed or shallowly disturbed ground, or excavation to levels below current building foundations has the potential to encounter unknown archaeological resources.

Review and protection of archaeological resources are afforded under CEQA for individual development projects that would be accommodated by the General Plan and DTSP Update & 2021–2029 Housing Element, subject to discretionary actions that are implemented in accordance with the City's development review process. Per Section 21083.2(a) of the *Public Resources Code*, a lead agency is required to determine whether a development project may have a significant effect on archaeological resources. Specifically, pursuant to Section 15064.5(f) of the State CEQA Guidelines, should archaeological resources be found during ground-disturbing activities, a qualified archaeologist must make an immediate evaluation of the find to determine whether it is a "Tribal Cultural Resource" pursuant to Section 21074 of the *California Public Resources Code*, a "unique archaeological resource" pursuant to Section 21083.2(g) of the *California Public Resources* Code, or a buried "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. Tribal cultural resources are discussed further below under Threshold 3.4(d). If the archaeological resource is determined to be a "unique archaeological resource" or a "historical resource", the archaeologist shall formulate a mitigation plan in consultation with the City and the developer, when present, that satisfies the requirements of the above-referenced sections. If the archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource", s/he may record the site and submit the recordation form to the CHRIS at the SCCIC at California State University, Fullerton. Also, the General Plan Update includes an action that directs the City to encourage incorporation of natural features, existing trees, and archaeological sites into new development projects with sensitivity to ensure their protection, in support of the goal to maintain natural landscape elements that contribute to the historic character of the City. However, while the above-described sections of the *California Public Resources Code* provide a process to manage unanticipated archaeological resources, they are not presented as a single, cohesive requirement. It is possible that the appropriate processes may not be implemented due to lack of awareness. Therefore, MM CUL-1 requires that future development projects retain a qualified archaeologist to monitor excavation activities and salvage any encountered resources as necessary and appropriate.

Although soil-disturbing activities associated with development in accordance with the General Plan and DTSP Update & 2021–2029 Housing Element could unearth previously unknown

archaeological resources, compliance with existing regulations and MM CUL-1 would reduce potential impacts to archaeological resources to a less than significant level.

Threshold 3.4c: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

The proposed General Plan and DTSP Update & 2021–2029 Housing Element would not directly disturb any human remains, including those interred outside of dedicated cemeteries. As discussed under Threshold 3.4b, future development would largely occur in areas of the City that are already developed and/or built out. As many of these sites are likely already disturbed, implementation of the General Plan and DTSP Update & 2021–2029 Housing Element is not anticipated to introduce a substantial amount of new development that would potentially impact human remains. However, any development that requires grading, excavation of undisturbed or shallowly disturbed ground, or excavation to levels below current building foundations has the potential to encounter undiscovered unknown remains. Destruction of pre-historic or historic remains can result in the loss of information important to the history of the State, the region, or the immediate locality. Destruction of recent human remains could result in destruction of evidence associated with a crime.

If human remains are encountered, the discovery is required to comply with Section 5097.98 of the *California Public Resources Code* and Section 7050.5 of the *California Health and Safety Code*. This includes halting all work in the immediate vicinity of the discovery and notifying the County Coroner, who will determine whether the remains are of forensic interest. If it is determined that the remains are prehistoric, the NAHC will then be contacted to designate the MLD. Pursuant to Section 7050.5 of the *California Health and Safety Code*, the MLD will make their recommendation within 48-hours of being granted access to the site and is responsible for the ultimate disposition of the remains. The MLD's recommendation will be followed if feasible and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the landowner rejects the MLD's recommendations, the landowner will rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance.

Although soil-disturbing activities associated with development in accordance with the General Plan and DTSP Update & 2021–2029 Housing Element could encounter undiscovered human remains, compliance with existing regulations would reduce potential impacts to human remains to a less than significant level, and no mitigation is required.

Threshold 3.4d: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall

consider the significance of the resource to a California Native American tribe?

Pursuant to SB 18 and AB 52, the City initiated government-to-government consultation with NAHC-identified California Native American tribes and those tribes that have requested such consultation in order to identify, protect, and/or mitigate potential impacts to cultural places/resources. On March 13, 2018, the City initiated the offer of consultation under SB 18 and AB 52 by sending a letter to the Gabrieleno/Tongva Tribe; Gabrieleno/Tongva San Gabriel Band of Mission Indians; Gabrieleno Band of Mission Indians, Kizh Nation; and Soboba Band of Luiseño Indians. No tribes had requested to be notified of projects in the City pursuant to AB 52. In the absence of a Native American consultation list, these were the tribes identified by the City of Alhambra, an immediately adjacent jurisdiction, as having requested notification. These four tribes also received the Notice of Preparation (NOP) of this Draft PEIR dated January 23, 2018. There was no response from these tribes on the 2018 SB 18/AB 52 consultation letter or within the 2018 NOP review period.

On April 21, 2021, the City initiated consultation under SB 18 and AB 52, pursuant to the change in the Project and associated Recirculated NOP, by sending a letter to the Gabrieleno/Tongva San Gabriel Band of Mission Indians; Gabrieleno Band of Mission Indians, Kizh Nation; Gabrieleno/Tongva Tribe; Gabrieleno/Tongva Indians of California Tribal Council; and Soboba Band of Luiseño Indians. An inquiry was made to the NAHC by Psomas to request a review of the SLF database regarding the possibility of Native American cultural resources and/or sacred places in the Project vicinity that are not documented on other databases. The NAHC completed its SLF search on July 15, 2020. The results of the SLF check conducted through the NAHC was positive. Additionally, the Native American tribes that received the 2021 consultation letter are all those that were identified by the NAHC. These tribes also received the Recirculated NOP dated April 20, 2021. One tribe, the Gabrieleno/Tongva San Gabriel Band of Mission Indians (Gabrielino Tongva Tribe), responded to the consultation request.

On June 10, 2021, a virtual consultation between the City and the Gabrieleno Tongva Tribe was conducted. The Gabrielino Tongva Tribe indicated they have ancestral ties (i.e., cultural affiliation) to the area within the jurisdiction of the City of South Pasadena and claim to any Tribal Cultural Resources that may be encountered during future development projects within the City's jurisdiction. The Gabrielino Tongva Tribe is aware that archaeological resources may not have been recorded during prior development within the City's jurisdiction; therefore, the possibility of new archaeological discoveries does exist. The Gabrielino Tongva Tribe wished to have the opportunity to participate in Native American monitoring if mitigation measures or conditions for monitoring for tribal cultural resources are incorporated into future development projects within the City's jurisdiction. The Gabrielino Tongva Tribe also indicated that they believe a project applicant has the right to contract with a tribal group of their choosing for the purpose of Native American monitoring and is opposed to measures or conditions designating one particular Gabrielino Tribal group for the purpose of Native American monitoring (Dunlap 2021). There were no tribal cultural resources known to the Gabrielino Tongva Tribe apart from the site(s) associated with the NAHC's Sacred Lands File.

Additionally, as discussed under Thresholds 3.4a and 3.4d, when excavating in native (i.e., undisturbed) soils, there is always the potential to encounter unanticipated archaeological resources, which may include Tribal Cultural Resources and/or Native American remains. As discussed above, with compliance with existing regulations potential impacts to human remains would be less than significant. Additionally, implementation of regulations and MM CUL-1 would reduce potential impacts to unknown archaeological resources, including tribal cultural resources, to a less than significant level. No further mitigation is required.

3.4.7 CUMULATIVE IMPACTS

Development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element has the potential to disturb or destroy historical resources associated with the City's history and local culture. Historic structures that may be altered or demolished in and near the City would affect the cultural significance of an individual site or the structure, as well as incrementally diminish the City's historical context. Similarly, growth and development in the San Gabriel Valley may involve demolition of older structures that may be important to the valley's history. Demolition or alterations that do not follow the Secretary of the Interior's Standards would lead to the cumulative loss of historic resources in the San Gabriel Valley. Implementation of historic preservation ordinances by individual cities would preserve sites and structures of local importance. Compliance with the City's Cultural Heritage Ordinance and City policies and actions pertaining to the preservation of historic resources by the City of South Pasadena would prevent significant adverse impacts on historical resources in the City and avoid a cumulative contribution to the loss of historical resources. There would be a less than significant cumulative impact, and no mitigation is required.

Direct impacts to cultural resources are generally site specific. Although a project, in conjunction with the effects of past projects, other current projects, and probable future projects, could potentially result in the disturbance of prehistoric archaeological resource sites (including Tribal Cultural Resources and Native American remains) throughout the region, the City requires the mitigation of impacts to these resources (i.e., MM CUL-1). Growth and development in the San Gabriel Valley would also lead to new development on vacant and undeveloped lots. Future development and public and infrastructure projects not subject to CEQA could adversely affect in-situ archaeological resources, and cumulative impacts may occur. However, implementation of MM CUL-1 would prevent significant adverse impacts on archaeological resources in the City and thus, would avoid a cumulative contribution to the loss of archaeological resources in the Valley. There would be a less than significant cumulative impact to archaeological resources with implementation of MM CUL-1, and no further mitigation is required.

3.4.8 MITIGATION MEASURES

MM CUL-1 Prior to the issuance of a grading permit, Applicants for future development projects shall demonstrate to the City Community Development Department that a qualified Archaeologist has been retained by the applicant to attend the pre-grading meeting with the construction contractor to establish, based on the site plans, appropriate procedures for monitoring earth-moving activities during construction. The Archaeologist shall determine when monitoring of grading activities is needed. If any archaeological resources are discovered, construction activities must cease within 50 feet of the discovery, or as determined by the Archaeologist, and they shall be protected from further disturbance until the qualified Archaeologist evaluates them using standard archaeological protocols. The Archaeologist must first determine whether an archaeological resource uncovered during construction is a "Tribal Cultural Resources" pursuant to Section 21074 of the California Public Resources Code, or a "unique archaeological resource" pursuant to Section 21083.2(g) of the California Public Resources Code or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "Tribal Cultural Resource", "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a Mitigation Plan in consultation with the Applicant and the City Community Development Department that satisfies the requirements of

the above-listed Code sections. Upon approval of the Mitigation Plan by the City, the Project shall be implemented in compliance with the Plan.

If the Archaeologist determines that the resource is not a "Tribal Cultural Resource", "unique archaeological resource" or "historical resource," s/he shall record the site and submit the recordation form to the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the City and to the CHRIS at the SCCIC at the California State University, Fullerton.

3.4.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

3.4.10 REFERENCES

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3.5 ENERGY

3.5.1 METHODOLOGY

This section addresses energy use associated with the implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project).

Section 21100(b)(3) of the *California Public Resources Code* and Appendix F to the State CEQA Guidelines require a discussion of potential energy impacts of proposed projects. Appendix F states:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
>
> (1) Decreasing overall per capita energy consumption,
>
> (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and
>
> (3) Increasing reliance on renewable energy sources.

Appendix F of the State CEQA Guidelines also identifies that "EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy".

3.5.2 EXISTING CONDITIONS

Global climate change and the importance of energy in the need to reduce greenhouse gas (GHG) emissions are discussed in Section 3.7, Greenhouse Gas Emissions, of this Program Environmental Impact Report (PEIR). A 2016 analysis of the City of South Pasadena's (City) GHG emissions found that energy use is the second largest contributor, being approximately 39 percent of the total, with the energy use approximately equally divided between electricity and natural gas (South Pasadena 2020).

3.5.3 RELEVANT PROGRAMS AND REGULATIONS

State

The Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations [CCR]) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The CEC adopted the 2008 changes to the Building Energy Efficiency Standards in order to (1) "Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy" and (2) "Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its greenhouse gas emissions to 1990 levels by 2020". The current applicable standards are the 2022 Standards, effective January 1, 2023.

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California. The development of the CALGreen Code is intended to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the following construction practices: (1) planning and design; (2) energy efficiency; (3) water

efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

The CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others.

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill 1078. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. The CPUC is required to provide annual progress reports regarding the State's progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the State. Based on the November 2022 annual report, most retail sellers procured at or above the 35.75 percent RPS annual target for 2021; the large investor-owned utilities have executed renewable electricity contracts needed to meet the annual 2021 RPS target and are on track to meet the overall 2021-2024 compliance period requirement of 44 percent; nearly all Community Choice Aggregators (CCAs) have executed renewable electricity contracts to meet or exceed the annual 2021 RPS target and most are on track to meet the overall 2021-2024 compliance period requirement (CPUC 2022). Senate Bill 100 (California Public Utilities Code Sections 399.11 et seq.), enacted in 2018, updated the RPS, requiring electricity sales to California end-use customers to be 100 percent renewable energy and zero-carbon sources by the year 2045.

The California Advanced Clean Cars program (January 2012) is a new emissions-control program for model years 2015 through 2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package. The package includes elements to reduce smog-forming pollution, reduce GHG emissions, promote clean cars, and provide the fuels for clean cars (CARB 2012). To improve air quality, the California Air Resources Board (CARB) has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025 cars will emit 75 percent less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with EPA and NHTSA, adopted new GHG standards for model year 2017 to 2025 vehicles; the new standards are estimated to reduce GHG emissions by 34 percent in 2025. The Zero- Emissions Vehicle (ZEV) program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018 to 2025 model years. Technologies to achieve the new standards include engine and emission control advancements, wider application of advanced hybrid technologies and greater use of stronger and lighter materials. These new standards will result in lower fuel use over the life of the vehicle. The automobiles used by workers and residents

of the Project are currently fueled primarily by gasoline. However, projections indicate that there will be a transition to electric vehicles. The share of electric cars in total sales worldwide increased from approximately 4 percent in 2020 to approximately 14 percent in 2022 (IEA 2022). It is estimated that by the year 2040, 57 percent of all passenger vehicle sales will be battery electric vehicles (Energy5 2023). It is also estimated within the same projection that by 2040, 70 percent of the global fleet of buses will also be electrically fueled. As 56 percent of commercial vehicle sales are anticipated for light and medium commercial vehicles in the U.S.; consequently, fuel use for transportation by workers and residents is anticipated to transition from gasoline to electricity.

City of South Pasadena

South Pasadena Municipal Code

Section 36.540.030(c) of the South Pasadena Municipal Code (SPMC) states that the design of a subdivision for which a Tentative and Final Map are required by the zoning code shall provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivisions, in compliance with Section 66473.1 of the Subdivision Map Act. Sections 9.20 et. seq. of the SPMC sets forth procedures for permitting small residential rooftop solar energy systems.

South Pasadena Climate Action Plan

The City of South Pasadena adopted its first Climate Action Plan (CAP) on December 16, 2020. The CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. Energy is one of seven sectors for GHG reduction action identified in the CAP. The GHG reduction measures and supporting actions (called Plays and Moves, respectively, in the CAP) are shown in Table 3.5-1, South Pasadena Climate Action Plan Energy Section Measures (Plays) and Actions (Moves), beginning on this following page.

Clean Power Alliance

The City is a member of Clean Power Alliance (CPA), which offers 100 percent renewable electricity as its default option to customers (South Pasadena 2020b). CPA, a community choice aggregator serving 32 member jurisdictions in Los Angeles and Ventura counties, buys electricity and sells it to customers in its member jurisdictions (CPA 2020). The City has defaulted to 100 percent Green Power for residential uses and Clean Power for non-residential uses. A 100 percent Green Power source produces 100 percent carbon-free energy generation, whereas Clean Power has 50 percent carbon-free energy generation. Based on the CAP, approximately 4 percent of the electricity customers in the City have opted out of the CPA. Specifically, the total breakdown of residential and non-residential participation in this program is 82 percent with 100 percent Green Power, 10 percent Clean Power, 3 percent Lean Power with 40 percent carbon-free power generation, and 4 percent opting out. As such, most customers are choosing 100 percent carbon-free power.

TABLE 3.5-1
SOUTH PASADENA CLIMATE ACTION PLAN ENERGY SECTOR MEASURES (PLAYS) AND ACTIONS (MOVES)

Measures (Plays)	Actions (Moves)
E.1. Maximize the usage of renewable power within the community, by continuing to achieve an opt-out rate lower than 4% for the Clean Power Alliance.	E.1.a Monitor progress and perform public outreach and education campaigns highlighting the benefits of 100% renewable energy, including: • Monitoring opt-out rates on an annual basis • Tabling at community events • Establishing an informational resource page on the City website • Regular social media posts • Energy bill inserts
E.2. Electrify 100% of newly constructed buildings.	E.2.a. Develop a webpage and materials for display at City Hall promoting the benefits of electrification and resources that can assist with the fuel switching process.
	E.2.b Provide financial and technical resources, including hosting workforce development trainings for installers and building owners/operators to discuss benefits and technical requirements of electrification.
	E.2.c Perform regular internal trainings with planners and building officials on current state decarbonization goals and incentives available for electric homes.
	E.2.d Provide education around cooking with electric appliances, including demonstrations from chefs and/or local restaurants, as available.
	E.2.e Adopt an Electrification Readiness Reach Code per California Energy Commission (CEC) reach code requirements for all new buildings and accessory dwelling units which eliminates the piping of natural gas. In doing so the City will: • Engage with stakeholders, both internal stakeholders, such as City staff and officials, and external stakeholders, such as local developers regarding the purpose and impact of the reach code • Conduct a cost effectiveness study • Develop and draft an ordinance • Conduct public hearings, public notices, and formally adopt the ordinance • Submit the adopted ordinance to the California Energy Commission (CEC)
	E.2.f Adopt an ordinance that allows granting of minor allowances for certain site development standards when there is no practical ways to design a project to be all electric.
E.3 Electrify 5% of existing buildings by 2030 and 80% by 2045.	E.3.a Develop an existing building electrification permit tracking program to track annual progress in achieving the targeted electrification goal.
	E.3.b Keep an updated list of rebates and incentives available to residents who would like to convert their buildings to electric power.
	E.3.c Provide education on the potential energy savings and benefits of electric heat pumps for water heating and space heating when permits for replacement are obtained.
	E.3.d Work with Southern California Edison (SCE) and/or the Clean Power Alliance to provide rebates for residential replacement of natural gas powered air and water heating appliances with electric powered.
	E.3.e Promote water heater, space heating, and appliance (electric stoves/dryers) replacement programs and incentives (residential) at time of construction permit.

TABLE 3.5-1
SOUTH PASADENA CLIMATE ACTION PLAN ENERGY SECTOR MEASURES (PLAYS) AND ACTIONS (MOVES)

Measures (Plays)	Actions (Moves)
	E.3.f Perform an existing buildings analysis in order to understand the potential for electrification retrofitting in South Pasadena and establish a roadmap for eliminating natural gas from existing buildings.
	E.3.g Establish a comprehensive, coordinated education campaign focused towards property owners, landlords, property management companies, and occupants for reducing the use of natural gas in homes and businesses. Establish a shared understanding of existing incentives for electric appliances and upgrades, and how to access them, including SCE incentive programs and rebates.
	E.3.h Perform a cost effectiveness study for electrification retrofitting, including requirements for newly permitted HVAC/hot water heaters and other appliances to be electric.
	E.3.i Develop a best practices model based on the progress electrifying existing buildings in South Pasadena and outside of South Pasadena to significantly increase electrification post 2030.
E.4 Develop and promote reduced reliance on natural gas through increased clean energy systems that build off of renewable energy development, production, and storage.	E.4.a Conduct a Feasibility Study to assess cost and applicable locations for installation of battery back up systems or generators throughout the City.
	E.4.b Promote installation of storage technology in concert with renewable energy infrastructure through educational programs, outreach, and information provided via City platforms.
	E.4.c Conduct "micro*grid" Feasibility/Pilot Study in support of the General Plan.
	E.4.d In support of the General Plan, develop and implement a Solar Action Plan with a goal of meeting 50% of South Pasadena's power demand through solar by 2040.
	E.4.e In support of the 2018 2019 City Strategic Plan, develop a strategy and implementation schedule for the Renewable Energy Plan, after completion of the feasibility study.
	E.4.f Adopt a PV (Solar) Ordinance requiring newly constructed and majorly renovated multi family and commercial buildings to install PV systems with an annual output greater or equal to 25% of buildings electricity demand.
	E.4.g Require all new structures or major retrofits to be pre-wired for solar panels.
	E.4.h Work with various City departments to establish and streamline battery storage requirements to allow for easier implementation of these technologies throughout the City.
	E.4.i Work with home and business owners, including those in the historic districts, to identify and promote renewable energy demonstration projects to showcase the benefits.
	E.4.j Work with SCE and the CPA to develop a program and timeline for increasing resilience to power losses, including Public Safety Power Shutoffs (PSPS), and climate driven extreme weather events for low income, medically dependent, and elderly populations through installation of renewable energy and onsite energy storage with islanding capabilities, following appropriate project level environmental review.
Source: South Pasadena 2020	

3.5.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse energy impact if it would:

Threshold 3.5a: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Threshold 3.5b: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.5.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.2 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

A1.2 Continue to channel Federal, State and Local transportation funds to programs, and infrastructure improvements that reduce air pollution through the promotion of walking, biking, ride-sharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies.

P1.3 Promote the use of energy-efficient vehicles.

A1.3 Continue to control and reduce air pollution emissions from vehicles owned by the City by expanding the use of alternative fuel, electric, and hybrid vehicles in City fleets.

A1.3b Promote the installation of alternative fueling stations and electrical charging stations at businesses and residences.

P3.13 Implement energy efficient retrofit improvements in existing buildings consistent with the requirements of the City's Climate Action Plan.

A3.3 Support programs to provide loans to property owners for the installation of energy efficiency improvements or renewable energy devices.

P3.14 Establish standards for the inclusion of energy efficient design and renewable technologies in all new public and private projects.

A3.14a Require all new structures or major retrofits to be pre-wired for solar panels. Encourage battery back-up systems or generators in key locations throughout the city.

A3.14b Establish clean energy "micro-grids".

A3,14c Adopt zero net energy building codes.

A3,14d Provide builders, businesses, and residents with resources and information about energy efficiency and renewable energy technologies at the Building Permit counters and on the City's website.

A3.14e Develop a Solar Action Plan to meet 50% of South Pasadena's power demand through solar by 2040 and consider implementing recommendations of "Clean Energy Pathway for South Pasadena" and "Solar in South Pasadena: First Steps".

A3.14f Electrify South Pasadena's Vehicles. Develop a city fleet alternative fuel conversion policy, and use it to promote residents to convert as well.

A3.14g Install Electric Vehicle (EV) chargers at public facilities. Encourage property owners to install EV chargers at business and multi-family locations.

P4.8 Maintain a roadway system that provides for the efficient movement of goods and people in South Pasadena, while maintaining the community's character and quality of life.

A4.8b Require that development projects achieve no net increase in Vehicle Miles Traveled (VMT) per capita above current levels for comparable uses in the City of South Pasadena as determined in accordance with the City's Transportation Impact Analysis (TIA) Methodology (updated May 5, 2020).

P4.11 Facilitate safe and improved pedestrian and bicycle traffic between the Metro A Line station and major destinations.

A4.11a Study and develop a plan for sidewalk, signalization, crosswalk, bike ways, and other improvements on streets connecting the Metro A Line station with the downtown and surrounding neighborhoods (for example Mission Street at Prospect Avenue, El Centro Street between Mound and Edison Avenues, and Orange Grove Avenue at El Centro Street).

P4.12 Encourage and facilitate shared-ride options include e-hailing services, carshare, and bikeshare. Increase awareness of multimodal alternatives to driving to the Metro A Line station.

A4.12 In the near term, work with Metro and private partners (carshare companies) to identify "mobility hub" improvements that could be implemented at or near the Metro A Line station, such as additional, secure parking (lockers) for bicycles, a future bikeshare station and carshare vehicles stationed in the Mission Meridian Village Parking Garage.

Downtown Specific Plan Update

P1.1 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

P3.4 Encourage green projects and practices and support the inclusion of energy efficient design and renewable technologies in all new downtown public and private projects.

A3.4a Require new and/or renovated buildings to meet USGBC LEED Silver rating or equivalent and advance the City's sustainability goals.

A3.4b Incentivize sustainable living and business practices, both passive and active, that encourage energy efficiency, improve indoor air quality, and encourage water and resource conservation.

A3.4c Support solar panels on all new buildings.

A3.4d Explore opportunity to develop a clean energy micro-grids.

A3.4e Install Electric Vehicle (EV) chargers at public facilities in the Downtown area. Encourage property owners to install EV chargers at Downtown business and multifamily locations.

P4.1 Support street designs that emphasize safety and that accommodate all users, including pedestrians and cyclists.

A4.1a Ensure that streets are pedestrian-oriented, with complete sidewalks, regular crosswalks, and other measures to improve pedestrian safety and comfort such as compact corner radii, "bulb-out" sidewalk extensions at crosswalks, leading pedestrian intervals at signals, additional safety measures potentially including pedestrian-actuated signals at unsignalized crosswalks, other traffic calming measures, and increased investments in sidewalk maintenance and lighting.

P4.3 Reduce traffic congestion by reconfiguring outmoded interchanges and traffic signals rather than adding lanes to streets.

A4.3a Synchronize traffic signals wherever possible to optimize traffic flow at safe speeds.

A4.3b Work with Metro and the California Public Utilities Commission to reduce signal delay at the Metro A Line crossing of Mission Street and Meridian Avenue while maintaining safety.

P4.4 Explore options to improve transit service within South Pasadena, including City programs, public/private partnerships, and/or partnerships with Metro.

A.4.4a Maintain the City's existing Dial-A-Ride program.

A4.4b Initiate a partnership with Metro to pilot microtransit on-demand service using smartphone apps.

P4.7 Encourage and facilitate shared-ride options include e-hailing services, carshare and bikeshare.

A4.7a In the near term, work with Metro and private partners (carshare companies) to identify "mobility hub" improvements that could be implemented at or near the station, such as additional, secure parking (lockers) for bicycles, a future bikeshare station, and carshare vehicles stationed in the Mission Street/Meridian Avenue garage.

P8.3 Promote a new, balanced traffic culture including walking and cycling for all age groups.

2021–2029 Housing Element Implementation Programs

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

3.5.6 ENVIRONMENTAL IMPACTS

Threshold 3.5a: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction Energy Demand

As discussed in Section 3.2, Air Quality, because the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs identify potential future land uses and do not contain specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Future construction activities throughout the City are expected to require the use of construction equipment for grading, hauling, and building activities; all off-road construction equipment is assumed to use

diesel fuel. Construction also includes the vehicles of construction workers and vendors traveling to and from a particular project site and on-road haul trucks for the export of materials from site clearing and demolition and the export and import of soil for grading. Fuel would be consumed from construction worker, vendor, and delivery/haul trucks and light duty gasoline trucks.

Fuel energy consumed during construction would be temporary in nature and there are no unusual development characteristics in the City that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the region or State. Construction equipment would conform to applicable CARB emissions standards, which promote equipment fuel efficiencies. Construction contractors would be required to comply with the provisions of Section 2485 the California Code of Regulations (CCR), which prohibits diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction activities would be required to comply with all applicable local and State regulations related to recycling of construction and demolition debris. Therefore, construction of future projects would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operational Transportation

As shown in the General Plan and DTSP Update policies and actions above, the proposed Project would promote walking and biking as alternatives to automobile use through the goal of creating a multi-modal circulation network that is connected to available transit, which would provide convenient access to the employment centers in the City.

The northwesterly extension of the Metro Light Rail Line, the A Line, was established in 2003 and runs from East Los Angeles to the City of Azusa, via downtown Los Angeles. This light rail line passes through the City of South Pasadena, with a station at the intersection of Mission Street and Meridian Avenue. Metro is continuing to extend the Gold Line through the San Gabriel Valley, with the second phase of the Gold Line Foothill Extension Project running an additional 12 miles to a station in the City of Montclair.

As shown in Section 3.14, Transportation, of this PEIR, which analyzes a reasonably foreseeable buildout scenario for the Project, there would be lower vehicle miles traveled (VMT) per capita and lower VMT per service population (SP) when compared with the No Project (2040) scenario. Thus, vehicle operation would be more energy efficient with implementation of the Project.

When taking into consideration the City's compact land use pattern and the mixed-use nature of the proposed Project, as well as the proximity to transit, it is anticipated that both fuel usage and VMT would reduce over time. Independent projections of EV adoption for California show increases in EV utilization, with California leading in U.S. for Zero-Emission Vehicle (ZEV) sales. Of all ZEVs sold in 2022 in the U.S. (as of December 2022), California sales made up approximately 40 percent; and ZEVs make up an estimated 18.8 percent of all new car sales (California 2023). Additionally, Executive Order B-48-18, which went into effect January 2018, sets a target of five million ZEVs in California by 2030 (California 2018). According to CARB, this new order would require 40 percent of all vehicles sold in 2030 in California to be clean (Cooper 2018).

Future project development would be required to comply with all applicable local and State regulations related to alternative vehicle charging availability and EV use would also grow in accordance with market factors that support the turnover of the existing vehicle fleet to accommodate hybrid, EV, and ZEV. This includes all applicable CALGreen Code requirements,

which includes the installation of electric vehicle and plug-in hybrid vehicle charging stations to reduce fuel consumption from vehicle trips.

Because the Project would improve the VMT/capita and VMT/SP while accommodating anticipated growth, promote the use of multi-modal forms of transportation—which includes mass transit and non-automobile related transportation—accommodate alternative-fueled transportation options, as well as complementary mixed-use land use development, future use of energy due to increased traffic associated with Project buildout would not result in inefficient, wasteful, or unnecessary fuel consumption.

Operational Energy Demand

The proposed Project's emphasis on redevelopment primarily targeted to the proposed focus areas, which are adjacent to existing employment opportunities, public transit, recreational amenities, and services, is representative of the efficient land use development that would reduce vehicle trips and their associated energy use. As discussed in Section 2.6, Project Objectives, development of pedestrian-oriented mixed-use land use patterns that maximize the use of transit are fully integrated into the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

The Project would develop new residential and non-residential buildings that would meet the current Title 24 Energy Efficiency Standards and CALGreen standards in effect at the time of construction. The Project would require or promote all-electric design and solar electric generation on all new construction and would further encourage conversion from natural gas to electric and added solar electric generation in existing buildings. In addition, as discussed above, residents and businesses in the City have adopted electricity generation from the Clean Power Alliance that is overwhelmingly carbon free.

In conclusion, implementation of the General Plan and DTSP Update & 2021-2029 Housing Element Implementation Programs would result in less than significant impacts related to wasteful, inefficient, or unnecessary consumption of energy resources, during both construction or operation, and no mitigation is required.

Threshold 3.5b: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As described above, the would be required to comply with the State of California's Title 24 Building Standards and Title 24 Energy Efficiency Standards. Because the Project would comply with the latest energy efficiency standards and most local residential and non-residential uses would incorporate 100 percent renewable energy, the Project would not conflict with or obstruct a State plan for renewable energy or energy efficiency.

Table 3.5-2 lists CAP actions from Table 3.5-1 and some of the many General Plan Update and DTSP Update policies and actions from Section 3.5.5. As discussed for the analysis of long-term energy demand, when taking into consideration the City's compact land use pattern, redevelopment primarily targeted to the proposed focus areas, and proximity to transit, the Project would be consistent with the CAP and therefore would not conflict with or obstruct the local plan for renewable energy or energy efficiency.

3.5.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

The cumulative impacts related to energy use and efficiency are analyzed within the San Gabriel Valley (Valley). Future development throughout the Valley would generate additional energy demand and construction and operational fuel energy demand. Future development projects in the Valley would also need to comply with all applicable local and State energy efficiency and electric vehicle/plug-in hybrid vehicle charging stations. The electrification of the transportation sector is anticipated throughout California and would contribute to reduced fuel energy use related to future development throughout the Valley. Also, regional (i.e., Southern California Association of Governments) planning documents support a denser land use pattern with a focus on proximity to transit. In addition, most residential and non-residential land uses have opted for 100 percent carbon-neutral Green Power. Therefore, the Project's contribution to cumulative impacts would be a less than significant related to the efficient use of energy.

3.5.8 MITIGATION MEASURES

No significant adverse impacts related to energy have been identified with implementation of relevant goals, policies, and implementation actions in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. Therefore, no mitigation is required.

3.5.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative level.

3.5.10 REFERENCES

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3.6 GEOLOGY AND SOILS

3.6.1 METHODOLOGY

This section discusses the potential seismic and geologic hazards that may adversely be affected by implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project). Information presented in this section was derived from the U.S. Geological Survey, California Geological Survey (CGS), the Natural Resources Conservation Service Web Soil Survey, the existing *City of South Pasadena General Plan*, a paleontological records search conducted by the Natural History Museum of Los Angeles County (NHMLA) on May 3, 2021 (Appendix D), and other publicly available resources, as cited below.

3.6.2 EXISTING CONDITIONS

Regional and Local Geology

The City is located near the boundary between the Peninsular Ranges geomorphic province (on the south) and the Transverse Ranges geomorphic province (on the north). The east-west trending San Gabriel Mountains, located approximately five miles to the north-northwest, are part of the Transverse Ranges. The City is located along the west-central boundary of the San Gabriel Valley, which is bound on the north by the San Gabriel Mountains, on the west by the Repetto and Merced Hills, on the south by the Puente Hills, and on the east by the San Jose Hills.

Erosion of the San Gabriel Mountains due to water and gravity has formed fan-shaped alluvial wedges that fill the San Gabriel Valley, providing a basin for groundwater storage (i.e., the Raymond and San Gabriel Valley Basins). The majority of the City is underlain by Pleistocene- and Holocene-age alluvial deposits comprised primarily of sand, silt, and gravel. There are outcroppings of the Tertiary-age Topanga Formation, comprised of sandstone and siltstone, along the northern boundary and in the southwest portion of the City (CGS 1998).

Faults and Seismicity

Within Los Angeles County, numerous regional and local faults are capable of producing severe earthquakes (magnitude [M] of 6.0 or greater). Exhibit 3.6-1, Regional Fault Map, shows the relative location and general extent of faults in and near the City. Active and potentially active faults that cross the City include the Raymond fault (also known as the Raymond Hill fault) and the Upper Elysian Park blind thrust. Other faults located near the City (within approximately ten miles) include the Eagle Rock, Sierra Madre, Hollywood, and Santa Monica faults.

Raymond (also Raymond Hill) Fault

The east-west trending Raymond Fault passes through the northern portion of the City of South Pasadena, as well as the cities of San Marino, Pasadena, Arcadia, and Los Angeles. This fault is considered active and the CGS has established an Alquist-Priolo Earthquake Fault Zone on the entire segment, which extends approximately 500 feet on each side of the fault. Exhibit 3.6-2, Alquist-Priolo Earthquake Fault Zone, depicts the extent of the Alquist-Priolo Earthquake Fault Zone for the Raymond fault.

The Raymond Fault is the easternmost section of the generally east-west trending Malibu Coast–Santa Monica–Hollywood–Raymond Fault System. To the east, near Monrovia, it appears to merge into the central part of the Sierra Madre Fault Zone; to the west, it may step over or

merge with the Hollywood Fault (CGS 2017a,b). The Raymond Fault is predominantly a left-lateral fault and is thought to be capable of a 6.0 to 7.0 magnitude earthquake. The slip rate for the Raymond Fault is between 0.10 to 0.22 millimeters per year and an average recurrence interval of about 4,500 years (Caltech 2018).

Elysian Park Blind Thrust

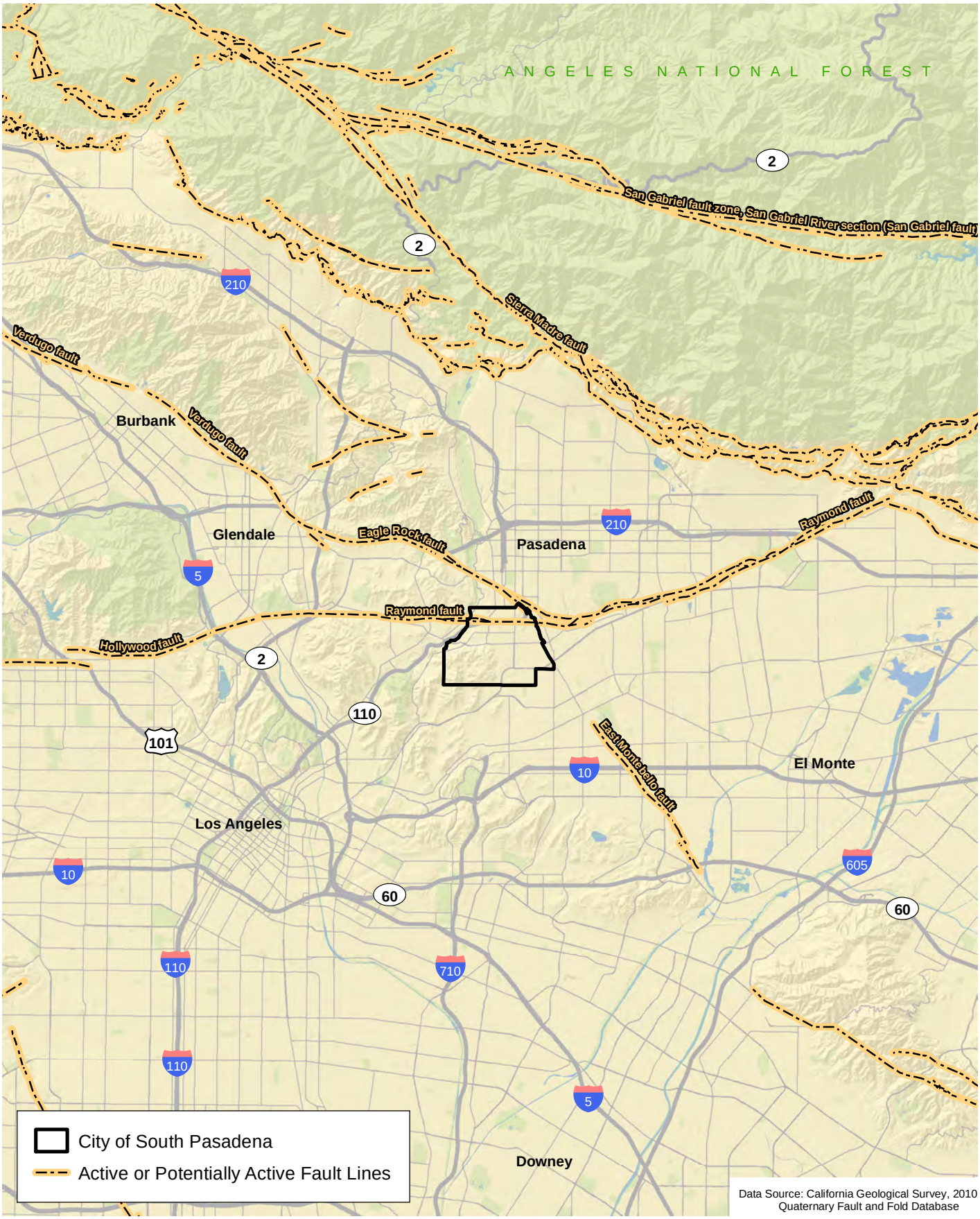
The Elysian Park Fault is a blind thrust fault that has been identified as a seismically active plane fault buried at a depth of approximately 10 kilometers beneath the City. It underlies most of the City, including the former 710 Freeway extension through South Pasadena. Because the Elysian Park Fault is buried and runs horizontally underground, it is not easily depicted on a map (South Pasadena 1998).

Paleontological Resources

Based on review of recent California Environmental Quality Act (CEQA) documentation for projects within the City and consultation with the City, there are no known paleontological resource sites within the City of South Pasadena (South Pasadena 2012, SPUSD 2016). According to the paleontological records search conducted by the NHMLA, three fossil localities were identified within the City, as shown in Table 3.6-1 below.

TABLE 3.6-1
FOSSIL LOCALITIES WITHIN THE CITY OF SOUTH PASADENA

Locality Number	Location	Formation	Taxa	Depth
LACM IP 2542	838 Lyndon Street, South Pasadena	Topanga Formation	Mantis shrimp (Squillidae)	Surface
LACM IP 23222	On Fair Oaks Avenue; north of the intersection of Fair Oaks and the Arroyo Seco Freeway	Unknown formation (Pliocene)	Invertebrates (unspecified)	Surface, along bluff next to sidewalk
LACM IP 24385	South Pasadena; on the east side of Fair Oaks Avenue just north the intersection of the Pasadena Freeway and Fair Oaks Avenue	Unknown formation (Pliocene)	Invertebrates (unspecified)	Unknown
Source: NHMLA 2021.				



Data Source: California Geological Survey, 2010 Quaternary Fault and Fold Database

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Regional Fault Map

Exhibit 3.6-1

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

N W E S

3 1.5 0 3 Miles

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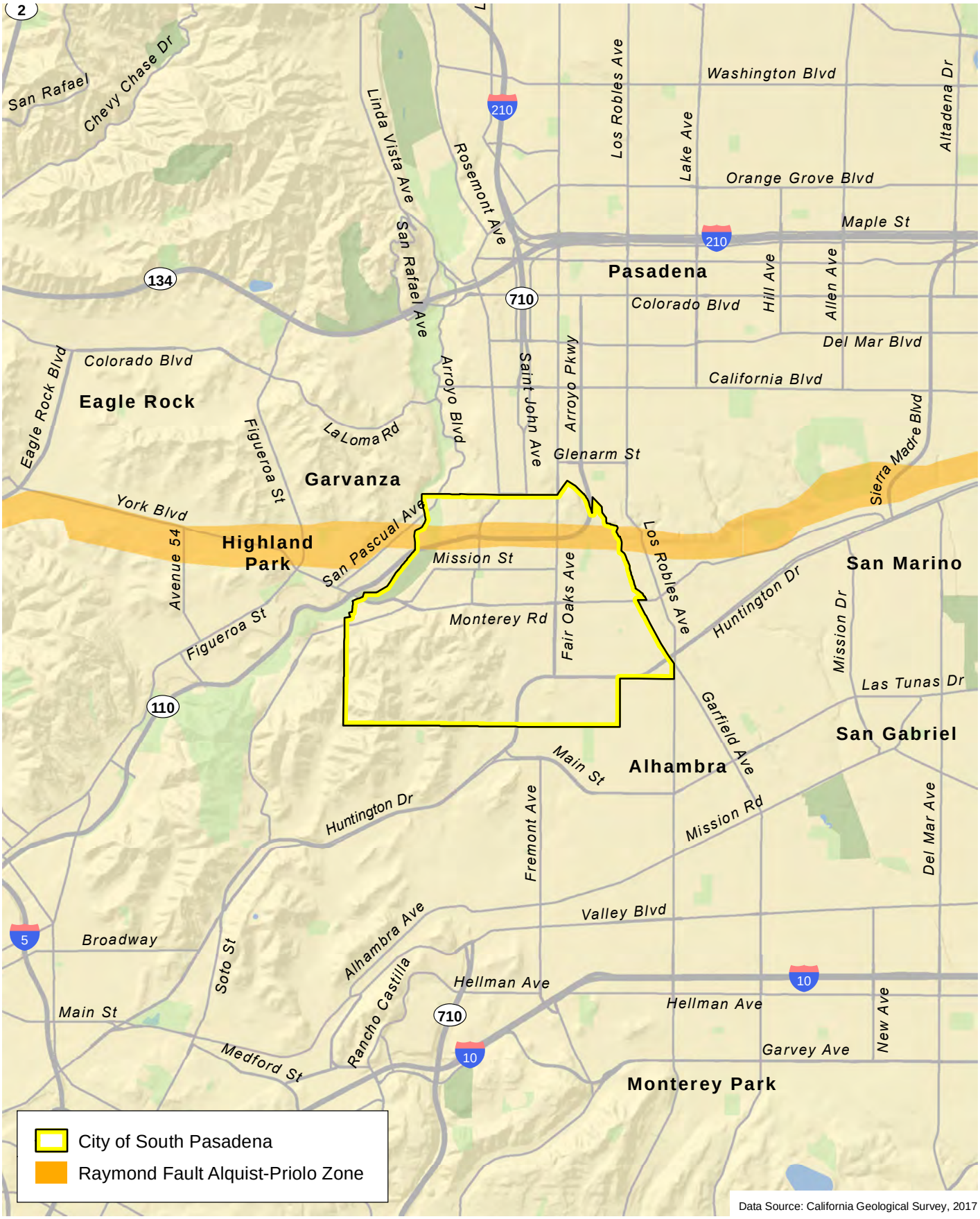

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Alquist-Priolo Earthquake Fault Zone

Exhibit 3.6-2

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

N W E S

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The following table shows six additional known localities in the collection of the NHMLA that are near the City:

TABLE 3.6-2
ADDITIONAL KNOWN LOCALITIES NEAR THE CITY OF SOUTH PASADENA

Locality Number	Location	Formation	Taxa	Depth
LACM VP CIT424	Near the intersection of Burleigh Road and Avenue 64	Topanga Formation	Herring (*Ganolytes*), perch-like fish (*Thyrsocles*), ray-finned fish (*Etringus*), and other unspecified	Unknown
LACM VO CIT342	Sparkletts property near 45th and Lincoln in Highland Park	Unknown formation (Pleistocene)	Mammoth (*Mammuthus*), Bison (*Bison*)	14 ft bgs
LACM VP 6934	Along the slope between Quail Drive and Pheasant Drive; East of Mt. Washington Elementary School	Monterey Formation (yellowish tan siltstone)	Baleen whale (*Mysticeti*)	found in hillslope rubble
LACM VP 7507	Near the intersection of San Fernando Road and Humbolt Street	Monterey Formation	Perch-like fish (*Thyrsocles kriegeri*)	31–32 meter bgs (collected during excavations of the Humboldt Street Sewer Shaft)
LACM VP 1023	Workman and Alhambra Streets	Unknown formation (Pleistocene)	Sabertooth cat (*Smilodon*), horse (*Equus*), deer (*Odocoileus*), Turkey (*Meleagris*)	Unknown (excavations for storm drains)
LACM VP 2032	Los Angeles Brickyard Mission Road and Daly Street	Unknown Formation (Pleistocene, silt & clay)	Mastodon (*Mammut*)	20–35 feet bgs

bgs: below ground surface
Source: NHMLA 2021.

3.6.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

International Building Code

The International Building Code (IBC) is the national model building code. The 2021 IBC is the most recent edition of the IBC, which was incorporated into the 2022 California Building Code, and currently applies to all structures being constructed in California. The national model codes are incorporated by reference into the California, County, and City building codes, discussed below.

State

California Building Code

The California Building Code is promulgated under Title 24 of the *California Code of Regulations*, Parts 1 through 12 (also known as the "California Building Standards Code" or CBC) and is administered by the California Building Standards Commission. The national model code standards adopted into Title 24 apply to all occupancies in California except for modifications adopted by State agencies and local governing bodies. The 2022 triennial edition incorporates the 2021 IBC, discussed above, and applies to all occupancies that apply for a building permit on or after January 1, 2023. The CBC may be adopted wholly or with revisions by local municipalities.

Alquist-Priolo Act of 1972

The Alquist-Priolo (AP) Earthquake Fault Zoning Act (AP Act) was adopted by the State of California in 1972 after the 1971 San Fernando Earthquake in order to mitigate the hazard of surface fault rupture along known active faults (California Public Resources Code [PRC], Section 2621 et. seq.). The purpose of the AP Act is to reduce the threat to life and property, specifically from surface fault rupture, by preventing the construction of buildings used for human occupancy on the surface trace of active faults. Under this Act, the State has defined an "active" fault as having had surface displacement during the past 11,000 years (Holocene time). This law directs the State Geologist to establish Earthquake Fault Zones (known as "Special Studies Zones" prior to January 1, 1994) in order to regulate development within designated hazard areas. City and County jurisdictions must require a geologic investigation to demonstrate that a proposed development project, which includes structures for human occupancy, is adequately set back (usually at least 50 feet) from an active fault prior to permitting. In accordance with the AP Act, the State has delineated "Earthquake Fault Zones" along identified active faults throughout the state.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (Act) was passed in 1990 and directs the State Department of Conservation to identify and map areas subject to earthquake hazards, such as liquefaction, earthquake-induced landslides, and amplified ground shaking (PRC 2690–2699.6). Passed by the State legislature after the 1989 Loma Prieta Earthquake, the Act was aimed at reducing the threat to public safety and minimizing potential loss of life and property in the event of a damaging earthquake event. Seismic Hazard Zone Maps are a product of the resultant Seismic Hazards Mapping Program and are produced to identify Zones of Required Investigation; most developments designed for human occupancy in these zones must conduct site-specific geotechnical investigations to identify the hazard and to develop appropriate mitigation measures prior to permitting by local jurisdictions.

Natural Hazards Disclosure Act

The Natural Hazards Disclosure Act (effective June 1, 1998) requires that sellers of real property and their agents provide prospective buyers with a disclosure statement when the property is located within one or more State-mapped hazard areas, including a Seismic Hazard Zone. The disclosure can be made as a Local Option Real Estate Transfer Disclosure Statement or a Natural Hazard Disclosure Statement.

California Plumbing Code

Part 5 of the California Building Code (Title 24 of the Code of Regulations) is the California Plumbing Code, which provides standards for the design and construction of water and sewer systems, storm drains and recycled water system in buildings. It prohibits connection to a septic tank in areas served by a public sewer system and requires the proper abandonment of septic tanks, cesspools, and seepage pits.

City

Municipal Code

Building Regulations

The City of South Pasadena has adopted by reference the County of Los Angeles Building Code (which adopts the 2022 California Building Code) as the City's building code in Section 9.1 et. seq. of the *South Pasadena Municipal Code* (SPMC). This is herein referred to as the City Building Code. Certain chapters or sections of the SPMC specifically pertain to construction in areas that present seismic risks and would apply to the Project. These requirements are described below.

Section 110.2, "Geotechnical Hazards", of the SPMC restricts building and grading activities in areas where geotechnical hazards of landslide, settlement, and slippage may be activated or increased as a result of Project activities. The City Building Official has the authority to require that Project applicants submit an Engineering Geology and/or Soils Engineering Report to indicate how the hazard will be eliminated or mitigated prior to the use or occupancy of the land.

Section 111, "Engineering Geology and Soils Engineering Reports", of the SPMC gives the Building Official the authority to require an Engineering Geology Report, a Soils Engineering Report, or both, in cases where such reports are considered essential for the evaluation of the site's safety. The Engineering Geology and/or Soils Engineering Reports must be prepared by a California-certified engineering geologist or California-licensed civil engineer, respectively, and must contain a finding regarding the safety of the site of the proposed work against hazard from landslide, settlement, or slippage and a finding regarding the effect that the proposed work will have on the geotechnical stability of the area outside the proposed work.

Section 113, "Earthquake Fault Maps", of the SPMC defines the additional requirements for construction of a building or structure near a known active earthquake fault, including, but not limited to, those shown on the Alquist-Priolo Earthquake Zones Map. If a Project is proposed near the trace of a known active fault, the SPMC defines additional geologic investigations to confirm the presence or absence of active earthquake faults. The results of the investigations, conclusions, and recommendations shall be presented in a geology report prepared by a geologist licensed by the California State Board for Geologists and Geophysicists.

Hillside Protection

Section 36.340 et. seq. of the SPMC defines additional requirements, beyond the City Building Code, for development on sites with an average slope of 20 percent or greater, except parcels within the Altos de Monterey (AM) overlay zone situated along Via Del Rey and adjoining streets in the south central portion of the City. These sites are instead subject to the AM Overlay District (Section 36.250.030 of the SPMC). There are no parcels identified for potential housing in the Suitable Sites within the AM Overlay District. Development in hillside areas requires a Hillside

Development Permit as a discretionary zoning approval of the City. Procedures for Hillside Development Permits are established in Section 36.410.065 of the City Municipal Code.

3.6.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse geology and soils impact if it would:

Threshold 3.6a: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction.

iv) Landslides;

Threshold 3.6b: Result in substantial soil erosion or the loss of topsoil;

Threshold 3.6c: 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;

Threshold 3.6d: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property; and/or

Threshold 3.6e: 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.

Threshold 3.6f: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.6.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P5.3 Proactively plan for rapid post-disaster recovery of local businesses.

A5.3a Update the City's Hazard Mitigation Plan to address rapid post-disaster within the loal business community.

P5.20 Support safe emergency evacuation for all hillside residents.

A5.20a Develop a rapid response team to respond in areas where regular emergency response vehicles can't access. This team will need specialized vehicles equipped to maneuver these parts of the city, while also containing the basic necessary equipment to provide emergency response.

A5.20b Periodically review and update the post-disaster recovery plan.

P7.3 Minimize risk of life and property damage resulting from seismic hazards, including earthquakes and landslides.

A7.3a Require all development in a geologic special studies zone to be set back 50 feet from each side of a mapped active fault trace.

A7.3b Develop a program to require structural reinforcement of all inventoried unreinforced masonry structures.

A7.3c Complete an inventory of soft story buildings in preparation for consideration of future regulations.

A7.3d Incorporate herein by reference the current South Pasadena Local Hazard Mitigation Plan (LHMP), in accordance with Assembly Bill 2140.

P7.5 Identify strategies to protect residents from geologic and groundwater hazards.

A7.5a Require a full site-specific geologic study of any hillside site within the purview of the hillside ordinance.

A7.5b Maintain regulations controlling grading and geologic study prior to construction.

A7.5c Grading of a slope that exceeds 30% is not allowed without sufficient engineering studies to demonstrate that such grading does not negatively impact the property, adjacent properties, or public safety.

P7.6 Maintain multi-jurisdictional programs to protect residents from the risks of fires, floods, seismic events, other natural hazards, and crime.

A7.6c Provide timely disaster updates and emergency notifications to community members, in multiple languages and formats as appropriate.

A7.6d Install signs in hillside neighborhoods directing residents to the closest evacuation route or shelter, with the ability to provide real-time information.

A7.6e Work with transit agencies and community-based organizations to create an evacuation plan for residents without access to personal vehicles.

A7.6f Upon the next revision of the Local Hazard Mitigation Plan, identify evacuation routes and their capacity, safety, and viability, and evacuation locations, under a range of emergency scenarios.

Downtown Specific Plan Update

P7.4 Minimize personal and property damage resulting from seismic hazards.

A7.4 Require structural reinforcement of all inventoried unreinforced masonry structures.

2021–2029 Housing Element

There are no Housing Element Implementation Programs goals or policies related to geology and soils.

3.6.6 ENVIRONMENTAL IMPACTS

Threshold 3.6a: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

Surface Rupture

As discussed above, active and potentially active faults that cross the City include the Raymond fault and the Upper Elysian Park blind thrust. Other faults located near the City (within approximately 10 miles) include the Eagle Rock, Sierra Madre, Hollywood, and Santa Monica faults. A potential for surface fault rupture hazard exists along the faults underlying the City. "Active" faults (demonstrated offset of Holocene materials [less than 10,000–12,000 years ago] or significant seismic activity) and "potentially active" faults (Pleistocene [greater than 12,000 but less than 1,600,000 years ago]), as defined by the CGS, must be considered as potential sources for fault rupture.

The CGS has identified an Alquist-Priolo Earthquake Fault Zone for the Raymond fault. The limits of the AP Zone within the City is shown on Exhibit 3.6-2. As shown, the AP Zone runs east-west through the northernmost portion of the City, largely overlying the State Route 110 alignment. Surface rupture movements on the Raymond fault could cause damage to overlying structures, utility infrastructure, and streets. The surface rupture of the Raymond fault presents a seismic hazard to the developments situated near the fault. Fault rupture hazards do not change for existing land uses and would not change under the General Plan and DTSP Update & 2021–2029 Housing Element. However, future development may be exposed to these hazards if located on the fault traces.

The northern portion of the City includes parcels located within the AP Zone. This area is currently developed with commercial/retail land uses, residential, and surface parking. A number of existing regulations prevent development over a fault trace or protect structures and infrastructure from surface rupture hazards. Specifically, compliance with AP Act requirements for detailed fault investigations would identify the presence of a fault trace on a proposed development or redevelopment site. As discussed above, the AP Act states that all jurisdictions require a geologic investigation to demonstrate that a proposed development project that includes structures for human occupancy is adequately set back (usually at least 50 feet) from an active fault prior to permitting. The extent of an AP Zone is not the area wherein surface rupture would necessarily occur, but the area in which a proposed development with human occupancy must complete additional, specific geologic investigation. Also, compliance with seismic design criteria in the City Building Code would promote the structural integrity of structures and infrastructure near faults to the maximum extent feasible under current engineering practice at the time of design and construction within the AP Zone. Through compliance with existing regulations, impacts related to surface rupture of a known active fault would be less than significant, and no mitigation is required.

Strong Ground Shaking

As with all of southern California, the City is located in a seismically active region and is at risk of strong seismic ground shaking. Earthquake-related hazards have the potential to cause serious damage to people and/or structures, including the risk of loss, injury, or death if the seismic event is large enough to generate short-duration, high peak ground accelerations or long-duration, moderate to high ground accelerations. Potential earthquake effects on structures and facilities within the City would depend upon the size (amount of energy release) and relative location of the earthquake in relation to a specific structure, and its location and underlying geologic conditions.

Future development of the remaining capacity of the City or pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would be subject to ground shaking hazard during earthquake events. The severity of ground shaking would depend on the magnitude of the earthquake, its distance to the City, and site geologic conditions. Local differences in subsurface conditions (e.g., density, water content, grain size, subgrade soil profile classification) could increase or decrease the effective shaking compared to another location within the City. Therefore, site-specific geological, geotechnical, soil engineering, and earthquake engineering studies are mandatory for all proposed structures in accordance with the City Building Code.

Earthquake-resistant design and materials used in new construction or seismic retrofitting must meet the current seismic engineering standards of the California Building Code Seismic Zone 4 requirements, as incorporated by reference in the City Building Code, in effect at the time of design and construction. Buildings constructed or retrofitted according to newer/updated standards would have the highest level of resistance to building collapse during a seismic event compared to existing structures, in particular older structures and/or unreinforced masonry buildings that have not received retrofitting and/or were constructed in accordance with older building codes. Future development or redevelopment within the areas subject to a Hillside Development Permit, largely in the southwest portion of the City, would also be required to prepare site-specific geotechnical investigations that include analysis of slope stability, erosion, subsidence, groundwater effects, and earthquakes as it pertains to the site's unique topography, to identify these hazards and provide appropriate construction recommendations, as necessary.

The General Plan Update includes policies and actions related to development in the City and in the hillside areas to ensure that regulations related to grading and geotechnical study are adopted and maintained, and that development in areas subject to the hillside ordinance are fully investigated. The General Plan Update also includes an action to continue the City's program to require structural reinforcement of all inventoried unreinforced masonry structures, as these buildings are the most susceptible to damage during a major earthquake. Through compliance with existing regulations and application of proposed policies and actions related to earthquake construction and retrofitting, there would be less than significant impacts related to strong ground shaking, and no mitigation is required.

Threshold 3.6a: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

The CGS broadly identifies areas of seismic-induced liquefaction and landslide risk pursuant to the Seismic Hazards Mapping Act. As shown on Exhibit 3.6-3, Potential Liquefaction and Landslide Hazard Zones, there are discrete areas designated as potentially susceptible to either liquefaction or landslide within the hilly area in the southwest portion of the City. These issues are discussed further below.

Liquefaction is defined as the transformation of a granular material from a solid state into a liquid state with vibration (most commonly seismic shaking) in the presence of water. It is a phenomenon that tends to occur in areas with shallow groundwater and where the soils are composed of loosely compacted granular materials. During an earthquake, saturated, cohesionless soil particles tend to decrease in volume (condense) because the vibration causes smaller particles to shift and fill in the voids (pores) between larger soil particles normally filled with water. As the soil condenses, less space is left for water, causing an increase in pore water pressure.[1] If the pore water pressure increases sufficiently, the soil loses its strength and transforms into a liquid state. This condition can lead to damage of overlying structures caused by loss of bearing, settlement, or subsidence of the soil; severe settlement of aboveground structures; and, in some cases, uplift of buried structures (e.g., large pipelines).

Landslides typically consist of shallow failures involving surficial soils and the underlying highly weathered bedrock in moderate to steep terrain. Structures, roadways, utilities, and the general population located on or below these hazard areas could be subject to severe damage or injury.

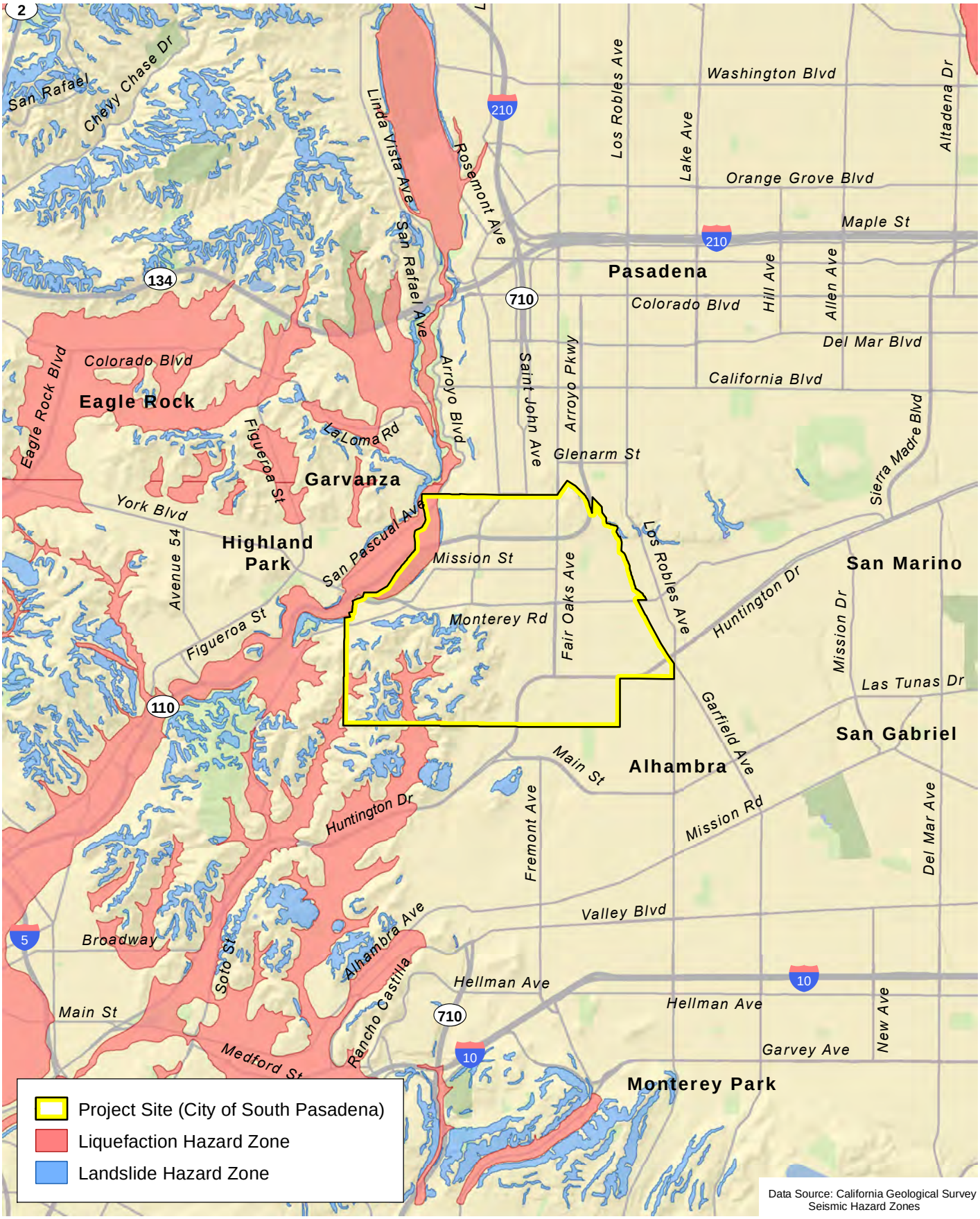
These potential geotechnical risks would be addressed by the site-specific geotechnical report required pursuant to both the City Building Code and the policies and actions in the General Plan Update. Through compliance with existing regulations and application of proposed policies and actions related to secondary seismic hazards, there would be less than significant impacts related to ground failure, including liquefaction and landslides, and no mitigation is required.

Threshold 3.6b: Would the Project result in substantial soil erosion or the loss of topsoil?

The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction activities. Construction activities produce loose soils, which would be subject to erosion if the surface areas were to be left uncovered and exposed to weather conditions. Grading, excavation, and trenching for construction may expose soils to short-term wind and water erosion, which could result in increased particulate matter (i.e., PM10) in the air and/or increased sediment runoff in surface waters.

For development or redevelopment projects over one acre, compliance with the current State Water Resources Control Board's National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Construction General Permit) would be required. Compliance with the Construction General Permit is also required pursuant to Section 23.12 of the SPMC. Section 23.13 of the SPMC requires that all construction activities not subject to the Construction General Permit

[1] Pore water is the water existing in the pores or spaces between grains in sedimentary materials.



Data Source: California Geological Survey
Seismic Hazard Zones

Potential Liquefaction and Landslide Hazard Zones

Exhibit 3.6-3

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

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comply with the requirements of the City's watershed management program, defined in Chapter 23, Stormwater and Urban Runoff Pollution Control, of the SPMC. Through compliance with State and local stormwater runoff permitting and management requirements, there would be less than significant impacts related to soil erosion, and no mitigation is required.

Threshold 3.6c: Would the Project 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?

Secondary seismic hazards related to the underlying geologic unit include several types of ground failure that can occur as a result of severe ground shaking. These hazards include landslides, collapse, ground lurching, shallow ground rupture, and liquefaction. The probability for each type of ground failure depends on the severity of the earthquake, the site's distance from the fault, the local topography, and subsoil and groundwater conditions, among other factors. In addition, there can be soil engineering characteristics inherent in the underlying sediments on a site that can adversely affect structures if not appropriately managed during construction, including subsidence, hydroconsolidation, and other forms of collapse.

Potential hazards to future development and redevelopment pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs due to the characteristics of the underlying geologic unit or soils would be identified during the preparation of required geotechnical investigations and/or soils reports (Section 36.540.090 of the SPMC) for individual projects, with recommendations on the soil expansion index that needs to be considered in the design and construction of structures and infrastructure. Typically, through compliance with existing regulations, there would be a less than significant impact related to location on expansive soils, and no mitigation is required.

Threshold 3.6d: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils are generally associated with soils, alluvium, and bedrock formations that contain clay minerals susceptible to expansion under wetting conditions and contraction under drying conditions. Depending upon the type and amount of clay present in a geologic deposit, volume changes (shrink and swell) can cause severe damage to slabs, foundations, and concrete flatwork.

Soil expansion hazards to future development and redevelopment pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would be identified during the preparation of required geotechnical investigations and/or soils reports (Section 36.540.090 of the SPMC) for individual, future projects. Specifically, recommendations on the soil expansion index that needs to be considered in the design and construction of structures and infrastructure would be part of these reports. Through compliance with existing regulations, there would be a less than significant impact related to location on expansive soils, and no mitigation is required.

Threshold 3.6e: Would the Project 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?

The vast majority of the City is served by the municipal sewer system. Future development and redevelopment would be required to connect to the public sewer system where existing sewer lines are available, as required under the California Plumbing Code. While the majority of the City is served by the sewer system, there are septic tanks that remain in the Altos de Monterey area in the southwest portion of the City. Redevelopment of a site with a septic tank would require abandonment of the septic tank and connection to the public sewer system under the California Plumbing Code. Also, compliance with Order No. R4-2004-0146 of the Los Angeles Regional Water Quality Control Board (RWQCB) is required to regulate the type of discharge; surface overflows; disposal of wastes in geologically unstable areas; odors; and groundwater pollution, including annual inspections, connection to public sewer system within six months of availability, and monitoring. The regulations protect shallow groundwater and adjacent water bodies. Through compliance with regulations, no development or redevelopment under the General Plan Update would use septic tanks or alternative wastewater disposal systems. There would be no impact, and no mitigation is required.

Threshold 3.6f: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not directly destroy a unique paleontological resource or unique geologic feature. Future development would largely occur in areas of the City that are already developed and/or built out. However, as discussed above in Section 3.6.2, based on the records search conducted by the NHMLA, nine fossil localities have been identified within or near the City.

Therefore, as with archaeological resources, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, could potentially cause the disturbance of previously unknown paleontological resources. In general, any development that requires grading, excavation of undisturbed or shallowly disturbed ground, or excavation to levels below current building foundations has the potential to encounter unknown paleontological resources.

Unlike archaeological resources, there are no provisions in CEQA to afford protection of paleontological resources for individual development projects that would be accommodated by the General Plan and DTSP Update & 2021–2029 Housing Element. Therefore, in the event an unanticipated paleontological resource is encountered, MM GEO-1 would require that ground-disturbing activities are halted, and a qualified paleontologist would be hired to evaluate the find. If the resource is determined to be significant, the paleontologist shall determine appropriate actions, in consultation with the City and the developer (if present), for further exploration and/or salvage. With implementation of MM GEO-1, there would be less than significant impacts to potential paleontological resources.

3.6.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Geology and soils impacts are generally site specific and there is typically little, if any, cumulative relationship between the development of individual projects on separate sites. As such, one development would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion) at another site, nor change geologic conditions or hazards at off-site locations.

Geological and seismic conditions are regional in nature and affect large areas, rather than individual parcels. Therefore, future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element, as well as development within the San Gabriel Valley, would be subject to geologic hazards including development potentially affected by faults, ground shaking, surface rupture, liquefaction, landslides, subsidence, soil collapse, expansive soils, and other geologic issues.

Compliance with applicable State and local regulations would be required of all development within the San Gabriel Valley. Individual projects would be designed and built in accordance with applicable standards in the CBC and the individual building regulations of local jurisdictions, including pertinent seismic design criteria. Site-specific geologic hazards would be addressed by the geotechnical investigation required by individual cities and the County for each development proposal. Geotechnical investigations would identify the geologic and seismic characteristics on a site and provide guidelines for engineering design and construction to provide for the structural integrity of proposed development. Compliance with applicable State and local regulations and standard engineering practices related to seismic and geologic hazard reductions would prevent significant adverse impacts associated with geologic hazards, and impacts associated with the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not be cumulatively considerable.

Development projects in the San Gabriel Valley would connect to the public sewer system where available but may utilize septic tanks or alternative wastewater disposal systems in areas without sewer service. Compliance with the Los Angeles RWQCB regulations and the California Plumbing Code would prevent hazards associated with soils incapable of supporting septic systems. Therefore, compliance with applicable State and local regulations and standard engineering practices related to septic hazard reductions would prevent significant adverse impacts. Therefore, impacts associated with the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not be cumulatively considerable.

Direct impacts to paleontological resources are generally site specific. Although a project, in conjunction with the effects of past projects, other current projects, and probable future projects, could potentially result in the disturbance of paleontological resources throughout the region, the City requires the mitigation of impacts to these resources (i.e., MM GEO-1). Growth and development in the San Gabriel Valley would also lead to new development on vacant and undeveloped lots. Future development and public and infrastructure projects not subject to CEQA could adversely affect in-situ paleontological resources, and cumulative impacts may occur. However, implementation of MM GEO-1 would prevent significant adverse impacts on paleontological resources in the City and thus, would avoid a cumulative contribution to the loss of paleontological resources in the Valley. There would be a less than significant cumulative impact to paleontological resources with implementation of MM GEO-1, and no further mitigation is required.

3.6.8 MITIGATION MEASURES

MM GEO-1 Should potential paleontological resources be found during ground-disturbing activities for any individual project implemented under the General Plan and DTSP Update & 2021–2029 Housing Element, ground-disturbing activity in the immediate vicinity of the find shall be temporarily halted and a qualified paleontologist will be hired to evaluate the resource. If the potential resource is found not to be significant by the paleontologist, construction activity in the area of the find can resume. If the resource is found to be significant, the paleontologist shall determine appropriate actions, in consultation with the City and the developer (if present), for further exploration and/or salvage. A Disposition of the Recovered Paleontological Resources and Mitigation Report shall be prepared by the qualified paleontologist and submitted to the City. Any recovered fossils shall be deposited in an accredited institution or museum, such as the Natural History Museum of Los Angeles County.

3.6.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative basis.

3.6.10 REFERENCES

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3.7 GREENHOUSE GAS EMISSIONS

3.7.1 METHODOLOGY

This section addresses greenhouse gas (GHG) emissions associated with the implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Project and their relationship to climate change.

As discussed in Section 3.2, Air Quality, in 2022 the latest version of the California Emissions Estimator Model™ (CalEEMod™), version 2022.1, was released (CAPCOA 2023). Since then, various model updates have been released, the most recent being Version 2022.1.1.14, released on June 15, 2023. The purpose of this model is to calculate construction-source and operational-source air pollutants (addressed in Section 3.2 of this Program Environmental Impact Report [PEIR]) and GHG emissions from direct and indirect sources; and quantify applicable criteria pollutant and GHG emissions reductions achieved from mitigation measures. The model calculates emissions of GHGs carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) and other GHGs and combines these emissions to calculate CO_2 equivalent (CO_2e). CalEEMod version 2022.1.1.14 was used to estimate the air pollutant emissions associated with buildout of the Project. For this analysis, the results are expressed in metric tons of CO_2e per year ($MTCO_2e$/year). The inputs and data for the GHG modeling are described below, in Section 3.2 of this PEIR, and in Appendix B.

3.7.2 EXISTING CONDITIONS

Global Climate Change and Greenhouse Gases

Climate change is a recorded change in the Earth's average weather measured by variables such as wind patterns, storms, precipitation, and temperature. Historical records show that global temperature changes have occurred naturally in the past, such as during previous ice ages. The year 2020 ranks as Earth's hottest year on record, tying 2016 (NASA 2021).[1] And the Earth's global average temperature in 2021 tied with 2018 as the sixth warmest on record. Collectively, the past eight years are the warmest years since modern recordkeeping began in 1880 (NASA 2022). Overall, Earth's average temperature has risen more than 2 degrees Fahrenheit since the 1880s. Continuing the planet's long-term warming trend, 2020's globally averaged temperature was 1.84 degrees Fahrenheit (1.02 degrees Celsius) warmer than the baseline 1951-1980 mean (NASA 2021).

The global atmospheric concentration of carbon dioxide (CO_2), the most abundant GHG, has increased from a pre-industrial (roughly 1750) value of about 280 parts per million (ppm) to a seasonally-adjusted 418.39 ppm in July 2022, primarily due to fossil fuel use, with land use change providing a significant but smaller contribution (ESRL 2022a). The National Oceanic and Atmospheric Administration (NOAA) Annual Greenhouse Gas Index (AGGI) for 2021 was 1.49, which means the warming influence of GHGs has increased 49 percent since 1990. It took about 240 years for the AGGI to go from zero to one, and 31 years to increase by another 49 percent (ESRL 2022b).

[1] A separate, independent analysis by the National Oceanic and Atmospheric Administration (NOAA) concluded that 2020 was the second-warmest year in their record, behind 2016 (NASA 2022).

Greenhouse Gases

GHGs are global pollutants and are therefore unlike criteria air pollutants such as ozone (O_3), particulate matter (PM10 and PM2.5), and toxic air contaminants (TACs), which are pollutants of regional and local concern (see Section 3.2, Air Quality, of this PEIR). While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe. Therefore, GHG effects are global, as opposed to the local and/or regional air quality effects of criteria air pollutant and TAC emissions.

GHGs, as defined under California's Assembly Bill (AB) 32, include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, as CH_4 and N_2O are approximately 25 and 298 times (respectively) more powerful than CO_2 in their ability to trap heat in the atmosphere, they have GWPs of 25 and 298, respectively (CO_2 has a GWP of 1). Carbon dioxide equivalent (CO_2e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e.

General Environmental Effects of Global Climate Change

Executive Order S-3-05 mandates the preparation of biennial science assessment reports on climate change impacts and adaptation options for California. Executive Order S-13-08 directs the California Natural Resources Agency (CNRA) to develop a State Climate Adaptation Strategy and to provide State land use planning guidance related to sea level rise and other climate change impacts. Current reports resulting from these directed actions are the *Climate Action Team Report to the Governor and Legislature* and the *California Climate Adaptation Strategy* (CalEPA 2010; CNRA 2009a). These studies report that global warming in California is anticipated to impact resources including, but not limited to, those discussed below.

- **Public Health.** Many Californians currently experience the worst air quality in the nation, and climate change is expected to make matters worse. Higher temperatures would increase the frequency, duration, and intensity of conditions conducive to air pollution formation. Air quality could be further compromised by more frequent wildfires, which emit fine particulate matter that can travel long distances. Rising temperatures and more frequent heat waves would increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress. Climate change may also increase asthma rates and the spread of infectious diseases and their vectors, as well as challenge food and water supplies. Children, the elderly, people with chronic heart or lung disease, outdoor workers, people who exercise outdoors and the economically disadvantaged would be particularly vulnerable to these changes. In addition, more frequent extreme weather events could also result in increased injuries and deaths from these phenomena.
- **Energy.** Increasing mean temperature and more frequent heat waves will drive up demand for cooling in summer; this new energy demand will only be partially offset by decreased demand for heating in winter. Hydropower, which currently provides 15 percent of in-state generation, would be threatened by declining snowpack, which serves as a natural reservoir for hydropower generation in the spring and summer. Winter storms,

earlier snowmelt, and greater runoff may combine to cause flooding, which could, in turn, damage transmission lines and cause power outages.

- **Water Resources.** Rising temperatures, less precipitation, and more precipitation falling as rain instead of snow could severely diminish snowpack. Because the Sierra Nevada snowpack provides most of California's available water, this potential loss would increase the risk of summer water shortages and would hamper water distribution and hydropower generation. The diminished snowpack would also nearly eliminate all skiing and other snow-related recreation. Rising sea levels would push saltwater into California's estuaries, wetlands, and groundwater aquifers, threatening the water quality and reliability in the Sacramento/San Joaquin River Delta—a major California freshwater supply. Extreme precipitation and flooding could also damage water quality by creating sudden increases in runoff. Moreover, warming would increase evapotranspiration rates from plants, soil, and open water surfaces, which would result in greater demand for irrigation. Overall, climate change would reduce California's water supplies even as its growing population requires additional resources.
- **Sea Level and Flooding.** Sea level at California's coasts is expected to rise by 11 to 18 inches above 2000 levels by 2050 and by 23 to 55 inches by 2100. If realized, these increases would create more frequent and higher storm surges; would erode some coastal areas; and would increase pressure on existing levees. These increases would create a greater risk of flooding in previously untouched inland areas. Consequently, continued development in vulnerable coastal areas would put more people and infrastructure at risk.
- **Agriculture.** Although higher CO_2 levels can stimulate plant production and increase plant water-use efficiency, in the long-term, climate change would reduce the quantity and quality of agricultural products statewide. As temperatures rise, farmers will face greater water demand for crops and a less reliable water supply, as well as increased competition from urban water users. Sea level rise may cause saltwater intrusion in the Delta region, making it difficult to raise certain crops. Rising temperatures will likely aggravate O_3 pollution, interfering with plant growth and making plants more susceptible to disease and pests. In addition, warming would reduce the number of colder hours needed for fruit and nut production; would shift pest and weed ranges; would alter crop-pollinator timing; and would increase the frequency of droughts, heat waves, and floods. Higher average temperatures would also increase mortality and decrease productivity in livestock.
- **Forestry.** California timber production has declined over the past few decades due, in part, to warming and increased wildfires. While further warming may increase production for some species in some locations, climate change is expected to reduce overall forest growth. Increasing average temperatures and drought frequency would result in more wildfires and greater burned areas, while less frequent and more intense rainfall would increase soil erosion and landslides. Higher temperatures and less water would force many tree species to shift their ranges; those that run out of livable habitat may die out. Pests, diseases, and invasive species may also colonize new areas, further challenging forest health and biodiversity.
- **Ecosystems.** Rising average temperatures would subject plants and animals to greater thermal stress, causing some species to adapt or shift their ranges, while others may face extinction. Invasive species may also shift their ranges, threatening native species. Changing temperatures would also alter the timing of plant flowering and insect emergence, damaging species' ability to reproduce. Changing precipitation patterns would impact aquatic and riparian ecosystems by reducing snowpack, stream flow, and groundwater, while increasing the frequency of droughts, floods, and wildfires. As sea

levels rise, some coastal habitats may be permanently flooded or eroded, and saltwater intrusion into freshwater resources may threaten terrestrial species. Changes in ocean circulation and temperature, ocean acidification, and increased runoff and sedimentation would threaten pelagic species. In sum, continued global warming would alter natural ecosystems and threaten California's biological diversity.

Global, National, and State Contributions to Greenhouse Gas Emissions

Table 3.7-1 compares the magnitude of GHG emissions on the global, national, State, regional, and local scales. It shows the relative estimated quantities of GHG emissions from worldwide to South Pasadena. CO_2e emissions are commonly expressed as metric tons of carbon dioxide equivalent ($MTCO_2e$). Larger quantities of emissions, such as on the State or global scale, are expressed as million metric tons of carbon dioxide equivalent ($MMTCO_2e$). Metric tons may also be stated as "tonnes".

TABLE 3.7-1
COMPARISON OF WORLDWIDE GREENHOUSE GAS EMISSIONS

Area and Data Year	Annual GHG Emissions ($MMTCO_2e$)
World (2019)	49,758
United States (2019)	5,771
California (2019)	418
SCAG region (2020)	216
South Pasadena (2016)	0.125
GHG: greenhouse gas; $MMTCO_2e$: million metric tons of carbon dioxide equivalent Source: Climate Watch 2022 (world & U.S.); CARB 2022 (California); SCAG 2020 (SCAG region); South Pasadena 2020 (City).	

As shown, the U.S. contributes approximately 11.6 percent of worldwide GHG emissions per year and California contributes approximately 0.8 percent. The SCAG region, which includes the counties of Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial contributes approximately 52 percent of California's GHG emissions. The City of South Pasadena's (City) GHG emissions are approximately 0.06 percent (1/17) of the SCAG region's emissions.

The most common GHG is CO_2, which constitutes approximately 80 and 83 percent of all GHG emissions in the U.S. and California, respectively. The primary contributors to California GHG emissions are (1) transportation; (2) industrial uses; and (3) electric power production from both in-State and out-of-State sources. The primary contributors to the City's GHG emissions are (1) transportation–54 percent and (2) energy–39 percent, approximately equally divided between electricity and natural gas.

3.7.3 RELEVANT PROGRAMS AND REGULATIONS

There are a multitude of federal and State regulations and programs related to GHG emissions, many of which overlap in goals and/or requirements. Those listed below most directly relate to emissions that would be expected to result from growth at the city and county level, primarily mobile (vehicle) emissions and building-related energy efficiency and alternative energy use.

Federal

U.S. Environmental Protection Agency Findings

On December 7, 2009, the U.S. Environmental Protection Agency (USEPA) Administrator signed two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act (CAA). The findings do not themselves impose any requirements on industry or other entities. However, this action is a prerequisite to finalizing the USEPA's proposed GHG emission standards for light-duty vehicles (USEPA 2021). A light-duty vehicle is defined as any motor vehicle with a gross vehicle weight of 6,000 pounds or less (CARB 2021b).

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have been working together on developing a National Program of regulations to reduce GHG emissions and to improve the fuel economy of light-duty vehicles. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. On October 15, 2012, the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require these vehicles to meet an estimated combined average emissions level of 295 grams of CO_2 per mile by 2012, decreasing to 250 grams per mile by 2016, and finally to an average industry fleet-wide level of 163 grams per mile in model year 2025. The 2016 standard is equivalent to 35.5 miles per gallon (mpg) and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will occur due to air conditioning technology improvements (i.e., they will leak less) and due to the use of alternative refrigerants, which would not contribute to fuel economy. These standards would cut GHG emissions by an estimated 2 billion metric tons and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025). The combined USEPA GHG standards and NHTSA Corporate Average Fuel Economy (CAFE) standards resolve previously conflicting requirements under both federal programs and the standards of the State of California and other States that have adopted the California standards (USEPA and NHTSA 2012).

On September 19, 2019, NHTSA and the USEPA issued a final action entitled the "One National Program Rule" to enable the federal government to provide nationwide uniform fuel economy and greenhouse gas emission standards for automobile and light duty trucks. This action finalizes critical parts of the Safer, Affordable, Fuel-Efficient (SAFE) Vehicles Rule that was first proposed in August 2018. In this proposal, the agencies proposed new and amended greenhouse gas (GHG) and Corporate Average Fuel Economy (CAFE) standards for model year 2021 to 2026 light duty vehicles (USEPA and NHTSA 2019). In this action, USEPA withdrew the Clean Air Act waiver that had been granted to the State of California in January 2013 for the State's Advanced Clean Car program with respect to GHG and Zero Emission Vehicle (ZEV) elements. In November 2019, California, 21 other states, the District of Columbia, and four California cities filed a petition for EPA to reconsider SAFE-1. A petition for recosideration was also filed by several enviromental groups. On April 28, 2021, USEPA published a Notice of Reconsideration: California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment. The public comment period closed July 6, 2021 (USEPA 2021b). On March 25, 2022, after reviewing all the public comments, NHTSA finalized the CAFE Preemption rulemaking to withdraw its portions of the so-called SAFE I Rule (NHTSA 2022).

On March 31, 2022, NHTSA finalized CAFE standards that require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, the strongest cost savings and fuel efficiency standards to date. The new standards will increase fuel efficiency percent annually for model years 2024-2025 and 10 percent annually for model year 2026. They will also increase the estimated fleetwide average by nearly 10 miles per gallon for model year 2026, relative to model year 2021 (NHTSA 2022).

State

Assembly Bill 1493 (Mobile Source Reductions)

Assembly Bill (AB) 1493, adopted September 2002, also known as Pavley I, requires the development and adoption of regulations to achieve the maximum feasible reduction of GHGs emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. The emission standards have become increasingly more stringent through the 2016 model year. California is also committed to further strengthening these standards beginning in 2017 to obtain a 45 percent GHG reduction from 2020 model year vehicles (CARB 2021c). Regulations to make California emissions standards for model year 2017 and beyond consistent with federal standards were adopted in 2012 and are discussed further below.

CARB's Advanced Clean Cars Program

In January 2012, the California Air Resources Board (CARB) approved the Advanced Clean Cars Program, an emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles (ZEVs) each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles. In March 2017, CARB adopted GHG standards for 2022 through 2025 model years and directed staff fo begin rule development for 2026 and subsequent model years. In November 2022, CARB adopted Advanced Clean Cars II regulations, which impose the next level of low-emission and zero-emission vehicle standards for 2026 through 2035 model years. These require that by 2035, all new passenger cars, trucks, and SUVs sold in California are zero emissions (CARB 2023).

Executive Order S-3-05 (Statewide GHG Targets)

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

However, executive orders do not have the same status as a law because in California's constitutional system, it is the Legislature, not the Governor, who is entrusted with the role of making statewide laws. The Legislature declined to include the Executive Order's 2050 goal in AB 32 (discussed below), and again declined to use the EO's 2050 goal in adopting Senate Bill (SB) 375 (discussed below), nor has it incorporated it in any implementing legislation or applicable plans. Additionally, although CARB has the requisite authority to adopt whatever regulations are necessary beyond the AB 32 horizon year 2020 to meet the target set forth in S-3-05, the agency

has not done so. Since the Legislature has never enacted EO S-3-05's 2050 target, and no expert agency has interpreted CEQA to require it, the 2050 target has only the force and effect of an executive order issued by a former Governor. If the Legislature has delegated any of its authority to define CEQA's requirements, it delegated that authority to the Governor's Office of Planning and Research (OPR).

Senate Bill 97 and the State CEQA Guidelines

Pursuant to Senate Bill (SB 97), OPR developed proposed amendments to the State CEQA Guidelines (CEQA Amendments) for the feasible mitigation of GHG emissions and their effects, which it first submitted to the Secretary of the CNRA on April 13, 2009. After a public review and comment period, on December 30, 2009, the CNRA adopted the CEQA Amendments, which became effective on March 18, 2010.

The CEQA Amendments for Greenhouse Gas Emissions state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Amendments note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance based standards" (CNRA 2009b). Section 15064.4(b) of the State CEQA Guidelines provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment (CNRA 2009b):

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

All of these are considered in the impact analysis presented in this section. In addition, the revisions to Appendix G, Environmental Checklist Form, of the State CEQA Guidelines, which is often used as a basis for lead agencies' selection of significance thresholds, does not prescribe specific thresholds. Rather, Appendix G asks whether the project would conflict with a plan, policy or regulation adopted to reduce GHG emissions or would generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency. Accordingly, the CEQA Amendments do not prescribe specific methodologies for performing an assessment; they do not establish specific thresholds of significance; and they do not mandate specific mitigation measures. Rather, the CEQA Amendments emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009b).

The CEQA Amendments indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to the Project, these potential mitigation measures, set forth in Section 15126.4(c) of the State CEQA Guidelines, may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency's decision; (2) reductions in GHG emissions resulting from

a project through implementation of project design features; (3) off-site measures, including offsets, to mitigate a project's emissions; and (4) carbon sequestration measures (CNRA 2009b).

Among other things, the CNRA noted in its Public Notice for these changes that impacts of GHG emissions should focus on the cumulative impact on climate change. The Public Notice states (CNRA 2009):

> While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CNRA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable.

Thus, the CEQA Amendments continue to make clear that the significance of greenhouse gas emissions is most appropriately considered on a cumulative level.

Assembly Bill 32 (Statewide GHG Reductions)

In furtherance of the goals established in EO S-3-05, the California Legislature adopted the public policy position that global warming is "a serious threat to the economic well-being, public health, natural resources, and the environment of California" (*California Health and Safety Code*, Section 38501). The public policy statements became law with the enactment of the California Global Warming Solutions Act of 2006 (AB 32) in September 2006, after considerable study and expert testimony before the Legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. AB 32 directed CARB to set a GHG emission limit based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The scoping plan is described further below.

Executive Order B-30-15 (Statewide Interim GHG Targets)

California EO B-30-15 (2015) set an "interim" statewide emission target to reduce GHG emissions to 40 percent below 1990 levels by 2030, and directed State agencies with jurisdiction over GHG emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels. Specifically, the Executive Order directed CARB to update the Scoping Plan to express this 2030 target in metric tons.

Senate Bill 32/Assembly Bill 197

SB 32, signed September 8, 2016, implements a goal of EO B-30-15. Under SB 32, in "adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions," CARB must ensure that statewide greenhouse gas emissions are reduced to 40 percent below the 1990 level by 2030. SB 32's findings state that CARB will "achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature." AB 197, a companion to SB 32, adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions.

California Air Resources Board Scoping Plan

On December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emission level would require a reduction of GHG emissions of approximately 28.5 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business as usual"). The Scoping Plan evaluates opportunities for sector-specific reductions; integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities; identifies additional measures to be pursued as regulations; and outlines the role of a cap-and-trade program.

First Update to the Climate Change Scoping Plan

CARB approved the final "First Update to the Climate Change Scoping Plan" on May 22, 2014. The first update describes California's progress towards AB 32 goals, stating that "California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32". Specifically, "if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050" (CARB 2014). Reducing the "business as usual" or NAT condition of 509 $MMTCO_2e$ to the 1990 emissions level of 431 $MMTCO_2e$ will require a reduction of 78 $MMTCO_2e$, or approximately a 15.3 percent reduction (compared to a 28.5 percent reduction as set forth in the original Scoping Plan but not directly comparable because of the change in methodology).

Second Update to the Climate Change Scoping Plan

CARB prepared a second update to the Scoping Plan to reflect the 2030 target established in Executive Order B-30-15 and in Senate Bill 32 (discussed above). The Final Proposed 2017 Scoping Plan was published in November 2017, and the third public Board Meeting for the Proposed Scoping Plan was held on December 14, 2017, where the Final Proposed 2017 Climate Change Scoping Plan (Second Update to the Climate Change Scoping Plan, or 2017 Scoping Plan Update) was adopted.

The 2017 Scoping Plan Update includes new statutory GHG reduction requirements that were not included in the current Scoping Plan, including Senate Bill 32 (discussed below) which sets a 40 percent GHG reduction target below 1990 GHG levels to be achieved by 2030, SB 350 (which sets a 50 percent reduction in GHG emissions from electricity generation and other energy uses in existing structures, and a 50 percent renewable energy portfolio requirement), and SB 650 (which establishes priority GHG reduction targets for designated types of greenhouse gases such as methane). The key elements of the 2017 Scoping Plan Update proposal call for further GHG reductions from the refinery sector specifically, further reductions from other stationary sources through either a renewed and expanded cap-and-trade or carbon tax program, further reductions from other sectors such as transportation technologies and services, water and solid waste conservation and management, and land uses in both open space and urban areas (CARB 2017).

2022 Scoping Plan Update

The 2022 Scoping Plan assesses progress towards achieving carbon neutrality by 2045 or earlier through the reduction of emissions by 85 percent below 1990 levels. The Scoping Plan takes an aggressive approach to decreasing fossil fuel use and decarbonization of every sector of emissions. Measures include moving to zero-emission transportation, phasing out the use of fossil fuel gas used for heating, reduction in the use of chemicals and refrigerants with high global warming potential, development of sustainable infrastructure that provides opportunities for walking, biking and public transit to reduce reliance on automobiles, and development of renewable energy (CARB 2022).

Senate Bill 375 (Land Use Planning)

Signed September 30, 2008, SB 375 provides for a new planning process to coordinate land use planning and regional transportation plans (RTPs) and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations, including the Southern California Association of Governments (SCAG), to incorporate a Sustainable Communities Strategy (SCS) in their regional transportation plans that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing vehicle miles traveled (VMT) and encouraging more compact, complete, and efficient communities for the future. SB 375 also includes provisions for exemptions from or streamlined CEQA review for projects classified as transit priority projects. See additional discussion of the SCAG plan under “Regional” regulations below.

Senate Bill 743

Signed in 2013 and implemented beginning in 2018, SB 743, updated the way transportation impacts are analyzed Under CEQA. Specifically, the State CEQA Guidelines were amended so that the amount of driving and length of trips – measured by vehicle miles traveled (VMT) – is used to assess transportation impacts instead of road congestion – commonly measured by level of service (LOS). SB 743 required that the alternative criteria to LOS, which developed into the VMT approach, promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. This way of measuring transportation is supportive of projects that reduce VMT thereby supporting Statewide policies that (a) combat climate change by reducing GHG emissions; (b) encourage infill development and a diversity of rather than greenfield development; and (c) promote multi-modal transportation networks, providing clean, efficient access to destinations and improving public health through active transportation.

Senate Bills 1078, 107, and SBX1-2 (Renewable Portfolio Standards)

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, and again in 2011 under SBX1-2, California’s Renewable Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. Initially, the Renewable Portfolio Standard (RPS) provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS.

Senate Bill 350

SB 350, signed October 7, 2015, is the *Clean Energy and Pollution Reduction Act of 2015*. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are:

(1) To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.

(2) To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation (CEC 2021a).

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045. This policy requires the transition to zero-carbon electric systems that do not cause contributions to increase of GHG emissions elsewhere in the western electricity grid (CEC 2021b). SB 100 also creates new standards for the RPS goals established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor-owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030.

Executive Order B-55-18

On September 10, 2018, Governor Brown also signed California EO B-55-18, which sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045, and achieve net negative emissions thereafter. EO B-55-18 was added to the existing Statewide targets of reducing GHG emissions, including the targets previously established by Governor Brown of reducing emissions to 40 percent below 1990 levels by 2030 (EO B-30-15 and SB 32), and by Governor Schwarzenegger of reducing emissions to 80 percent below 1990 levels by 2040 (EO S-3-05).

Title 24 Energy Efficiency Standards

The Energy Efficiency Standards for Residential and Non-residential Buildings (24 CCR, Part 11) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The currently applicable standards are the 2022 Standards, effective January 1, 2023 (CBSC 2022). The 2022 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources (CEC 2021c). The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas and electricity use produce GHG emissions. The goal of the standards is to reduce energy use in new homes by more than 50 percent. The 2019 standards require that there is sufficient on-site electricity generation to meet the annual electricity usage for low rise residential buildings. A 30 percent reduction in energy uses is anticipated for nonresidential uses. The requirement for low-rise residential buildings to develop on-site electricity generation is consistent with the goal to develop renewable sources of energy.

California Green Building Standards Code

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California) (CBSC 2022). The development of the CALGreen Code is intended to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the following construction practices: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

California Air Pollution Control Officers Association

The California Air Pollution Control Officers Association (CAPCOA) is the association of Air Pollution Control Officers representing all 35 local air quality agencies throughout California. CAPCOA is not a regulatory body, but has been an active organization in providing guidance in addressing the CEQA significance of GHG emissions and climate change as well as other air quality issues. The August 2010 CAPCOA publication entitled Quantifying Greenhouse Gas Mitigation Measures, A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures provides guidance on the quantification of project-level mitigation of GHGs associated with land use, transportation, energy use, and other related project areas. The guidance includes detailed procedures about the approaches to assessing and calculating the GHG emissions reductions associated with project design features and mitigation measures (CAPCOA 2010). This publication's methods are used in the CalEEMod computer model that is used to calculate GHG emissions.

Regional

South Coast Air Quality Management District

The City lies within the boundaries of the SCAQMD. SCAQMD is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside and San Bernardino counties, including the Coachella Valley. The region is home to more than 17 million people–about half the population of the entire state of California. The mission of the SCAQMD is "To clean the air and protect the health of all residents in the South Coast Air District through practical and innovative strategies (SCAQMD 2021).

Beginning in April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of 10,000 metric tons of CO2 equivalent per year (MTCO2e/year) for industrial projects where the SCAQMD is the lead agency. The policy objective for establishing this significance threshold is to capture projects that represent approximately 90 percent of GHG emissions from new sources and to avoid EIR-level analysis for relatively small impacts (SCAQMD 2008).

In September 2010, the Working Group proposed extending the 10,000 MTCO2e/year screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. For all other projects, SCAQMD staff proposed a multiple tier analysis to determine the appropriate threshold to be used. The draft

proposal suggests the following tiers: Tier 1 is any applicable CEQA exemptions, Tier 2 is consistency with a GHG reduction plan, Tier 3 is a screening value or bright-line[2], Tier 4 is a performance-based standard, and Tier 5 is GHG mitigation offsets. According to the presentation given at the September 28, 2010, Working Group meeting, SCAQMD staff proposed a Tier 3 draft threshold of of 3,000 MTCO2e per year for all non-industrial land use types (SCAQMD 2010). For the Tier 4 draft threshold, SCAQMD staff presented a percent emission reduction target option but did not provide any specific recommendation for a numerical target; instead it referenced the San Joaquin Valley Air Pollution Control District (SJVAPCD) approach. The percent reduction target is based on consistency with AB 32 as it was based on the same numeric reductions calculated in the Scoping Plan to reach 1990 levels by 2020. The second Tier 4 option is to utilize efficiency targets: 2020 targets are 4.8 MTCO2e per year per service population (SP) for project-level thresholds where SP is project residents plus employees and 6.6 MTCO2e per year per SP for a plan-level threshold (SCAQMD 2010). Targets for 2035 are 3.0 MTCO2e per SP for project level thresholds and 4.1 MTCO2e per year per SP for plan level threshold. The Working Group has not convened since the fall of 2010. As of the publication of this PEIR, the proposal to establish a GHG threshold for developments like the Project (e.g., general plans, housing elements) has not been considered or approved for use by the SCAQMD Board.

Southern California Association of Governments

As previously discussed, SB 375 specifically required Metropolitan Planning Organizations (MPOs), including SCAG, to incorporate a Sustainable Communities Strategy (SCS) in their Regional Transportation Plan (RTPs) that will achieve GHG emission reduction targets set by CARB. SCAG's current SCS is included in its 2020–2045 RTP/SCS *Connect SoCal* (SCAG 2020).[3] The 2020 RTP/SCS combines the need for mobility with a "sustainable future" through a reduction in the amount of emissions produced from transportation sources. The 2020 RTP/SCS includes population, housing, and employment forecasts for the City. The document was adopted by SCAG on September 3, 2020. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035 relative to 2005.

Local

South Pasadena Climate Action Plan

The City of South Pasadena adopted its first Climate Action Plan (CAP) on December 16, 2020. The CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. The CAP analyzes emission sources within the City, forecasts future emissions, and establishes emission reduction targets. This CAP is the City of South Pasadena's roadmap to achieving the City's target and state mandated goal of 40 percent below 1990 levels by 2030, with the ultimate goal of achieving carbon neutrality by 2045. The CAP also establishes a framework for implementation and monitoring of reduction activities, and further promotes adaptation and preparedness actions. The plan is intended to be a qualified GHG Reduction Plan and meets the requirements of Section 15183.5(b) of the State CEQA Guidelines (South Pasadena 2020). The CAP states, "In the City of South Pasadena, the most pronounced effects of climate change will be increased average temperature, more days of extreme heat, and elevated drought risk, all of which may lead to increased wildfires."

[2] A bright-line is a single value, applicable to all projects of one type, regardless of size. Thus, a bright-line is different from performance standards or efficiency standards that are generally based on a per-unit basis.

[3] The 2020-2045 RTP/SCS succeeds the 2016-2040 RTP/SCS.

The CAP targets are to reduce the City's GHG emissions from a level of approximately 125,269 $MTCO_2e$/year in 2016, when the CAP was prepared, to approximately 75,000 $MTCO_2e$/year in 2030, 25,000 $MTCO_2e$/year in 2040, and zero in 2045. CAP emission reduction measures and actions are called Plays and Moves, respectively, in the CAP. The GHG emission reduction measures (Plays) are summarized in Table 3.7-2.

TABLE 3.7-2
SOUTH PASADENA CLIMATE ACTION PLAN
MEASURES (PLAYS) SUMMARY

Sector	Play		GHG Emissions Reduction Contribution
Cornerstone	C.1	Engage South Pasadena youth in climate action and provide education on ways to live a sustainable lifestyle.	2030: 25 MT CO_2e 2045: 78 MT CO_2e
Energy	E.1	Maximize the usage of renewable power within the community, by continuing to achieve an opt-out rate lower than 4% for the Clean Power Alliance.	2030: 13,408 MT CO_2e 2045: 0 MT CO_2e
	E.2	Electrify 100% of newly constructed buildings.	2030: 228 MT CO_2e 2045: 935 MT CO_2e
	E.3	Electrify 5% of existing buildings by 2030 and 80% by 2045.	2030: 1,184 MT CO_2e 2045: 19,355 MT CO_2e
	E.4	Develop and promote reduced reliance on natural gas through increased clean energy systems that build off of renewable energy development, production, and storage.	Supportive of 2030 and 2045 Goals
Transportation	T.1	Increase zero-emission vehicle and equipment adoption to 13% by 2030 and 25% by 2045.	2030: 3,774 MT CO_2e 2045: 6,629 MT CO_2e
	T.2	Implement programs for public and shared transit that decrease passenger car vehicle miles traveled 2% by 2030 and 4% by 2045.	2030: 807 MT CO_2e 2045: 1,399 MT CO_2e
	T.3	Develop and implement an Active Transportation Plan to shift 3% of passenger car vehicle miles traveled to active transportation by 2030, and 6% by 2045.	2030: 1,186 MT CO_2e 2045: 2,015 MT CO_2e
Water and Wastewater[1]	W.1	Reduce per capita water consumption by 10% by 2030 and 35% by 2045.	2030: 414 MT CO_2e 2045: 0 MT CO_2e
Solid Waste	SW.1	Implement and enforce SB 1383 organics and recycling requirements to reduce landfilled organics waste emissions 50% by 2022 and 75% by 2025.	2030: 1,702 MT CO_2e 2045: 1,764 MT CO_2e
	SW.2	Reduce residential and commercial waste sent to landfills by 50% by 2030 and 100% by 2045.	2030: 415 MT CO_2e 2045: 859 MT CO_2e
Carbon Sequestration	CS.1	Increase carbon sequestration through increased tree planting and green space.	2030: 19 MT CO_2e 2045: 39 MT CO_2e
Municipal	M.1	Reduce carbon intensity of City operations.	2030: 188 MT CO_2e 2045: 188 MT CO_2e
	M.2	Electrify the municipal vehicle fleet and mobile equipment.	2030: 23 MT CO_2e 2045: 23 MT CO_2e
	M.3	Increase City's renewable energy production and energy resilience.	Supportive of 2030 and 2045 Goals
		Totals	**2030: 22,959 MT CO_2e** **2045: 33,284 MT CO_2e**

"Note: South Pasadena would be required to reduce 18,578 MT CO_2e by 2030, 53,874 MT CO_2e by 2040, and 73,969 MT CO_2e by 2045 to meet the City's targets and state goals.

[1] There is risk of double counting emission reductions from Play W.1 with Play E.1. Play W.1 emission reductions totals are provided for informational purposes but are not added to the emission reduction totals."

Source: South Pasadena 2020

Gas-Powered Leaf Blower Ban

On September 1, 2020, the City Council passed an ordinance phasing out the use of gas-powered leaf blowers Citywide. There is a phase-in period for the gas-powered leaf blower ban, and the ordinance prohibits any person in the City from using a gas-powered leaf blower after October 1, 2022. As part of the Council consideration of the ban, the City allocated funding to engage in an outreach program to ensure the public is aware of the obligations that they and their landscaping contractors face regarding gas-powered equipment. The ordinance also addresses restrictions on noise pollution and amended the fine structure for violations of the code, which includes anyone who authorizes the use of gas-powered leaf blowers, which was effective in Fall 2021.

3.7.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse greenhouse gas emissions impact if it would:

Threshold 3.7a: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or

Threshold 3.7b: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Like most municipalities, the City of South Pasadena has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. Two suggested thresholds will be examined: bright-line and efficiency.

As discussed above, the SCAQMD recommended a 3,000 MTCO2e/yr threshold for all non-industrial projects. This threshold has been and continues to be used in CEQA project analysis. The threshold as a “bright-line” is not appropriate for use at the plan level but will be examined as guidance.

An efficiency screening threshold of 1.3 $MTCO_2e$ per service population (SP) per year is also used as guidance to a potential significant impact. The efficiency threshold for the Project’s buildout year of 2040 was calculated using linear interpolation between the 2020 target of 6.6 MTCO2e/SP/yr and the 2045 target of 0 MTCO2e/SP/yr. The 2045 target is an 80 percent reduction in the 2020 target, consistent with the requirement of Executive Order B-55-18 to achieve carbon neutrality by 2045. The service population is the sum of residents and employees. This approach was a widely accepted screening threshold used by numerous cities in the SoCAB; however, its use to determine significant impact has been invalidated in court cases.

3.7.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.2 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

A1.2a Continue to channel Federal, State and Local transportation funds to programs, and infrastructure improvements that reduce air pollution through the promotion of walking, biking, ride-sharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies.

P1.3 Promote the use of energy-efficient vehicles.

A1.3a Continue to control and reduce air pollution emissions from vehicles owned by the City by expanding the use of alternative fuel, electric, and hybrid vehicles in City fleets.

A1.3b Promote, encourage and facilitate the installation of alternative fueling stations and electrical charging stations at businesses and residences.

P1.4 Minimize the adverse impacts of growth and development on air quality and climate.

A1.4a Implement policies and actions of the Climate Action plan, adopted on December 16, 2020.

A1.4b Minimize the use of asphalt within the City and mitigate the sources of urban heat island impacts.

P1.6 Preserve, manage, and grow the tree canopy.

A1.6 Adopt an Urban Forest Management Plan.

P3.12 Ensure continuity of critical services and ensure that adequate infrastructure is provided to accommodate new development by identifying capital improvements necessary to support long-term needs and responsibilities for funding and implementing improvements.

A3.2a Create a long-term plan to update infrastructure not only to accommodate growth, but also the effects of climate change.

P3.13 Implement energy efficient retrofit improvements in existing buildings consistent with the requirements of the City's Climate Action Plan.

A3.13 Support programs to provide loans to property owners for the installation of energy efficiency improvements or renewable energy devices.

P3.14 Establish standards for the inclusion of energy efficient design and renewable technologies in all new public and private projects.

A3.14a Require all new buildings or major retrofits to be pre-wired for solar panels. Encourage battery back-up systems or generators in key locations throughout the city.

A3.14b Establish clean energy "micro-grids".

A3.14c Adopt zero net energy building codes.

A3.14d Provide builders, businesses, and residents with resources and information about energy efficiency and renewable energy technologies at the Building Permit counters and on the City's website.

A3.14e Develop a Solar Action Plan to meet 50% of South Pasadena's power demand through solar by 2040 and consider implementing recommendations of "Clean Energy Pathway for South Pasadena" and "Solar in South Pasadena: First Steps."

A3.14f Electrify South Pasadena's Vehicles. Develop a city fleet alternative fuel conversion policy, and use it to promote residents to convert as well.

A3.14g Install Electric Vehicle (EV) chargers at public facilities. Encourage property owners to install EV chargers at business and multi-family locations.

P4.1 Provide safe, comfortable and convenient access to local destinations for people walking and bicycling in South Pasadena and integrate the local walking and bicycling network into the regional network to connect to adjacent jurisdictions and points beyond.

A4.1a Upgrade and enhance existing walking and bicycling facilities to support safety, comfort, and convenience, especially in Pedestrian Priority Areas and along Bicycle Priority Corridors.

A4.1b Enhance active transportation connections to and from the Metro A Line station.

A4.1c Ensure that walking facilities – including sidewalks, curb ramps, crossings, and trails – are accessible for people with physical impairments.

A4.1d Develop a signage master plan consistent with state regulations that specifies guidelines and requirements for the design of high-quality, user-friendly and attractive human-scaled signage directing people driving, walking, and bicycling to destinations and guiding them through the bicycle/pedestrian network.

A4.1e Encourage and/or require the provision of secure bicycle parking facilities at employment centers, commercial centers, recreational amenities, and civic amenities.

P4.2 Engage and educate the community to encourage people to walk and bike in South Pasadena for recreation, transportation, and health/fitness. Promote walking and biking as safe, enjoyable, convenient, and environmentally sustainable alternatives to automobile travel.

A4.2a Support bicycle and pedestrian safety education classes and programs in order to improve safety for all road users.

A4.2b Support programs that encourage South Pasadena residents, workers, and visitors to choose walking, bicycling, and other active modes of travel.

P4.3 Promote safety for all road users through compliance with – and enforcement of – traffic codes for drivers, bicyclists and pedestrians.

A4.3 Work with the South Pasadena Police Department to increase enforcement of traffic laws related to walking and bicycling.

P4.4 Ensure successful implementation of the active transportation policies and actions by developing programs and strategies for successfully implementing and funding pedestrian and bicycle projects and programs, and for maintaining pedestrian and bicycle facilities.

A4.4a Provide routine inspection and maintenance of pedestrian and bicycle facilities, including pavement repairs, restriping, maintenance of traffic control devices, landscape maintenance, and sweeping bike lanes and paths.

A4.4b Minimize disruption to pedestrians when repairing and constructing transportation facilities, and provide alternate routes when necessary.

A4.4c Evaluate the progress and effectiveness of the Active Transportation policies and actions to achieve project and program goals.

A4.4d Regularly seek funding for the design and development of active transportation projects, and ensure awareness of current regional, state, and federal funding programs.

A4.4e Coordinate with federal, state, regional, county and local agencies to fund and implement bicycle and pedestrian projects in cooperation with other nearby jurisdictions.

P4.5 Support street designs that emphasize safety and accommodate all users, including pedestrians and cyclists.

A4.5c Proceed with modifications to the "bulb-out" curb extensions on Fair Oaks. If some bulb-outs are removed as part of this process, implement alternative measures to protect pedestrians in the corridor including leading pedestrian intervals and enhanced crosswalks.

A4.5d Identify and improve the safety and efficiency of crosswalks throughout the City, consistent with the requirements of State legislation including the Americans with Disabilities Act (such as Monterey Road and Pasadena Avenue).

P4.6 Provide high-quality pedestrian and bicycle facilities to enhance the safety, comfort and convenience of people walking and bicycling in South Pasadena.

A4.6a Implement South Pasadena's Complete Streets Policy.

A4.6b Design roadways to safely accommodate all users, balancing the needs of people walking, bicycling, riding transit, and driving personal and commercial vehicles.

A4.6c Utilize roadway design/engineering best practices to ensure safe and effective pedestrian and bicycle infrastructure.

A4.6d Utilize best practices for the design of bicycle parking facilities in the public realm and at locations such as employment centers and schools.

P4.7 On streets identified as priorities for one specific mode of travel, such as bicycle routes, prioritize improvements for that mode. Ensure that bicycle lanes provide a high level of separation from traffic, using buffers, vertical elements or parked cars wherever possible.

A4.7a Proceed with implementation of Bicycle Master Plan projects.

A4.7b Update the Bicycle Master Plan to identify the appropriate locations and improvements for a citywide network of bicycle paths and facilities.

A4.7c Study the viability of adding bicycle lanes to Fair Oaks Avenue and Mission Street.

P4.8 Maintain a roadway system that provides for the efficient movement of goods and people in South Pasadena, while maintaining the community's character and quality of life.

A4.8b Require that development projects achieve no net increase in Vehicle Miles Traveled (VMT) per capita above current levels for comparable uses in the City of South Pasadena as determined in accordance with the City's Transportation Impact Analysis (TIA) Methodology (updated May 5, 2020).

P4.10 Explore options to improve transit service within South Pasadena, including City programs and/or partnerships with Metro.

A4.10 Improve transit service within South Pasadena using one of four options:

1. Expand the City's existing dial-a-ride program to serve all residents (and not just older residents);
2. Implement a citywide circulator shuttle, funded through a public-private partnership, providing connections every 30 minutes or more often during the day to the Metro A Line station and other major destinations;
3. Partner with Pasadena to expand Pasadena Transit service to South Pasadena;

4. Initiate a partnership with Metro to pilot "microtransit" on-demand service using smartphone apps.

P4.11 Facilitate safe and improved pedestrian and bicycle traffic between the Metro L Line station and major destinations.

A4.11a Study and develop a plan for sidewalk, signalization, crosswalk, bike ways, and other improvements on streets connecting the Metro L Line station with the downtown and surrounding neighborhoods (for example Mission Street at Prospect Avenue, El Centro Street between Mound and Edison Avenues, and Orange Grove Avenue at El Centro Street).

A4.11b Explore appropriate ways to improve the safety of pedestrians and cyclists at rail crossings.

P4.12 Encourage and facilitate shared-ride options include e-hailing services, carshare, and bikeshare. Increase awareness of multimodal alternatives to driving to the Metro A Line station.

A4.12 In the near term, work with Metro and private partners (carshare companies) to identify "mobility hub" improvements that could be implemented at or near the Metro A Line station, such as additional, secure parking (lockers) for bicycles, a future bikeshare station and carshare vehicles stationed in the Mission Meridian Village Parking Garage.

P6.2 Roadway designs should prioritize safety and promote safe complete street networks that facilitate safe and comfortable walking and biking.

P6.2a Create safe and well-connected street networks for walking and biking to improve access to destinations, school zones, and other community services.

A6.2b Provide infrastructure to support safe biking.

A6.2c Teach children safe walking and biking behaviors. Implement organized walk to school days, walking school buses, and other similar events.

A6.2d Expand multi-modal mobility choices residents need to remain independent as they age.

P6.6 Reduce the prevalence of unpleasant noise and smell.

A6.6b Provide educational materials and programs that inform the public about noise and pollution risks of gas-powered outdoor maintenance and encourage use of alternative environmentally sensitive solutions.

A6.6c Enforce ordinance prohibiting use of gas-powered leaf blowers.

P7.7 Identify the risks that climate change poses to South Pasadena, in accordance with SB 379.

A7.7 Incorporate by reference the current Los Angeles County Vulnerability Assessment.

Downtown Specific Plan Update

P1.1 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

P1.3 Preserve, manage, and grow the downtown tree canopy.

P3.4 Encourage green projects and practices and support the inclusion of energy efficient design and renewable technologies in all new downtown public and private projects.

A3.4a Require new and/or renovated buildings to meet USGBC LEED Silver rating or equivalent and advance the City's sustainability goals.

A3.4b Incentivize sustainable living and business practices, both passive and active, that encourage energy efficiency, improve indoor air quality, and encourage water and resource conservation.

A3.4c Support solar panels on all new buildings.

A3.4d Explore opportunity to develop clean energy micro-grids.

A3.4e Install Electric Vehicle (EV) chargers at public facilities in the Downtown area. Encourage property owners to install EV chargers at Downtown business and multifamily locations.

P4.1 Support street designs that emphasize safety and that accommodate all users, including pedestrians and cyclists.

A4.1a Ensure that streets are pedestrian-oriented, with complete sidewalks, regular crosswalks, and other measures to improve pedestrian safety and comfort such as compact corner radii, "bulb-out" sidewalk extensions at crosswalks, leading pedestrian intervals at signals, additional safety measures potentially including pedestrian-actuated signals at unsignalized crosswalks, other traffic calming measures, and increased investments in sidewalk maintenance and lighting.

P4.2 On streets identified as priorities for one mode of travel, such as bicycle routes, prioritize improvements for that mode.

A4.2a Ensure that bicycle facilities provide a high level of separation from traffic, using buffers, vertical elements or parked cars wherever possible; and consider speed limit adjustments pursuant to Assembly Bill 43.

A4.2b Proceed with implementation of Bicycle Master Plan projects.

P4.3 Reduce traffic congestion by reconfiguring outmoded interchanges and traffic signals rather than adding lanes to streets.

A4.3a Synchronize traffic signals wherever possible to optimize traffic flow at safe speeds.

A4.3b Work with Metro and the California Public Utilities Commission to reduce signal delay at the A Line crossing of Mission Street and Meridian Avenue while maintaining safety.

P4.4 Explore options to improve transit service within South Pasadena, including City programs, public/private partnerships, and/or partnerships with Metro.

A4.4a Maintain the City's existing Dial-A-Ride program.

A4.4b Initiate a partnership with Metro to pilot microtransit on-demand service using smartphone apps.

P4.5 Seek resiliency in transportation investments.

A4.5b Develop a well-connected multi-modal transportation network that provides multiple options to access Downtown destinations.

A4.5c Support development of diverse and competing transportation services, such as ride-sharing, delivery services, and use of telecommunications to substitute for physical travel.

P4.6 Identify important pathways for pedestrian and bicycle travel between the Metro A Line station and major destinations, and make improvements to safety and comfort along these paths.

A4.6a Add an unsignalized crosswalk, with accompanying safety measures, on Mission Street at Prospect Avenue.

A4.6b Add a sidewalk on the north side of El Centro Street between Mound and Edison Avenues.

A4.6c Reconfigure the intersection of Orange Grove Avenue and El Centro Street to require slower right turns by vehicles from southbound Orange Grove Avenue onto westbound El Centro Street.

A4.6d Over the longer term, work with Metro to explore options for grade-separation of existing Metro A Line at-grade crossings including Monterey Road/Pasadena Avenue.

P4.7 Encourage and facilitate shared-ride options include e-hailing services, carshare and bikeshare.

A4.7a In the near term, work with Metro and private partners (carshare companies) to identify "mobility hub" improvements that could be implemented at or near the station, such as additional, secure parking (lockers) for bicycles, a future bikeshare station and carshare vehicles stationed in the Mission Street/Meridian Avenue garage.

P6.2 Lead with roadway design that prioritizes safety. Promote safe networks of complete streets that facilitate safe and comfortable walking and biking.

A6.2a Repurpose Mission Street and Fair Oaks Avenue to include safe and well-connected street networks for walking and biking, and to improve access to destinations and other community services.

A6.2c Augment pedestrian activity and social interaction along Mission Street; provide more sidewalk space, and provide a series of parklets distributed throughout the street.

A6.2d For blocks over 400 feet long on Mission Street, provide mid-block crossings that encourage pedestrian activity along and across the street.

A6.2e Pave and enhance Pico Alley with string lights, east of the Metro A Line station, so it becomes a gathering space as well as an important pedestrian connection from the station to the eastern blocks, without as an alternative to Mission Street.

A6.2f Pave and enhance with trees and string lights Edison Alley, behind the Rialto, so it becomes a distinct north-south pedestrian connection, connecting the Rialto to Mission Street.

P6.3 Increase infrastructure that supports biking.

A6.3a Encourage existing and new development to provide secure indoor bicycle parking in the form of indoor racks or storage rooms to ensure security and weather protection, and provide outdoor bike racks.

P7.1 Make Downtown streets safe for pedestrians and bicyclists.

A7.1a Carry out the safety enhancements recommended by the Downtown Vision for Mission Street and Fair Oaks Avenue.

A7.1b Add mid-block crossings and parklets on Mission Street.

A7.1c Amend the development codes to allow context sensitive street types.

P8.3 Promote a new, balanced traffic culture including walking and cycling for all age groups.

A8.3a Support and develop existing publicly-owned right-of-ways and streets into temporary and permanent open spaces like parklet, curb extension, mid-block crossing, sidewalk extension, shared street, and temporary open street or street park.

A8.3b Transform Mission Street and Fair Oaks Avenue into complete streets that promote safe walking and cycling.

2021–2029 Housing Element

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

3.7.6 ENVIRONMENTAL IMPACTS

Threshold 3.7a: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction

As the General Plan and DTSP Update & 2021–2029 Housing Element identify future land uses and do not contain specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Therefore, such impacts are too speculative to evaluate, consistent with Section 15145 of the State CEQA Guidelines. To the extent that specific projects are known, those projects have already been or would be subjected to their own environmental analysis. Therefore, GHG emissions related to Project construction are assumed to be a significant and unavoidable impact.

Operation

Operational emissions associated with buildout of the proposed development pursuant to the General Plan Update & 2021–2029 Housing Element have been quantified. Operational activities associated with buildout of the Project would result in emissions of GHGs from the sources discussed below.

Area Source Emissions

Hearths/Fireplaces

The Project is required to comply with SCAQMD Rule 445, which prohibits the use of wood burning stoves and fireplaces in new development. In order to account for the requirements of this Rule, the unmitigated CalEEMod model estimates were adjusted to assume that natural gas fireplaces would be provided in single-family homes and accessory dwelling units (ADU).

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the

landscaping of the Project. CalEEMod default parameters were used to estimate emissions associated with landscape maintenance equipment for the Project scenario.

Energy Source Emissions

GHGs are emitted from buildings as a result of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are considered to be indirect emissions. CalEEMod default parameters were used to estimate electricity and natural gas demand for the Project scenario. The GHG intensity, i.e., the GHG emissions per amount of electricity used, was calculated from Southern California Edison data and goals.

Mobile Source Emissions (Vehicles)

GHG emissions will also result from mobile sources associated with the Project. These mobile source emissions will result from the typical daily operation of motor vehicles by visitors and residents. A project's mobile source emissions impacts are dependent on both daily vehicle trip generation and the vehicle miles travelled (VMT). These data were obtained from calculations provided by the Project's traffic consultant, Iteris, Inc. (Iteris). Refer to Section 3.14, Transportation, of this Draft PEIR for a discussion of the existing and projected VMT with implementation of the Project.

Solid Waste

Residential and commercial land uses will result in the generation and disposal of solid waste. A large percentage of this waste will be diverted from landfills by a variety of means, such as reducing the amount of waste generated, recycling, and/or composting. The remainder of the waste not diverted will be disposed of at a landfill. GHG emissions from landfills are associated with the anaerobic breakdown of material. CalEEmod default parameters were used to estimate GHG emissions associated with the disposal of solid waste for the Project scenario.

Water Usage

Indirect GHG emissions result from the production of electricity used to convey, treat and distribute water and wastewater. The amount of electricity required to convey, treat and distribute water depends on the volume of water as well as the sources of the water. CalEEMod default parameters were used to estimate GHG emissions associated with water supply, treatment and distribution for the Project scenario.

Stationary Source Emissions

Operational emissions may occur from fossil-fueled emergency generators and fire pumps. As it is not known how many of these sources may be installed as part of the General Plan and DTSP Update & 2021-2029 Housing Element, these emissions are not estimated in this analysis.

Estimated Emissions

Table 3.7-3, Annual Greenhouse Gas Emissions Summary, presents the estimated GHG emissions associated with the operational activities of the proposed growth pursuant to the General Plan and DTSP Update as modeled for purposes of the transportation analysis (i.e., 246

single-family dwelling units (DUs), 2,232 multi-family DUs, 297 ADUs, 130,000 square feet of retail, and 430,000 square feet of commercial). It is noted that this is not meant to reflect the precise distribution of land uses that would or should eventually be developed but is a representation of a reasonably foreseeable buildout scenario based on the above assumptions for purposes of modeling GHG emissions. The real-life distribution of land uses that would generate GHG emissions will vary. Table 3.7-3, Annual Greenhouse Gas Emissions Summary, also shows the two guidance thresholds for potential significance.

TABLE 3.7-3
ANNUAL GREENHOUSE GAS EMISSIONS SUMMARY

Source	Emissions ($MTCO_2e$/yr)
Mobile	13,750
Area	186
Energy	3,035
Water	239
Waste	671
Refrig.	4
Total Operational Emissions	**17,885**
SCAQMD recommended threshold	**3,000**
Exceed threshold?	**Yes**
Service population - persons	8,773
Efficiency threshold – $MTCO_2e$/SP/yr	**1.3**
Efficiency – $MTCO_2e$/SP/yr	**2.0**
Exceed threshold?	**Yes**

$MTCO_2e$/yr: metric tons of carbon dioxide equivalent per year

Notes:

- Area sources include hearths, consumer products, architectural coatings, and landscape equipment.
- Totals may not add due to rounding variances.

Detailed calculations in Appendix B, Air Quality and Greenhouse Gas Emissions Modeling Data.

As shown in Table 3.7-3, calculated GHG emissions exceed both guidance thresholds. It is noted that the calculation of operational GHG emissions is very conservative for the following reasons: (1) The CalEEMod model assumes all vehicles are gasoline or diesel fueled; there is no credit for reduced GHG emissions from electric and hybrid vehicles; (2) No credit was taken for the solar generation of electricity that would be included in future development projects as required by Title 24 or Project implementation; (3) No credit was taken for the increased energy efficiency of all-electric homes and businesses, which would be encouraged, if not required, by the General Plan Update and CAP implementation. The Applicant/Developer of future development projects may demonstrate that the proposed Project is consistent with the City's CAP. If consistency is demonstrated, the Project would have a less than significant GHG emissions impact. Nevertheless, for the Project, operational GHG emissions are considered significant as the Project may generate GHG emissions that would have a significant and unavoidable impact on the environment.

Threshold 3.7b: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

A lead agency may assess the significance of GHG emissions by determining a project's consistency with a local GHG reduction plan or Climate Action Plan (CAP) that qualifies under Section 15183.5 of the State CEQA Guidelines. A CAP is designed to ensure that development within a jurisdiction occurs in a manner that supports the goals of AB 32. The City adopted the South Pasadena 2020 Final CAP in December 2020. As described above, the CAP is a long-range planning document that guides the City towards long-term emissions reductions in accordance with State of California goals. The CAP analyzes emission sources within the City, forecasts future emissions, and establishes emission reduction targets. This CAP is the City of South Pasadena's roadmap to achieving the City's 2030 target and state mandated goal of 40 percent below 1990 levels by 2030, with the ultimate goal of achieving carbon neutrality by 2045. Thus, the CAP is consistent with State plans, policies, and regulations, AB 32, the AB 32 scoping plan and updates, EO B-30-15, SB32, and EO B-55-18.

Table 3.7-4 lists CAP actions from Table 3.7-2 and some of the many General Plan Update and DTSP Update policies and actions from Section 3.7.5. When taking into consideration the City's compact land use pattern, redevelopment primarily targeted to the proposed focus areas, and proximity to transit, incorporation of renewable energy generation, development of EV infrastructure, and compliance with the latest energy efficiency standards, the Project would be consistent with the CAP and is therefore consistent with State plans, policies, and regulations adopted for the purpose of reducing emissions of GHGs.

TABLE 3.7-4
CLIMATE ACTION PLAN ACTIONS, GENERAL PLAN AND DTPS UPDATE POLICIES AND/OR ACTIONS, AND 2021–2029 HOUSING ELEMENT

Climate Action Plan Action	General Plan Update Policy and/or Action	DTSP Update Policy and/or Action	2021–2029 Housing Element
E.1 Maximize the usage of renewable power within the community, by continuing to achieve an opt-out rate lower than 4% for the Clean Power Alliance.	**A5.14a** Require solar panels on all new buildings. Encourage battery back-up systems or generators in key locations throughout the city.	**A3.4c** Encourage solar panels on all new buildings.	**Policy 1.1** Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.
E.2 Electrify 100% of newly constructed buildings.	**A5.14c** Adopt zero net energy building codes.	**A3.4c** Encourage solar panels on all new buildings.	**Policy 1.1** (see above)
E.3 Electrify 5% of existing buildings by 2030 and 80% by 2045.	**P3.13** Implement energy efficient retrofit improvements in existing buildings consistent with the requirements of the City's Climate Action Plan.	**A3.4a** Encourage new and/or renovated buildings to meet USGBC LEED Silver rating or equivalent and advance the City's sustainability goals.	**Policy 1.1** (see above)

TABLE 3.7-4
CLIMATE ACTION PLAN ACTIONS, GENERAL PLAN AND DTPS UPDATE POLICIES AND/OR ACTIONS, AND 2021–2029 HOUSING ELEMENT

Climate Action Plan Action	General Plan Update Policy and/or Action	DTSP Update Policy and/or Action	2021–2029 Housing Element
		A3.4b Incentivize sustainable living and business practices, both passive and active, that encourage energy efficiency, improve indoor air quality, and encourage water and resource conservation.	
E.4 Develop and promote reduced reliance on natural gas through increased clean energy systems that build off of renewable energy development, production, and storage.	**A5.14c** Adopt zero net energy building codes. **A5.14d** Provide builders, businesses, and residents with resources and information about energy efficiency and renewable energy technologies at the Building Permit counters and on the City's website. **A5.14e** Develop a Solar Action Plan to meet 50% of South Pasadena's power demand through solar by 2040.	**A3.4a** Encourage new and/or renovated buildings to meet USGBC LEED Silver rating or equivalent and advance the City's sustainability goals. **A3.4b** Incentivize sustainable living and business practices, both passive and active, that encourage energy efficiency, improve indoor air quality, and encourage water and resource conservation. **A3.4c** Encourage solar panels on all new buildings.	**Policy 1.1** (see above)
T.1 Increase zero-emission vehicle and equipment adoption to 13% by 2030 and 25% by 2045.	**P1.3** Promote the use of energy-efficient vehicles. **A3.14f** Electrify South Pasadena's Vehicles. Develop a city fleet alternative fuel conversion policy and use it to promote residents to convert as well. **A3.14g** Install Electric Vehicle (EV) chargers at public facilities. Encourage property owners to install EV chargers at business and multi-family locations.	**A3.4e** Install Electric Vehicle (EV) chargers at public facilities in Downtown area. Encourage property owners to install EV chargers at Downtown business and multifamily locations.	**Policy 1.1** (see above)

TABLE 3.7-4
CLIMATE ACTION PLAN ACTIONS, GENERAL PLAN AND DTPS UPDATE POLICIES AND/OR ACTIONS, AND 2021–2029 HOUSING ELEMENT

Climate Action Plan Action	General Plan Update Policy and/or Action	DTSP Update Policy and/or Action	2021–2029 Housing Element
T.2 Implement programs for public and shared transit that decrease passenger car vehicle miles traveled 2% by 2030 and 4% by 2045.	**A5.15** Adopt land use patterns that channel all new growth into compact, walkable, bikeable, and transit friendly areas.	**A1.1** Redesign Mission Street and Fair Oaks Avenue to promote walking, biking, ridesharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies.	**Policy 1.1** (see above)
T.3 Develop and implement an Active Transportation Plan to shift 3% of passenger car vehicle miles traveled to active transportation by 2030, and 6% by 2045.	**P1.2** Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel. **P4.6** Provide high-quality pedestrian and bicycle facilities to enhance the safety, comfort and convenience of people walking and bicycling in South Pasadena.	**A1.1** Redesign Mission Street and Fair Oaks Avenue to promote walking, biking, ridesharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies. **P4.7** Encourage and facilitate shared-ride options include e-hailing services, carshare and bikeshare.	**Policy 1.1** (see above)
W.1 Reduce per capita water consumption by 10% by 2030 and 35% by 2045.	**A1.6** Adopt an Urban Forest Management Plan that guides economically sustainable and environmentally friendly strategies for planting, maintaining, and funding trees on public and private property. The Urban Forest Management Plan should include best practices, design standards, tree palettes, implementation locations, integration into the Capital Improvement Program and Stormwater Program, incentives for property owners and requirements for developers, funding opportunities and ballot measures, and water conservation strategies.	**A5.1b** Adopt an Urban Forest Management Plan that guides economically sustainable and environmentally friendly strategies for planting, maintaining, and funding trees on public and private property. **A3.4b** Incentivize sustainable living and business practices, both passive and active, that encourage energy efficiency, improve indoor air quality, and encourage water and resource conservation.	**Policy 1.1** (see above)
CS.1 Increase carbon sequestration through increased tree planting and green space.	**A1.6** Adopt an Urban Forest Management Plan that guides economically sustainable and environmentally friendly strategies for planting,	**A5.1b** Adopt an Urban Forest Management Plan that guides economically sustainable and environmentally friendly	**Policy 1.1** (see above)

TABLE 3.7-4
CLIMATE ACTION PLAN ACTIONS, GENERAL PLAN AND DTPS UPDATE POLICIES AND/OR ACTIONS, AND 2021–2029 HOUSING ELEMENT

Climate Action Plan Action	General Plan Update Policy and/or Action	DTSP Update Policy and/or Action	2021–2029 Housing Element
	maintaining, and funding trees on public and private property. The Urban Forest Management Plan should include best practices, design standards, tree palettes, implementation locations, integration into the Capital Improvement Program and Stormwater Program, incentives for property owners and requirements for developers, funding opportunities and ballot measures, and water conservation strategies.	strategies for planting, maintaining, and funding trees on public and private property.	
M.1 Reduce carbon intensity of City operations.	All policies and actions for the General Plan Update listed in Section 3.7.5 that directly or indirectly contribute to GHG emissions reduction.	All policies and actions for the DTSP Update listed in Section 3.7.5 that directly or indirectly contribute to GHG emissions reduction.	**Policy 1.1** (see above)
M.2 Electrify the municipal vehicle fleet and mobile equipment.	**A1.3a** Continue to control and reduce air pollution emissions from vehicles owned by the City by expanding the use of alternative fuel, electric, and hybrid vehicles in City fleets**.** **A3.15f** Electrify South Pasadena's Vehicles. Develop a city fleet alternative fuel conversion policy and use it to promote residents to convert as well.	—	**Policy 1.1** (see above)
M.3 Increase City's renewable energy production and energy resilience.	**A5.14a** Require solar panels on all new buildings. Encourage battery back-up systems or generators in key locations throughout the city. **A3.14e** Develop a Solar Action Plan to meet 50% of South Pasadena's power demand through solar by 2040.	**A3.4b** Incentivize sustainable living and business practices, both passive and active, that encourage energy efficiency, improve indoor air quality, and encourage water and resource conservation. **A3.4c** Support solar panels on all new buildings.	

The Sustainable Development strategies of the SCAG 2020–2045 RTP/SCS include to: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region (SCAG 2020). As discussed related to the City's CAP, when taking into consideration the City's compact land use pattern, redevelopment primarily targeted to the proposed focus areas, and proximity to transit, the Project would be consistent. The Project's policies and actions, listed in Table 3.7-3 and Section 3.7.5 above, demonstrate that the General Plan and DTSP Update & 2021–2029 Housing Element are consistent with these strategies. The 2020-2045 RTP/SCS implements SB 375. As shown in Table 3.10-1, SCAG 2020–2045 RTP/SCS Consistency Analysis, the Project is consistent with all applicable RTP/SCS goals. Therefore, the Project is consistent with SB 375.Based on the consistency demonstrations above, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. On the contrary, the Project would be fully consistent with the 2016–2045 RTP/SCS, SB 375, as well as SB 743 goals related to reducing GHG emissions through land use intensification, encouraging access to transit, transportation and parking demand management; and providing improved and expanded active transportation (i.e., biking, walking) facilities. As demonstrated in Section 3.14, Transportation, the Project would reduce in a lowering of VMT per capita and VMT per service population compared both to the existing condition and the future (2040) condition without Project implementation. The impact would be less than significant, and no mitigation is required.

3.7.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Because the magnitude of global GHG emissions is extremely large when compared with the emissions of typical development projects, it is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change. CAPCOA's *CEQA and Climate Change Report* states, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective" (CAPCOA 2008). As noted by the CNRA, "Due to the global nature of GHG emissions and their potential effects, GHG emissions will typically be addressed in a cumulative impacts analysis" (CNRA 2009b). Therefore, the analysis presented above represents the cumulative impact analysis for the Project related to GHG emissions. As discussed previously, it is assumed that there would be a significant and unavoidable impact because Project construction related GHG emissions cannot be quantified at this time.

3.7.8 MITIGATION MEASURES

There are no feasible mitigation measures to reduce the identified construction- and operation-related GHG emissions because the finding is based on lack of project-specific details calculate emissions for individual future projects. There is no project to modify with mitigation to reduce or avoid GHG emissions.

3.7.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

GHG Emissions

Significant and unavoidable impacts (only cumulative level impacts apply to GHG emissions).

Plan Consistency

Less than significant impacts at both a program and cumulative level.

3.7.10 REFERENCES

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3.8 HAZARDS AND HAZARDOUS MATERIALS

3.8.1 METHODOLOGY

This section analyzes potential hazards from historic uses in the City, use and transport of hazardous materials, and wildfire hazards associated with implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project). Information in this section was derived from the California Environmental Protection Agency (CalEPA), California Department of Forestry and Fire Protection, City websites, and the Draft General Plan Update.

3.8.2 EXISTING CONDITIONS

Hazardous Materials

Hazardous materials[1] that may be commonly encountered in a typical urban environment generally include petroleum products (including oil and gasoline), automotive fluids (i.e., antifreeze, hydraulic fluid), paint, cleaners (i.e., dry cleaning solvents, cleaning fluids), and pesticides from current or historical agricultural uses (if in significant concentrations). By-products generated as a result of activities using hazardous materials (e.g., dry cleaning solvents, oil, and gasoline) are considered hazardous waste. Contamination, when present, often takes the form of a hazardous material or hazardous waste spill, which can penetrate soils and also potentially reach groundwater, resulting in the pollution of shallow groundwater and/or a local water supply. Commercial and industrial uses, including those that have underground storage tanks and/or use hazardous materials in their operations, are common sources of soils and/or groundwater contamination in urban areas.

The CalEPA has compiled the data resources that provide information regarding the facilities or sites identified as meeting the requirements of Section 65962.5 of the California Government Code, referred to as the Cortese List (CalEPA 2023a). No properties in the City of South Pasadena are identified on the following: the California Department of Toxic Substances Control's (DTSC) Hazardous Waste and Substances Site List (DTSC 2023); the list of sites identified by the State Water Resources Control Board (SWRCB) with waste constituents above hazardous waste levels outside the waste management unit (CalEPA 2023b); the list of active Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB (CalEPA 2023c), or the list of hazardous waste facilities identified by DTSC as subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (CalEPA 2023d). There are a total of 18 (1 open and eligible for closure, 17 closed) sites in the City identified on the list of leaking underground storage tank (LUST) sites from the SWRCB's GeoTracker database (SWRCB 2023). The LUST sites are concentrated along Fair Oaks Avenue, Mission Street, and Huntington Drive.

In addition to the Cortese list resources, the SWRCB's GeoTracker identifies Cleanup Program Sites (CPS; formerly known as the Spills, Leaks, Investigations, and Cleanups database) and DTSC Cleanup Sites, which are separate from the sites listed on the Cortese List. The DTSC Cleanup Sites are also identified on DTSC's EnviroStor database. There are no sites identified on the California Department of Toxic Substances Control's (DTSC) Hazardous Waste and Substances Sites list via its EnviroStor database (DTSC 2023).

[1] A hazardous material, as defined in the Section 25501 of the *California Health and Safety Code,* is "any material that, due to quantity, concentration, or physical or chemical characteristics, poses a significant potential hazard to public health and safety or to the environment, if released into the workplace or the environment".

Wildland Fire Hazards

No portion of the City is identified by the California Department of Forestry and Fire Protection as a very high fire hazard severity zone (VHFHSZ)(CAL FIRE 2023). However, the western and southwestern borders of the City are adjacent to VHFHSZs. The southwestern portion of the City, located west of Meridian Avenue and south of Monterey Road, is a hilly area that is defined as a high fire hazard area by the City within which the South Pasadena Fire Department (SPFD) enforces annual brush clearance requirements to reduce the risks associated with being located adjacent to a wildland interface.

3.8.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was authorized by Congress on October 21, 1976. This law creates the framework for the proper management of hazardous and nonhazardous solid waste. To achieve its goals, RCRA established the following programs:

- The Solid Waste Program encourages States to develop comprehensive plans to manage nonhazardous industrial solid waste and municipal solid waste; sets criteria for municipal solid waste landfills and other solid waste disposal facilities; and prohibits the open dumping of solid waste.
- The Hazardous Waste Program establishes a system for controlling hazardous waste from the time it is generated until its ultimate disposal, in effect from “cradle to grave”.
- The Underground Storage Tank Program regulates underground storage tanks containing hazardous substances and petroleum products.

Emergency Planning and Community Right-To-Know Act

The Emergency Planning and Community Right-to-Know Act was enacted by Congress on October 17, 1986. This Act began as a grassroots right-to-know movement at the State and local levels. Labor unions and citizen activists initially worked together for a common goal: greater protection of the public from chemical emergencies and dangers through public disclosure by business and industry of the chemicals they store, use, and release. This law requires businesses to report on emissions of certain toxic chemicals, and that information is placed into the Toxics Release Inventory (TRI), a publicly accessible database. There are no records of businesses or sites in the City on the most recent TRI records dated 2021 (USEPA 2021).

Hazardous Materials Transportation Act

The main purpose of the Hazardous Materials Transportation Act is to provide adequate protection against risks to life and property inherent in the transport of hazardous materials by improving the regulatory and enforcement authority of the Secretary of Transportation. This Act contains requirements for hazardous materials classification, hazard communication, packaging requirements, operational rules, training and security, and registration.

State

California Hazardous Waste Control Act

The California Hazardous Waste Control Act (HWCA), as found in the *California Health and Safety Code* (Section 25100, et seq.), authorizes the DTSC and local Certified Unified Program Agencies (CUPA) (i.e., the City of South Pasadena) to regulate facilities that generate or treat hazardous waste.

Certified Unified Program Agency

In 1993, Senate Bill 1082 created the CUPA to foster effective partnerships between local, State, and federal agencies. The program consolidated the administrative, permitting, inspection, and enforcement activities of the following environmental and emergency management programs:

- Hazardous Materials Release Response Plans and Inventories (Business Plans);
- California Accidental Release Prevention Program;
- Underground Storage Program;
- Aboveground Petroleum Storage Act Program;
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs; and
- California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements.

CUPA is implemented at the local level by government agencies certified by the Secretary of the CalEPA. The City of South Pasadena is a CUPA.

California Accidental Release Prevention Program

The California Accidental Release Prevention Program (CalARP) is a merging of the Federal Accidental Release Prevention Program and State programs for the prevention of accidental release of regulated toxic and flammable substances. Stationary sources exceeding a threshold quantity of regulated substances are evaluated under this program to determine the potential for and impacts of accidental releases from the source. Depending on the potential hazards, the owner or occupant of a stationary source may be required to develop and submit a risk management plan. The CalARP is administered by the CUPA.

Lead Abatement

Because of its toxic properties, lead is regulated as a hazardous material. Inorganic lead is also regulated as a toxic air contaminant. In California, lead abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services. In addition, the California Division of Occupational Safety and Health (better known as the California Occupational Safety and Health Administration [CalOSHA]) has adopted regulations to protect worker safety during potential exposure to lead under Title 8 of the *California Code of Regulations* (Section 1532.1 Lead). All demolition that could result in the release of lead must be conducted according to these standards, which were developed to protect the general population and construction workers from respiratory and other hazards associated with lead exposure.

Asbestos Abatement

Asbestos is a known human carcinogen and the United States Environmental Protection Agency and CalEPA have identified asbestos as a hazardous air pollutant pursuant to Section 12 of the Federal Clean Air Act. Further, the California Air Resources Board has identified asbestos as a Toxic Air Contaminant pursuant to the *California Health and Safety Code* (Section 39650 et seq.). Asbestos is also regulated as a potential worker safety hazard under the authority of the CalOSHA. These rules and regulations prohibit emissions of asbestos from asbestos-related demolition or construction activities; require medical examinations and monitoring of employees engaged in activities that could disturb asbestos; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local government agencies prior to beginning renovation or demolition that could disturb asbestos.

In California, asbestos abatement must be performed and monitored by contractors with appropriate certifications from the California Department of Health Services. In addition, CalOSHA has regulations to protect worker safety during potential exposure to asbestos under Title 8 of the *California Code of Regulations* (Section 1529 Asbestos). All demolition that could result in the release of asbestos must be conducted according to CalOSHA standards. These standards were developed to protect the general population and construction workers from respiratory and other hazards associated with exposure to these materials.

Wildland-Urban Interface Fire Area Building Standards

Title 24, Part 2 of *California Code of Regulations*, also known as the 2019 California Building Code, addresses building standards for new structures constructed in or near a designated fire hazard severity zone. New buildings located in any fire hazard severity zone must comply with all sections of the current building code. Specifically, minimum standards are established for materials and to provide a reasonable level of protection from wildfire exposure for buildings in Wildland-Urban Interface Fire Areas. Ignition-resistant materials and design are required to reduce the risk from flame or burning embers projected by a vegetation fire.

Regional

Asbestos Removal

The South Coast Air Quality Management District's (SCAQMD's) Rule 1403 provides guidelines for the proper removal and disposal of asbestos-containing materials. In accordance with Rule 1403, structures that may contain asbestos are required to be subject to an asbestos survey by a Certified Asbestos Consultant (certified by CalOSHA) to identify building materials that contain asbestos. Under this rule, removal of asbestos must include prior SCAQMD notification; compliance with removal procedures and time schedules; asbestos-handling and clean-up procedures; and storage, disposal, and landfilling requirements.

Countywide Household Hazardous Waste Program

The County Department of Public Works' Hazardous Waste Management Division organizes regular household hazardous waste "round-ups" for residents to discard refuse items such as paints, oils, or pesticides that require special handling. Household hazardous waste roundups are held nearly every week, typically on Saturdays, at various locations throughout the County. The County also provides information on the locations of motor oil recycling centers. The City hosts household hazardous waste (HHW) and electronic waste collection events, generally on an

annual basis in the fall, and provides information the on the City's website[2] regarding how and where to properly dispose of many categories of materials, including HHW, less hazardous products, and used motor oil.

City

Local Hazard Mitigation Plan

The City has prepared a *Public Review Draft City of South Pasadena Local Hazard Mitigation Plan 2023-2028* (LHMP), which was released for public review through June 15, 2023. While not yet adopted by the City, it is expected a LHMP will be adopted within the planning horizon of the Project.

A Hazard Mitigation Plan is a framework that guides in making decisions and developing policies to reduce or eliminate risks to life and property. The LHMP identifies the types of hazards that threaten the City, evaluates our vulnerability to those threats, and outlines a strategy to reduce or eliminate the risk posed by those threats. The LHMP then provides a set of strategies intended to reduce risk from natural hazards through education and outreach programs, foster the development of partnerships, and implement risk reduction activities (South Pasadena 2023).

Municipal Code

Article VI, Hazardous Materials, South Pasadena Certified Unified Program Agency

The City of South Pasadena has adopted by reference all applicable State statutes for implementation of Section 25404 et. seq. of the California Health and Safety Code with respect to formation and implementation of a CUPA. Sections 17.59 through 17.70 of the South Pasadena Municipal Code (SPMC) defines the roles and responsibilities of the City in maintaining a hazardous materials list (Sections 17.61 through 17.65). Section 17.61(a) of the SPMC states that: "Hazardous material shall mean any substance or product found on the California Occupational Safety and Health Administration list or which is listed as a radioactive material set forth in Chapter 1, Title 10, Appendix B, maintained by the Nuclear Regulatory Commission; and Section 17.61(b) states that "Hazardous waste shall mean hazardous or extremely hazardous waste as defined by Sections 25115 and 25117 of the California Health and Safety Code and as set forth in Sections 66680 and 66685 of Title 22 of the California Administrative Code". It also defines the authority of the SPFD Fire Chief to enforce the provisions of the CUPA, which may include the inspection of hazardous materials in use, storage, or disposal; review of hazardous material records; and the sampling and testing of hazardous materials. Section 17.70 of the SPMC states "The fire department is authorized to clean up or abate the effects of any hazardous material deposited upon or onto public or private property or facilities of the city, and any person or persons who intentionally or negligently caused such deposit shall be liable for the payment of all costs incurred by the fire department as a result of such clean up or abatement activity."

[2] https://www.southpasadenaca.gov/government/departments/public-works/environmental-programs/waste-reduction/hazardous-waste.

3.8.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse hazards and hazardous materials impact if it would:

Threshold 3.8a: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Threshold 3.8b: 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;

Threshold 3.8c: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

Threshold 3.8d: 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;

Threshold 3.8e: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;

Threshold 3.8f: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or

Threshold 3.8g: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.8.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P5.3 Proactively plan for rapid post-disaster recovery of local businesses.

A5.3a Update the City's Hazard Mitigation Plan to address rapid post-disaster within the local business community.

A5.3b Explore the creation of a Business Disaster Assistance Center that would become operational when needed.

P5.7 Provide reliable Wi-Fi to provide connectivity during emergency.

A5.7a Require new developments to offer free Wi-Fi, and ensure that if there is power to the building, there is Wi-Fi available during emergencies.

A5.7b Utilize the City's street lights to provide Wi-Fi in key areas of the city, especially during emergencies.

P7.4 Minimize risk to life and property damage from brushfires.

A7.4a Require fire-resistant building materials for all structures in hillside areas and encourage use of fire-resistant landscaping.

A7.4b Require house sprinklers, where determined necessary by the Fire Department.

A7.4c Require adequate fire flow and emergency access as a condition of approval for discretionary entitlements within Hillside areas.

P7.6 Maintain multi-jurisdictional programs to protect residents from the risks of fires, floods, seismic events, other natural hazards, and crime.

A7.6a Develop a rapid response team to respond to areas that regular emergency response vehicles cannot access.

A7.6b Periodically review and update the post-disaster recovery plan.

A7.6c Provide timely disaster updates and emergency notifications to community members, in multiple languages and formats as appropriate.

A7.6d Install signs in hillside neighborhoods directing residents to the closest evacuation route or shelter, with the ability to provide real-time information.

A7.6e Work with transit agencies and community-based organizations to create an evacuation plan for residents without access to personal vehicles.

A7.6f Upon the next revision of the Local Hazard Mitigation Plan, identify evacuation routes and their capacity, safety, and viability, and evacuation locations, under a range of emergency scenarios.

Downtown Specific Plan Update

P5.9 Minimize personal and property damage resulting from seismic hazards.

A5.9 Require structural reinforcement of all inventoried unreinforced masonry structures.

2021–2029 Housing Element Implementation Programs

There are no Housing Element Implementation Programs goals or policies related to hazards and hazardous materials.

3.8.6 ENVIRONMENTAL IMPACTS

Threshold 3.8a: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction activities associated with new development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, or public or infrastructure projects in the City, would commonly involve the use of hazardous materials for construction, such as paints, thinners, solvents, acids, curing compounds, grease, oils, and other chemicals, which could pose risks to construction workers or lead to soil and groundwater contamination, if not properly stored, used, or disposed.

Operation of future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs is not expected to utilize or generate hazardous materials or wastes in quantities that would pose a significant hazard to the public. The proposed increase in non-residential uses is limited to office and retail development, and no new industrial/manufacturing land uses that would more likely handle hazardous materials are proposed. The proposed dwelling units would use hazardous materials (e.g., paint, pesticides, cleansers, and solvents) for maintenance activities but any use would be in limited household quantities. The proposed dwelling units would not utilize, store, or generate hazardous materials or wastes in quantities that would pose a significant hazard to the public, similar to the existing conditions. These hazardous materials would be stored and used at individual sites and may create a public health and safety hazard through routine transport, use, or disposal. However, the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not substantively alter this risk when compared with the existing land uses in the City.

A number of existing regulations require that industrial and commercial users, generators, and transporters provide operational safety and emergency response measures, so that no major threats to public health and safety are created. Compliance with existing hazardous material regulations, described in Section 3.8.3 above, would prevent undue hazards. As discussed above, the City is a CUPA and maintains and enforces a hazardous material list[3].

Through compliance with existing regulations, impacts related to the routine transport, use and disposal of hazardous materials would be less than significant, and no mitigation is required.

Threshold 3.8b: Would the Project 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?

As discussed under Threshold 3.8a, future development could involve the use of chemical agents, solvents, paints, fuel for equipment, and other hazardous materials that are associated with construction. These materials are common to typical construction activities, and compliance with existing hazardous material regulations on the storage, use, and disposal of hazardous materials at construction sites would prevent hazards to the public or environment through reasonably foreseeable upset or accident conditions. Construction activities in the City would also occur on a temporary and intermittent basis, and at staggered schedules as individual development projects are implemented throughout the planning period of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

Redevelopment activities that involve demolition or reuse of existing buildings may result in the need to remove and dispose of asbestos-containing materials and/or lead-based paint, dependent on the age of the structure. Compliance with SCAQMD Rule 1403, the CalOSHA regulations on asbestos and lead abatement, would ensure that handling and disposal of these materials is conducted safely, and accident conditions would not be reasonably foreseeable.

[3] Section 17.61(a) of the SPMC states that: “Hazardous material shall mean any substance or product found on the California Occupational Safety and Health Administration list or which is listed as a radioactive material set forth in Chapter 1, Title 10, Appendix B, maintained by the Nuclear Regulatory Commission; and Section 17.61(b) states that “Hazardous waste shall mean hazardous or extremely hazardous waste as defined by Sections 25115 and 25117 of the California Health and Safety Code and as set forth in Sections 66680 and 66685 of Title 22 of the California Administrative Code”.

In addition to the identified hazardous materials sites, as discussed above, there may be sites in the City impacted by hazardous materials or hazardous wastes from historic use that are not identified on current databases. Therefore, MM HAZ-1 requires that a Phase I Environmental Site Assessment (ESA) be prepared by the Applicant for future development projects and submitted to the City. If the Phase I ESA identifies the potential for on-site contamination, MM HAZ-1 describes a series of actions required by the Applicant up to, if warranted, remediation of contaminated conditions and submittal of a closure report or equivalent documentation to the City and the assigned regulatory oversight agencies (e.g., DTSC, Los Angeles Regional Water Quality Control Board [RWQCB]). The final step is the process described in MM HAZ-1, as appropriate, for each proposed development site that shall be completed prior to issuance of a grading permit by the City. If, even with implementation of MM HAZ-1, unanticipated contamination is encountered during construction of a project, MM HAZ-1 requires that all activities in the immediate vicinity of the suspect contamination cease and the City is notified. The Applicant would be responsible for the preparation of a Risk Management Plan to identify the contaminants of concern and their risks and describes measures to protect workers and the public from exposure to potential site hazards. Depending on the nature of the contamination, appropriate regulatory oversight agencies shall be notified. Through compliance with MMs HAZ-1 and HAZ-2 and implementation of any necessary soil and/or water remediation under the RCRA, the HWCA, and CalARP, safe and appropriate remediation (i.e., cleanup) of affected sites prior to their redevelopment and reuse would be ensured. Thus, with mitigation, there would be a less than significant impact from the use and disposal of common, construction-related hazardous materials or encounter of hazardous materials during redevelopment activities due to accident conditions.

As discussed under Threshold 3.8a, the Project does not propose industrial/manufacturing land uses that would more likely handle hazardous materials. As discussed above, the proposed dwelling units would use hazardous materials (e.g., paint, pesticides, cleansers, and solvents) for maintenance activities but any use would be in limited household quantities. The dwelling units would not utilize, store, or generate hazardous materials or hazardous wastes in quantities that would pose a significant hazard to the public, similar to the existing residential development in the City. These users would be subject to various State and federal regulations on storage, use, handling, transport, or disposal of hazardous materials and hazardous wastes, as discussed in Section 3.8.3. Compliance with pertinent regulations would avoid the creation of a significant hazard to the public and reduce the potential for the release of hazardous materials into the environment.

Through compliance with MMs HAZ-1 and HAZ-2 and existing regulations, impacts related to the potential for accidental release of hazardous materials would be less than significant.

Threshold 3.8c: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

All schools in the City are located near residential or civic land uses where hazardous materials use is limited. However, given the modest size of the City, some existing schools are within 0.25 mile of one or more focus areas, which would have a mixed-use land use designation and may include retail and office uses that could handle materials classified as hazardous, as discussed under Thresholds 3.8a and 3.8b. However, no industrial/manufacturing land uses that would more likely handle hazardous materials are proposed. Proposed commercial/retail and office land uses would not be expected to result in hazardous emissions or handle acutely hazardous materials or substances that could pose hazards to nearby school children in the event of an accidental release or spill. These would be similar land uses to what are already present in

portions of the City, and the proposed commercial/retail and office land uses would not present a new hazard to schools. Residential activities associated with occupancy of the proposed dwelling units would be similar to other residential uses in the area and would not generate hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste in quantities that may impact students at schools within 0.25 mile of the site. As with existing residential, commercial, and light industrial land uses in the City, compliance with existing regulations related to transport, use, and disposal of hazardous materials would ensure that any schools located within 0.25 mile of a proposed development that would have hazardous materials typical of urban environments would not be adversely affected.

Through compliance with existing regulations, impacts related to exposure of school-aged children to hazardous emissions, materials, substances, or wastes would be less than significant, and no mitigation is required.

Threshold 3.8d: Would the Project 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?

As discussed above, there are a total of 18 sites in the City identified on the list of leaking LUST sites from the SWRCB's GeoTracker database, which are concentrated along Fair Oaks Avenue, Mission Street, and Huntington Drive. These sites are compiled as part of the Cortese List, compiled pursuant to Section 65962.5 of the Government Code. In addition, there are seven SWRCB CPS sites and five DTSC Cleanup Sites identified via the GeoTracker database, which is not part of the Cortese list. Of these, one CPS site is in the "site assessment" phase, and one DTSC site is "active" and undergoing a voluntary cleanup. The remaining CPS sites have a status of either "open-inactive" or "completed-case closed". The remaining DTSC sites have a status of "no further action", "certified O&M-land use restrictions only", or "refer: other agency" and are not undergoing cleanup activities (SWRCB 2023). These findings are typical of urban environments with uses such as gas stations, automotive repair facilities, dry cleaners, medical facilities, and municipal facilities and do not ordinarily represent conditions that are hazardous to the general public. As discussed under Threshold 3.8b, MMs HAZ-1 and HAZ-2 require actions by the Applicant for future development projects to characterize the potential risk associated with historic and/or current land uses on the proposed project site such that the contamination, if any, is addressed prior to construction and occupancy of that project.

Through compliance with MMs HAZ-1 and HAZ-2 and existing regulations, impacts related to the potential location of a site of the Cortese list would be less than significant.

Threshold 3.8e: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?

The nearest airport is the San Gabriel Valley Airport, located at 4233 Santa Anita Avenue, El Monte, approximately six miles east-southeast of the City at the nearest points. There would be no impact, and no mitigation is required.

Threshold 3.8f: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction activities on public rights-of-way may temporarily block traffic and access near the construction zone. As discussed above, compliance with Section 36.310.090 of the SPMC in the design and construction of future projects would always maintain emergency access to individual parcels. Impacts on traffic flows for emergency response or evacuation would be less than significant during construction activities, and no mitigation is required.

The City has a developed roadway network that provides emergency access and evacuation routes to existing development. Evacuation routes include major roadways in the City, with the State Route 110 and Interstate 210 freeways serving as primary regional exit routes. These freeways provide area-wide evacuation routes, with major north-south and east-west roadways in the City connecting to the freeways and adjacent cities. No major change to the existing roadway system serving the City is proposed. Access to individual development sites would be available through existing or planned on-site roadways/driveways, as required under Section 36.310.090 “Driveways and Site Access” of the SPMC. Section 36.310.090 of the SPMC defines requirements for all access from public streets to private property to ensure adequate and safe access by vehicular and other traffic. The plan check and building permit process by the SPFD includes review of access for emergency vehicles in accordance with the *California Fire Code*, as adopted by reference by the City (Chapter 14 of the SPMC). Compliance with the requirements for emergency lane width, vertical clearance, and distance would provide adequate emergency access to all new development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs and public and infrastructure projects. Continued implementation of State and City emergency access requirements would provide future development with adequate access for emergency response or evacuation.

The proposed General Plan Update includes actions to update the City’s Hazard Mitigation Plan to address disaster recovery in the business community, explore the development of a Business Disaster Assistance Center, develop a rapid response team to support safe evacuation in the hillside areas, and periodically review and update the City’s post-disaster recovery plan. Also, the City has an Emergency Management Program, which includes all elements necessary to respond quickly and effectively to major emergencies. These elements include: Emergency Operations Plan, Emergency Operations Center, Emergency Response Program, and Public Education Program.

With implementation of the policies and actions identified above and continued implementation of the City’s emergency response programs, impacts related to emergency response and evacuation would be less than significant, and no mitigation is required.

Threshold 3.8g: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Individual development projects would be reviewed by the SPFD as part of the City’s project review process and would be required to comply with all State (CBC) and City fire code standards in effect at the time the building permit is issued, pursuant to Chapter 14, Fire Prevention, of the SPMC. Section 14.4 of the SPMC includes requirements for building construction, fire flows and pressures, hydrant placement and other requirements that would reduce the creation of fire hazards and facilitate emergency response. In addition to City-wide fire code standards,

Section 14.1 of the SPMC requires that development of any parcels in the High Risk Fire Area would be required to have Class A roof assemblies, which are effective against severe fire test exposures, with exceptions including, but not limited to, installation of an entirely non-combustible roof assembly, clay or concrete tile or ferrous or copper shingles or sheets on an entirely non-combustible substructure, and timing and amount of roof replacements.

Also, as discussed under Threshold 3.8f, the proposed General Plan Update includes actions to update the City's Hazard Mitigation Plan to address disaster recovery in the business community, explore the development of a Business Disaster Assistance Center, develop a rapid response team to support safe evacuation in the hillside areas, and periodically review and update the City's post-disaster recovery plan. Also, the City has an Emergency Management Program, which includes all elements necessary to respond quickly and effectively to major emergencies. These elements include: Emergency Operations Plan, Emergency Operations Center, Emergency Response Program, and Public Education Program.

While implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not exacerbate existing fire hazards in the area, the Project has the potential to introduce additional development and population into a wildfire hazard area. However, through compliance with State and local fire code requirements, continued implementation of the City's emergency response programs, and implementation of the policies and actions identified above, the Project would not directly or indirectly expose people or structures to a significant wildfire-related risks. There would be a less than significant impact related to wildfires, and no mitigation is required.

3.8.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

The cumulative impacts related to hazards and hazardous materials are analyzed within the San Gabriel Valley (Valley). Existing developments in the Valley pose risks to public health and safety, as they relate to the use, storage, handling, generation, transport, and disposal of hazardous materials. Future development in the City and in the rest of the San Gabriel Valley would increase these risks as more facilities or operations utilize hazardous materials; are located near airports; and are developed in hillside areas identified as high risk fire areas by the City.

Existing regulations for a variety of activities and uses relate to the protection of public health and safety at all levels of government. Future development projects in the Valley would also need to be made part of emergency planning efforts for natural or manmade disasters that may occur in the area. Compliance of individual projects with pertinent regulations would preserve public health and safety and would prevent hazards to existing and future developments. Thus, future growth and development in the Valley is not expected to present significant risks to public health and safety with compliance with regulations. Future growth and development in the Valley would also be subject to review and approval by the SPFD, other jurisdictional fire departments/agencies, and the County Fire Department for fire safety and preparedness, as well as the provision of adequate emergency access and evacuation. Compliance with pertinent requirements of the fire agencies would prevent the creation of fire hazards and would reduce wildland fire hazards.

The proposed Project's compliance with existing health and safety regulations, and MMs HAZ-1 and HAZ-2, outlined in this section would prevent the creation of health risks and public safety hazards. Therefore, the Project's contribution to cumulative impacts would be less than significant.

3.8.8 MITIGATION MEASURES

MM HAZ-1 Prior to the issuance of a grading permit, Applicants for future development projects shall:

1) Investigate the project site to determine whether it or immediately adjacent areas have a record of hazardous material contamination via the preparation of a Phase I Environmental Site Assessment, which shall be submitted to the City Community Development Department for review. If the Phase I ESA concludes there are recognized environmental conditions that indicate the potential for on-site contamination, the Applicant shall direct the performance of a subsurface investigation appropriate in scope to the likely contaminants (e.g., water, soil, soil vapor). The results of the investigation shall be submitted to the City.

2) If contamination is identified on the site, the City, in accordance with appropriate regulatory oversight agencies (e.g., California Toxic Substances Control, Los Angeles Regional Water Quality Control Board), shall determine the need for further investigation and/or remediation of the site. If further investigation or remediation is required, it shall be the responsibility of the Applicant(s) to complete such investigation and/or remediation to the satisfaction of the City and the local oversight agency(ies).

3) Closure reports or other reports that document the successful completion of required remediation activities, if any, shall be submitted to and approved by acceptable to the City (as the Certified Uniform Program Agency) and the local oversight agency(ies) prior to the issuance of a grading permit for the proposed site development.

MM HAZ-2 In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction, construction activities in the immediate vicinity of the contamination shall cease immediately and the City shall be notified. If contamination is encountered, the Applicant for the proposed development shall be responsible for preparing and implementing a Risk Management Plan that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development and (2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures could include, but not be limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate oversight agencies shall be notified. If determined necessary by the oversight agency(ies), a Site Health and Safety Plan that meets California Occupational Safety and Health Administration requirements shall be prepared and in place prior to commencement of work in any contaminated area.

3.8.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative level.

3.8.10 REFERENCES

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3.9 HYDROLOGY AND WATER QUALITY

3.9.1 METHODOLOGY

This section describes the hydrology and water quality characteristics in the City of South Pasadena (City) and analyzes potential impacts on hydrology and water quality that may occur with implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project). Information presented in this section was derived from the City information, information from the City Public Works Department staff, the existing General Plan, Federal Emergency Management Agency (FEMA), California Department of Water Resources, Los Angeles Regional Water Quality Control Board (RWQCB), Los Angeles County Flood Control District, and the *City of South Pasadena Final Draft 2020 Urban Water Management Plan* dated September 2021 (South Pasadena 2021).

3.9.2 EXISTING CONDITIONS

Hydrology

Surface Water

The Los Angeles River drains an area of about 824 square miles along its 55-mile length. The main tributaries to the lower stretch of this river include the Arroyo Seco, the Rio Hondo, and Compton Creek. The City of South Pasadena is located within the watershed of the Los Angeles River, which drains through the Arroyo Seco tributary within the western portion of the City. This portion of the stream is concrete-lined with no native substrate, and it flows through the Lower Arroyo that provides both undisturbed open space and public recreation opportunities such as the Arroyo Park, Arroyo Woodland and Wildlife Nature Park, and the Arroyo Seco Golf Course.

Storm Drainage

Storm drainage in the City is provided by curbs and gutters along streets, which direct storm water into the catch basins, pipes, and washes that run southerly in or near the City and are maintained by the City's Department of Public Works. City-maintained storm water management facilities are present throughout the City, which connect to regional flood-control and runoff conveyance facilities. While the primary purpose of the storm drain system is to reduce or eliminate flood hazards, the system carries both dry and wet weather urban runoff[1] and the pollutants associated with activities from urban land that are transported by runoff.

Groundwater

The City is underlain by the Main San Gabriel Groundwater Basin (Basin). Exhibit 3.9-1, Groundwater Basins, shows the boundaries of the underlying groundwater basin. As shown, the City is situated in the northwest corner of the area encompassed by the Basin. The Main San Gabriel Basin includes the entire valley floor of San Gabriel Valley, except for the Raymond Basin and Puente Basin. The boundaries of the Basin are the Raymond Basin on the northwest, the base of the San Gabriel Mountains on the north, the groundwater divide between the cities of San Dimas and La Verne and the lower boundary of the Puente Basin on the east, and Whittier Narrows on the southwest. Subbasins within the Basin include the Upper San Gabriel Canyon

[1] Dry weather urban runoff, also referred to as nuisance runoff, occurs when there is no precipitation-generated runoff. Wet weather urban runoff refers collectively to diffuse source discharges that result from precipitation events.

Basin, Lower San Gabriel Canyon Basin, Glendora Basin, Foothill Basin, Way Hill Basin, and San Dimas Basin. In addition, the Puente Basin is tributary to the Basin from the southeast, between the San Jose and Puente Hills (DWR 2004).

Pumping and recharge of the Basin is administered by the Main San Gabriel Basin Watermaster (Watermaster), as it has been an adjudicated water basin since 1973. The Basin has a freshwater storage capacity of about 8.7 million acre-feet (af), of which the top 125 feet of storage, or about 1.0 million af has been used for historic Basin operations. Local runoff is stored in a series of reservoirs operated by the Los Angeles County Department of Public Works and diverted into spreading grounds to replenish the groundwater supply. In addition to groundwater replenishment with local storm water runoff, the Watermaster maintains records of each producer's water rights and annual production. Although there is no limit on the quantity of water that may be produced, production in excess of a water right is subject to a Replacement Water assessment. The Watermaster uses funds collected from producers' overproduction to purchase imported water from municipal water districts. The Upper San Gabriel Valley Municipal Water District and the Three Valleys Municipal Water District (TVMWD) obtain their water from the Metropolitan Water District of Southern California (MWD). The San Gabriel Valley Municipal Water District has its own contract for State Water Project water. The Watermaster coordinates purchase and delivery of imported water to replenish the Basin, thus offsetting the producers' overproduction and making the Basin whole (South Pasadena 2021). Refer to Section 3.15, Utilities and Service Systems, of this PEIR for additional discussion of the Main San Gabriel Groundwater Basin.

Water Quality

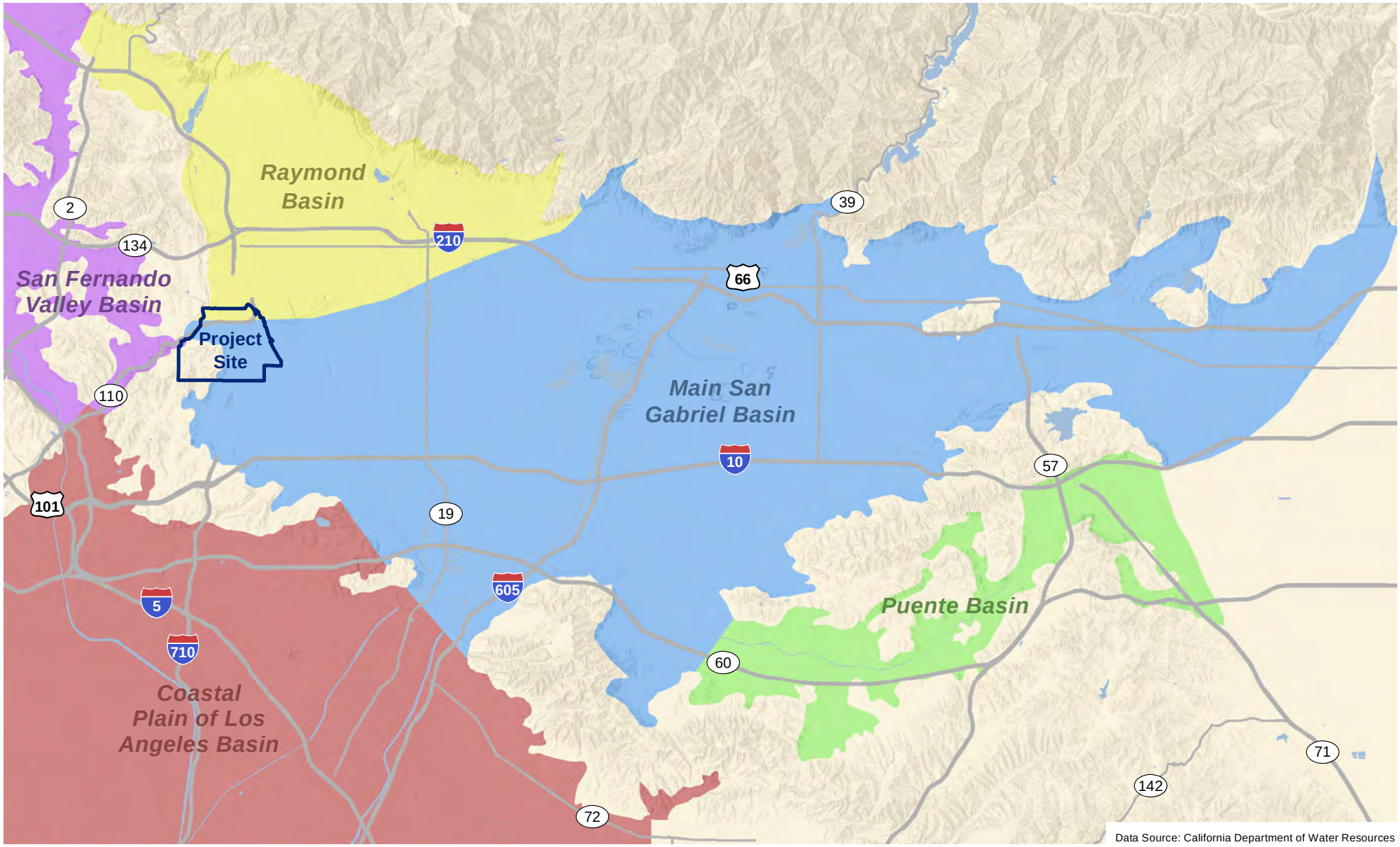
Surface Water Quality

Water bodies that do not meet water quality standards are deemed "impaired" and, under Section 303(d) of the federal Clean Water Act, are placed on a list of impaired waters for which a total maximum daily load (TMDL) must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a "factor of safety"). Once established, the TMDL is allocated among current and future pollutant sources to the water body.

Runoff from the City of South Pasadena flows into the Alhambra Wash, to the southeast, and the Arroyo Seco, to the west. The Alhambra Wash is listed as "impaired" for ammonia; a TMDL for ammonia is expected to be completed in 2027 (SRWCB 2022). Reaches 1 and 2 of the Arroyo Seco are listed for indicator bacteria and trash; TMDLs have been established for both impairments for both Reach 1 and Reach 2 of the Arroyo Seco (SWRCB 2022). While the impairment listing of the Arroyo Seco is not directly attributable to pollutants and land uses in South Pasadena, discharges from the City are subject to the discharge limitations of the established TMDLs.

Groundwater Quality

The City has four wells located within the Main Basin: Graves Well No. 2, Wilson Well No. 2, Wilson Well No. 3, and Wilson Well No. 4 with approximate pumping capacities of 705 gallons per minute (gpm), 750 gpm, 1,960 gpm and 1,100 gpm, respectively. The City installed a volatile organic compound (VOC) treatment system (Granular Activated Carbon and Ion Exchange) at Graves Well No. 2 in 2020. As of June 2018, Wilson Well No. 2 has been inactive, but City staff indicated there are plans to rehabilitate the Wilson Well No. 2 by 2025. The City installed a VOC treatment system (Granular Activated Carbon treatment) at Wilson Wells No. 3 and No. 4 in



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Groundwater Basins

Exhibit 3.9-1

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

N W E S

3.25 1.625 0 3.25 Miles

PSOMAS

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December 2018. The current collective well capacity from Graves Well No. 2, Wilson Wells No. 3, and No. 4 is about 4,960 gpm or about 7.1 million gallons per day (mgd). By 2045, the collective capacity from Graves Well No. 2, Wilson Wells No. 2, No. 3, and No. 4 is anticipated to be about 4,500 gpm or about 6.5 mgd. Assuming the City wells were limited to 75 percent of capacity during calendar years 2020 through 2045, the available pumping capacity would be about 5.3 mgd (about 5,900 af) in 2021 and about 4.9 mgd (5,500 af) in 2045.

Over the past 20 years, the City's groundwater production has ranged from approximately 1,950 afy to approximately 5,264 afy, with an average production of approximately 4,026 afy (Watermaster 2020).

Dam Inundation

Devil's Gate Dam is located approximately five miles north of the northwesterly City boundary. This dam is owned and operated by the Los Angeles County Flood Control District (LACFCD) and is a concrete gravity dam. Dam failure could lead to the sudden release of waters and the creation of inundation hazards to downstream areas. Extensive retrofitting was completed in early 1998 and approved by the California Department of Water Resources, Division of Safety of Dams (South Pasadena 1998). The LACFCD has recently removed 1.7 million cubic yards of accumulated sediment from the reservoir behind Devil's Gate Dam, which was adversely affecting its capacity and function as a flood control facility including identification of areas within South Pasadena that could be adversely affected by certain storm events. Therefore, the capacity of the facility to accommodate future storm water flows and sediment has been restored. Portions of the Lower Arroyo Seco and adjacent open space uses within the City are identified within the dam inundation zone from a failure of Devil's Gate Dam. Specifically, the San Pascual Stables, Arroyo Park, and Arroyo Seco Golf Course have the potential to be inundated from a Devil's Gate Dam failure (DSOD 2023).

3.9.3 RELEVANT PROGRAMS AND REGULATIONS

Sections 401 and 404 of the Clean Water Act

Section 401 of the Clean Water Act (CWA, *United States Code* [USC], Title 33, Sections 1251 et seq.) requires that any person applying for a federal permit or license that may result in a discharge of pollutants into "waters of the U.S." obtain a State water quality certification which concludes that the activity complies with all applicable water quality standards, limitations, and restrictions. Subject to certain limitations, no license or permit may be issued by a federal agency until a Section 401-required certification has been granted. Further, no license or permit may be issued if certification has been denied. The CWA Section 404 permits and authorizations, described in the next paragraph, are subject to Section 401 certification by the local RWQCBs.

Section 404 of the CWA is a program that regulates the discharge of dredged and fill material into "waters of the U.S.", including wetlands. Activities in "waters of the U.S." that are regulated under this program include fills for development (including physical alterations to drainages to accommodate storm drainage, stabilization, and flood-control improvements); water resource projects (e.g., dams and levees); infrastructure development (e.g., highways and airports); and conversion of wetlands to uplands for farming and forestry. The U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers have issued Section 404(b)(1) Guidelines (*Code of Federal Regulations*, Title 40, Section 230) that regulate dredge and fill activities, including water quality aspects of such activities. Subpart C of Sections 230.20–230.25 contains water quality regulations applicable to dredge and fill activities. Among other topics, these guidelines

address discharges that alter substrate elevation or contours; suspended particulates and water clarity; nutrients and chemical content; current patterns and water circulation; water fluctuations (including those that alter erosion or sediment rates); and salinity gradients.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program is authorized by the federal CWA and regulates point sources that discharge pollutants into "waters of the U.S.". Point sources are discrete conveyances such as pipes or man-made ditches. Examples of pollutants include, but are not limited to, rock, sand, dirt as well as agricultural, industrial, and municipal waste discharged into "waters of the U.S.". Point sources that discharge into municipal sewer systems (e.g., residential wastewater conveyance pipes) do not require individual permits, but the sewer systems do require an NPDES permit.

In California, responsibility for implementing the NPDES program has been delegated to the State Water Resources Control Board (SWRCB) and the nine RWQCBs acting under the auspices of the state board. The State and regional boards typically issue NPDES permits that also include waste discharge requirements (WDRs) under State law. The Los Angeles County MS4 permit and the State General Construction Permit have been issued as NPDES permits and as WDRs and are discussed in more detail below. The City's storm water permitting is discussed further below.

Federal Emergency Management Act- Executive Order 11198

In 1977, the President of the United States issued Executive Order 11198 to regulate impacts associated with development within a designated 100-year floodplain. This Executive Order is implemented through FEMA's Floodplain Mapping Program and through federal agency review of projects that may require federal permits or approvals. Flood hazard areas identified on the Flood Insurance Rate Map are identified as Special Flood Hazard Area (SFHAs). SFHAs are areas that will be inundated by a flood event and have a one percent chance of being equaled or exceeded in any given year. The areas of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2-percent-annual-chance flood, are labeled "Zone C" or "Zone X". The entirety of the City is designated "Zone X" (FEMA 2023).

State

California Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act)(*California Water Code,* Sections 13000 et. seq.) is California's primary statute governing water quality and water pollution issues, including sediment transport and protection of surface waters and groundwater. The Porter-Cologne Act provides the SWRCB and nine RWQCBs the authority to protect water quality and is the primary vehicle for implementing California's responsibilities under the federal CWA. Each RWQCB must formulate and adopt a water quality control plan (commonly referred to as a basin plan) for the region within its jurisdiction. The basin plan must conform to the policies set forth in the Porter-Cologne Act and the State water policy established by the SWRCB. The basin plan establishes beneficial uses for surface and groundwaters in the region and includes narrative and numeric water quality standards to protect those beneficial uses. Each RWQCB is also authorized to include water discharge prohibitions applicable to particular conditions, areas, or types of waste within its jurisdiction. The Act requires that, unless otherwise authorized by a general or other permit, reports of waste discharges to regulated waters of the state must be provided to each RWQCB. The RWQCB may issue discharge permits under State law in

response to a report of waste discharge. These permits are commonly referred to as "waste discharge requirements" and are issued by the RWQCBs for activities within each regional board's jurisdiction.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package, comprised of AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), collectively known as the Sustainable Groundwater Management Act. The act provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for state intervention only if necessary, to protect the resource. The act requires the formation of local groundwater sustainability agencies that must assess conditions in their local water basins and adopt locally based management plans. The act provides a 20-year timeline for the groundwater sustainability agencies to implement the plans to achieve long-term groundwater sustainability. Further, the act protects existing surface water and groundwater rights and does not interfere with current drought response measures.

California Green Building Standards Code

In 2021, the State of California enacted the fourth revision of the California Green Building Standards Code (CALGreen Code) as part 11 of the California Building Standards Code (Title 24). CALGreen provides mandatory direction to developers of all new construction and renovations of residential and non-residential structures with regard to all aspects of design and construction, including but not limited to site drainage design, storm water management, and water use efficiency. Required measures are accompanied by a set of voluntary standards that are designed to encourage developers and cities to aim for a higher standard of development.

Under CALGreen, all residential and non-residential sites are required to be planned and developed to keep surface water from entering buildings and to incorporate efficient outdoor water use measures. Construction plans are required to show appropriate grading and surface water management methods such as swales, water collection and disposal systems, French drains, water retention gardens, and other water measures that keep surface water away from buildings and aid in groundwater recharge. Plans should also include outdoor water use plans that utilize weather- or soil moisture-controlled irrigation systems. Non-residential structures are also required to develop an irrigation water budget for landscapes greater than 2,500 square feet that conforms to a local water efficient landscape ordinance or to the state Model Water Efficient Landscape Ordinance, per Title 31, Green Building Standards Code, where no local ordinance is applicable.

Also, for construction activities that disturb less than one acre, a storm water soil loss prevention plan (also referred to as an erosion control plan) must be developed that prevents the pollution of storm water runoff (Section 4.106.2 and Section 5.106.2 of the 2021 California Green Building Standards Code). This can be achieved either through compliance with a storm water management and/or erosion control ordinance or implementation of best management practices (BMPs). The City has a storm water management ordinance, discussed below.

Construction General Permit

The NPDES program allows for the issuance of general permits that cover specific actions by multiple parties, such as construction activities. Dischargers covered under a general permit must comply with the permit terms and conditions. In 2009, the SWRCB issued the statewide Construction General Permit to regulate discharges or pollutants in storm water associated with

construction activities (NPDES No. CAR000002, Water Quality Order 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-006-DWQ). Dischargers are required to obtain coverage under the Construction General Permit if a project disturbs one or more acres of soil or disturbs less than one acre but is part of a larger common plan of development that in total disturbs one or more acres. The Construction General Permit requires that projects implement a Storm Water Pollution Prevention Plan (SWPPP) that includes specific BMPs and establishes numeric effluent limitations to meet water quality and technology-based standards.

Discharges of Groundwater to Surface Waters

The Los Angeles RWQCB Order R4-2003-0111 contains the waste discharge requirements for discharges of groundwater from construction and project dewatering to surface waters in the coastal watersheds of Los Angeles and Ventura Counties (General NPDES Permit No. CAG994004). This order regulates the discharge of groundwater that may or may not be impacted by toxic compounds and/or conventional pollutants. It requires that dewatering activities prevent water quality degradation and protect beneficial uses of receiving surface water bodies. The order also includes discharge limitations and discharge prohibitions, as well as Total Maximum Daily Loads (TMDLs) for receiving water bodies.

Regional

Water Quality Control Plan for the Los Angeles Region

The *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) seeks to preserve and enhance water quality and protect the beneficial uses of water bodies in the region (LARWQCB 1994). The Basin Plan provides quantitative and narrative criteria for a range of water quality constituents applicable to certain receiving water bodies and groundwater basins within the Los Angeles Region. The Basin Plan (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and to conform to the State's anti-degradation policy; and (3) describes implementation programs to protect all waters in the region. All applicable SWRCB and RWQCB plans and policies and other pertinent water quality policies and regulations are incorporated by reference into the Basin Plan.

Water quality objectives for ammonia, coliform bacteria, bioaccumulation, biochemical oxygen demand, biostimulatory substances, chemical constituents, total residual chlorine, color, exotic vegetation, floating material, methylene blue activated substances, mineral quality, nitrogen, oil and grease, dissolved oxygen, pesticides, pH, polychlorinated biphenyls, radioactive substances, suspended solids, taste and odor, temperature, toxicity, and turbidity are also included in the Basin Plan. Implementation of the Basin Plan occurs primarily through issuance of Waste Discharge Requirements, including regulatory enforcement action, as necessary. The existing, potential, or intermittent beneficial uses for the Alhambra Wash and the Arroyo Seco (Reach 1), where storm water runoff from the City is discharged and for the underlying groundwater basins in the City (Main San Gabriel Groundwater Basin), are summarized below in Table 3.9-1, Beneficial Uses of Receiving Waters. The beneficial uses defined in the Basin Plan identified for the receiving waters in the City include:

- ***Municipal and Domestic Supply (MUN):*** Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

- ***Industrial Service Supply (IND):*** Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well repressurization.
- ***Industrial Process Supply (PROC):*** Uses of water for industrial activities that depend primarily on water quality.
- ***Agricultural Supply(AGR):*** Uses of water for farming, horticulture, or ranching including, but not limited to, irrigating, stock watering, or supporting vegetation for range grazing.
- ***Groundwater Recharge (GWR):*** Uses of water for natural or artificial recharge of groundwater for future extraction, to maintain water quality, or to halt saltwater intrusion into freshwater aquifers.
- ***Warm Freshwater Habitat (WARM):*** Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife (including invertebrates).
- ***Wildlife Habitat (WILD):*** Uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
- ***Rare, Threatened, or Endangered Species (RARE):*** Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under State or federal law as rare, threatened, or endangered.

TABLE 3.9-1
BENEFICIAL USES OF RECEIVING WATERS

Water Body	Applicable Beneficial Uses							
	MUN	IND	PROC	AGR	GWR	WARM	WILD	RARE
Alhambra Wash	P*	—	—	—	I	P	P	E
Arroyo Seco (Reach 1)	P*	—	—	—	—	P	P	—
Main San Gabriel Groundwater Basin	E	E	E	E	—	—	—	—

MUN: Municipal and Domestic Supply; IND: Industrial Service Supply; PROC Industrial Process Supply; AGR: Agricultural Supply: GWR: Groundwater Recharge; WARM: Warm Freshwater Habitat; WILD: Wildlife Habitat; Rare: Rare, Threatened, or Endangered Species; E: Existing Beneficial Use; P: Potential Beneficial Use; I: Intermittent Beneficial Use

* Designated under State Water Quality Control Board Resolution No. 88-63 followed by Los Angeles RWQCB Resolution No. 89-03. Some designations may be considered for exemption at a later date.

Source: LARWQCB. 1994 (June). *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*.

Storm Water Permitting (Municipal Separate Storm Sewer System Permit)

In December 2012, the Los Angeles RWQCB reissued the "Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4" (Los Angeles County MS4 permit, MS4 permit) to the County of Los Angeles, 84 incorporated cities within Los Angeles County (including South Pasadena), and the Los Angeles County Flood Control District in accordance with the federal NPDES permit program and Waste Discharge Requirements (WDRs) under State law (CAS004001, Order No. R4-2012-0175) (MS4 Permit). The City of South Pasadena is a co-permittee to the County's MS4 permit. The City has developed

a Low Impact Development (LID) ordinance and Green Streets policies in accordance with Los Angeles RWQCB requirements under the MS4 permit to ensure storm water runoff meets the WDRs; these are discussed further below.

Groundwater Rights

Groundwater pumping in the groundwater basin underlying the City is regulated by the Main San Gabriel Basin Watermaster. As noted above, adjudication of the water rights of the Main San Gabriel Groundwater Basin was entered in 1973. The Basin Judgment does not restrict the quantity of water that parties may extract from the Basin. Rather, it provides a means for replacing all annual extractions in excess of a party's annual right to extract water with supplemental water. The Watermaster annually establishes an Operating Safe Yield for the Main Basin, which is then used to allocate its portion of the Operating Safe Yield to each party.

The City currently has a prescriptive pumping right of 1.80520 percent of the Basin's Operating Safe Yield. The Operating Safe Yield in the Basin has averaged about 150,000 af per year over the past five years (fiscal years 2015–2016 through 2019–2020) plus the surface water rights are fixed at about 10,500 af for a total of about 160,500 af of water rights. If the City pumps more water than the allowed amount, a Replacement Water Assessment is charged by the Watermaster that is used to purchase untreated imported water for replacement/recharge into the Basin (South Pasadena 2021).

City

Municipal Code

Chapter 23, Stormwater and Urban Runoff Pollution Control

Chapter 23 of the South Pasadena Municipal Code (SPMC) is defined as the "Storm Water and Urban Runoff Pollution Prevention Control Ordinance of the City of South Pasadena" and was enacted to ensure the City meets federal and State Clean Water Act requirements and complies with Los Angeles County MS4 permit requirements.

The purpose of this chapter is to protect and improve water quality of receiving waters by:

a) Reducing illicit discharges to the municipal storm water system to the maximum extent practicable;

b) Eliminating illicit connections to the municipal storm water system;

c) Eliminating spillage, dumping, and disposal of pollutant materials into the municipal storm water system;

d) Reducing pollutant loads in storm water and urban runoff from land uses and activities identified in the municipal NPDES permit; and

e) Reducing the contribution of pollutants from the MS4 through interagency coordination.

The intent of this chapter is to enhance and protect the water quality of the receiving waters of the United States in a manner that is consistent with the Clean Water Act and acts amendatory thereof or supplementary thereto; applicable implementing regulations, the MS4 permit and any amendment, revision, or reissuance thereof.

Section 23.12 et. seq. of the SPMC requires that for projects with construction activity subject to the Construction General Permit, proof of application for this permit would be required before the City issues a grading permit, and also requires that all records associated with coverage under the Construction General Permit be retained at the construction site. Section 23.13 et. seq. of the SPMC addresses construction activities not subject to the Construction General Permit (i.e., less than one acre of disturbance) but that would be subject to the MS4 requirements, which encompasses all anticipated development in the City. These projects would be required to comply with requirements contained in the MS4 permit, as specified in the City's watershed management program, defined in Section 23.14 et. seq. of the SPMC.

Section 23.14 et. seq. of the SPMC contains requirements for storm water pollution control measures in construction activities and facility operations of development and redevelopment projects to comply with the current MS4, lessen the water quality impacts of development by using smart growth practices, and integrate LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. LID, in simplest terms, consists of building and landscape features designed to retain or filter storm water runoff. The LID principles shall be inclusive of the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements under the MS4. This section authorizes the City to further define and adopt storm water pollution control measures, develop LID principles and requirements, including, but not limited to, the objectives and specifications for integration of LID strategies, and collect funds for projects.

Urban Water Management Plan

The City is a retail water supplier that serves the majority of the residents within South Pasadena. As its own water supplier, the City is required to prepare an Urban Water Management Plan (Plan) in accordance with the California Urban Water Management Planning Act (UWMP Act) which was established in 1983. The primary objective of the UWMP Act is to direct urban water suppliers to evaluate their existing water conservation efforts and, to the extent practicable, review and implement alternative and supplemental water conservation measures. Section 10621(a) of the California Water Code states, "Each water supplier shall update its plan at least once every five years on or before December 31, in years ending in five and zero."

The *2020 Urban Water Management Plan* (UWMP), dated October 2021, for the City of South Pasadena was prepared to meet the mandates of the California Urban Water Management Planning Act. The UWMP identifies historic and projected water supplies available to the City of South Pasadena; existing and projected water demand; available water rights; and programs to meet demand during an average year, single-dry year, and a five-consecutive-year drought. The UWMP is the foundational document for compliance with both the *California Water Code* and SB 610 and SB 221 documentation for applicable development projects in the City.

3.9.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse hydrology and water quality impact if it would:

Threshold 3.9a: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

Threshold 3.9b: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

Threshold 3.9c: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; or

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Threshold 3.9d: 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; or

Threshold 3.9e: Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

3.9.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.5 Promote integration of Green Infrastructure into storm water management systems.

A1.5a Prepare a citywide Green Infrastructure Framework.

A1.5b Adopt storm water regulations that are more supportive of green infrastructure.

A1.5c Establish programs to promote the use of captured rainwater, gray water, or recycled water.

A1.5d Establish protocols for the transition of conventional gray infrastructure to multi-functional natural system Green Infrastructure.

A1.5e Develop simple, small, and low-cost demonstration green infrastructure projects both in the public and private realm.

A1.5f Review and revise development regulations to establish a green approach in new developments. Minimize impervious areas. Develop new projects and retrofit existing surfaces to reduce runoff through infiltration.

A15g Incorporate Green Street elements into repaving projects on a citywide basis.

A1.5h Establish programs to promote the use of green roofs, bio-swales, pervious materials for hardscape, and other stormwater management practices to reduce water pollution.

A1.5i Establish design standards for the City rights-of way including street tree planting and design that incorporates filtration and water retention.

A1.5j Conduct demonstration and pilot projects, focusing on testing and developing green partnerships.

P3.12 Ensure continuity of critical services and ensure that adequate infrastructure is provided to accommodate new development by identifying capital improvements necessary to support long-term needs and responsibilities for funding and implementing improvements.

A3.12a Create a long-term plan to update infrastructure not only to accommodate growth, but also the effects of climate change.

A3.12c Create incentives and promote the installation of residential graywater systems that meet appropriate regulatory standards.

A3.12d Provide educational resources to encourage rainwater harvest.

A3.12e Implement provisions of the Water Management Plan requiring developers to pay for water, wastewater, and stormwater system upgrades beyond what is currently in place.

A3.12f Develop standards to increase the use of pervious pavers and other permeable materials on streets and in parking lots.

P8.3 Promote, expand, and protect green infrastructure that links the natural habitat.

A8.3a Prepare a citywide Green Infrastructure Framework.

A8.3b Implement simple, small, and low-cost demonstration green infrastructure projects both in the public and private realms.

A8.3c Expand the function of parks and open spaces beyond recreation, to store and clean water, filter air, help improve public health, and provide habitat and connectivity to increase biodiversity, in essence to become green infrastructure.

Downtown Specific Plan Update

P1.2 Promote and require the integration of Green Infrastructure into storm water management systems.

A1.2a Review and revise development regulations to encourage a green approach in new developments. Minimize impervious areas. Develop new projects and retrofit existing surfaces to reduce runoff through infiltration.

A1.2b Incorporate Green Street elements into the redesign of Mission Street and Fair Oaks Avenue.

A1.2c Promote the use of green roofs, bio-swales, pervious materials for hardscape, and other stormwater management practices to reduce water pollution.

A1.2d Promote the use of captured rainwater, grey water, or recycled water.

P3.7 Ensure continuity of critical services.

A3.7 Require developers to pay their fair share for water, wastewater, and stormwater system upgrades beyond what is currently in place to accommodate capacity needs created by growth.

2021–2029 Housing Element Implementation Programs

There are no Housing Element Implementation Programs goals or policies related to hydrology and water quality.

3.9.6 ENVIRONMENTAL IMPACTS

Threshold 3.9a: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

There are two major classes of pollutants: point source and non-point source. Point-source pollutants can be traced to their original source and are discharged directly from pipes or spills. Non-point-source pollutants cannot be traced to a specific original source. Non-point source pollution is caused by rainfall or snowmelt moving over and through the ground. Storm water runoff (i.e., non-point source) occurs when rainfall is collected by storm drains instead of being absorbed into groundcover or soil as is common in undeveloped and in landscaped areas. Common pollutants associated with storm water runoff in urban areas include sediment, nutrients, bacteria and viruses, oil and grease, metals, organics, oxygen-demanding substances, pesticides, and trash and debris. Wet- and dry-weather runoff typically contain similar pollutants of concern; however, after long dry periods between rainfall events, the concentrations of pollutants in dry weather flows are higher and potentially more harmful. Sediments and contaminants may be transported through runoff to downstream drainages and ultimately into the receiving waterways, and potentially even into the Pacific Ocean, thereby affecting surface water and offshore water quality without appropriate management. In the City of South Pasadena, the Los Angeles RWQCB administers NPDES permitting and is responsible for issuance of Waste Discharge Requirements (WDRs).

Construction

Storm water runoff from individual construction sites could contain pollutants such as soils and sediments that are released during grading and excavation activities and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Other common pollutants that may result from construction activities include solid or liquid chemical spills; concrete and related cutting or curing residues; wastes from paints, stains, sealants, solvents, detergents, glues, acids, lime, plaster, and cleaning agents; and heavy metals from equipment. Construction activities could include demolition of existing structures for new development or replacement, new development, road improvements and realignments, installation and realignment of utilities, and the potential replacement of utilities. Construction runoff would flow into the storm drain inlets in the City or in the surrounding area and would enter receiving water bodies. As discussed above, the City's receiving water (Arroyo Seco Reach 1 and Alhambra Wash) are considered impaired water bodies; pollutants in the storm water could add to further degradation of water quality and violation of TMDLs and affect the identified beneficial uses for these waters.

As discussed above, construction activities that disturb one or more acres of land are subject to the Construction General Permit (Order 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-006-DWQ). Compliance with the Construction General Permit would involve filing a Notice of Intent with the SWRCB, then preparing and submitting a SWPPP prior to construction activities. The SWPPP must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment discharge and erosion control measures, maintenance responsibilities, and non-storm water management controls. Inspection of construction sites before and after storms is required to identify storm water discharge from the construction activity and to identify and implement controls where necessary. As noted above, the City requires proof of application for coverage under the Construction General Permit and retention of all associated documents on the construction site, pursuant to Section 23.12 of the SPMC.

The preparation of a SWPPP requires the individual developer to implement best management practices (BMPs) that are designed specifically to address the potential pollution risks that would be incurred during project construction. The BMPs set forth in the SWPPP and implemented during construction activities that are most often used include (1) erosion-control BMPs such as hydraulic mulch, soil binders, and geotextiles and mats to stabilize soils; (2) temporary drainage swales to divert runoff from exposed soils; (3) sediment controls such as fiber rolls along disturbed areas, temporary desilting basins, and gravel bags around storm drain inlets; (4) watering of exposed soils and covering stockpiles of soil; (5) stabilization of construction entrance/exit points to reduce tracking of sediments on vehicles; and (6) timing of grading to avoid the rainy season (i.e., November through April). Effective implementation of the project-specific measures in the SWPPP would comply with the Construction General Permit requirements, and, therefore, would not violate applicable waste discharge requirements.

As discussed, for construction activities that disturb less than one acre, CALGreen requires a storm water soil loss prevention plan (also referred to as an erosion control plan) to be developed that prevents the pollution of storm water runoff, and this can be achieved by through compliance with the City's storm water management ordinance (Chapter 23 of the SPMC).

Therefore, all construction activities would be required to meet permitting requirements, at either the State or local level, to effectively control storm water runoff pollution control and ensure applicable waste discharge requirements, pursuant to the SPMC, are not violated, which would reduce short-term, construction-related water quality impacts to surface water and groundwater to a less than significant level, and no mitigation is required.

Operation

Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would have the potential to increase non-point-source runoff, and associated pollutants, from residential, office/retail, utility, and roadway uses. All proposed projects would be required to comply with applicable requirements of the Los Angeles County MS4 permit, implemented via the City's storm water management ordinance (Chapter 23 of the SPMC).

This includes preparation of a SUSMP, which must include a drainage concept and storm water quality plan that reduces peak storm water runoff discharge rates; conserves natural areas; minimizes storm water pollutants of concern; protects slopes and channels; provides storm drain system stenciling and signage; properly designs outdoor material storage areas and trash storage areas; and provides proof of ongoing BMP maintenance through structural or treatment-control BMPs. Section 23.14 et. seq. of the SPMC contains requirements for storm water pollution control measures for both construction and operation of development/redevelopment projects to comply with the current MS4 permit. These requirements lessen the water quality impacts of development by using smart growth practices and integrate LID design principles to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. The City's LID ordinance and Green Streets policies have been adopted in accordance with Los Angeles RWQCB requirements under the MS4 permit to ensure storm water runoff meets the WDRs.

Because most of the development that may occur pursuant to the Project would be redevelopment of existing, fully developed sites, buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in a minimal increase in impervious surfaces. Also, replacement of existing land uses through redevelopment

activities presents an opportunity to better control runoff through the implementation of current, mandated storm water management features.

Finally, the General Plan Update includes a green infrastructure concept. Green infrastructure refers to a network of green spaces that protects natural ecosystems and provides several interrelated benefits related to air and water quality, GHG emissions, flood control, wildlife habitat, and the economy. Green infrastructure is contrasted with traditional "gray" infrastructure, which is a disconnected series of drainage channels, detention areas, streets, and utility corridors that are designed, operated, and maintained separately. For the City, the core areas would include all open spaces, such as the Arroyo Seco watershed, parks, and other natural areas. The corridors would include the watershed area, streets, alleys, and utility easements that maintain connectivity between and among the core areas and corridors. This green infrastructure concept, if fully implemented, would reduce the volume of runoff flowing into the municipal storm drain system and downstream receiving waters, because infiltration would be increased. The pollutant load in storm water runoff would also be decreased by the capture and treatment of sediment and contaminants in the green infrastructure components.

Through compliance with State and local regulations by future development storm water runoff, impacts related to operational water quality standards and waste discharge requirements would be less than significant, and no mitigation is required.

Threshold 3.9b: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Groundwater Supplies

The City operates its own municipal water services, with water supplies from the underlying Main San Gabriel Groundwater Basins. The City obtains its groundwater supply through four wells, of which two are currently active.

Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would create a long-term demand for water to be used for domestic purposes, landscape irrigation, and maintenance activities. This water demand would lead to an increase in groundwater pumping from local wells. As discussed above, groundwater pumping is regulated by the Watermaster. As discussed in Section 3.14, Utilities and Services Systems, the City complies with its pumping rights and the need to replenish groundwater when the City exceeds its allocation. Thus, groundwater pumping that may lead to the depletion of local groundwater resources is not expected to occur. Continued management of the groundwater basins by the Watermaster would also prevent overdraft conditions or other adverse impacts to local groundwater. Therefore, implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not substantially deplete groundwater supplies. There would be a less than significant impact, and no mitigation is required.

Groundwater Recharge

The City is largely built out and has an established land use pattern, with limited available vacant or underutilized land throughout the City. Groundwater recharge is accomplished through the infiltration of storm water and irrigation water runoff into pervious soils, whether through an engineered spreading ground facility, through creeks and drainages, and/or through vacant and vegetated (including landscaped) areas. The construction of new impervious surfaces, including

roadways, building foundations, parking lots, and other concrete or asphalt surfaces, would prevent rainwater from infiltrating the soils, potentially reducing groundwater recharge.

As discussed above, because virtually all the development that may occur pursuant to the Project would be redevelopment of existing, fully developed sites, buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in a minimal increase in impervious surfaces. The vacant parcels available for development, including in the focus areas, occupy less than one percent of the City's land area (Inloes 2018). Also, not all vacant parcels are necessarily pervious. The development of this very small increment of land area would not result in the creation of substantial interference to groundwater recharge. There are no groundwater recharge facilities within the City, and existing parks and open space areas would not be altered as a result of the Project. Therefore, implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not interfere substantially with groundwater recharge. There would be a less than significant impact, and no mitigation is required.

Threshold 3.9c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

Changes in drainage patterns would be confined to individual development sites and would not affect major underground storm drain lines and concrete-lined drainages in the City. As discussed above, most development sites pursuant to the proposed Project would be redevelopment of existing, fully developed sites, the change in drainage patterns on these sites would be nominal. All development must be conducted in compliance with applicable State and local regulations, which prevent substantial alteration of site drainage patterns by controlling the volume and direction of runoff. Since drainages in the City are concrete-lined, no alteration in the course of these channels would occur from future development. Impacts would be less than significant, and no mitigation is required.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; or

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The construction of new impervious surfaces would reduce the amount of rainwater that could infiltrate the soils, potentially increasing storm water runoff due to reductions in infiltration. This would occur primarily through the introduction of new structures, driveways, parking lots, walkways, and other site improvements on vacant properties. As previously discussed, the City is largely built out and has an established land use pattern, with limited available vacant or underutilized land throughout the City. Less than one percent of the land available for development within the City is vacant, and not all vacant sites are necessarily pervious. Therefore, development pursuant to the General Plan and DTSP & 2021–2029 Housing Element Implementation Programs Update would not appreciably increase the amount of impervious surface areas in the City. Further, the City's storm water management requirements (Section 23.14) state that projects shall be designed to control pollutants, pollutant loads, and runoff

volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use (i.e., LID features).

Therefore, due to the nominal potential for increased runoff volumes and the City's storm water management requirements, there would be less than significant impacts related to alternating the drainage pattern, substantially increasing surface water runoff, or the capacity of the municipal storm drain system, and no mitigation is required.

Threshold 3.9d: In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The City of South Pasadena is not located within the 100-year flood hazard area, as mapped by FEMA (FEMA 2023). Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, including housing or other structures, would not be exposed to flood hazards. Structures that would be built as part of future development would not impede or redirect flood flows. Impacts would be less than significant, and no mitigation is required.

A seiche is the formation of large waves in landlocked bodies of water due to seismic activity. In the event of an earthquake, a seiche can occur and potentially cause major flooding and water inundation damage. There are no large open water bodies in or near the City that could be susceptible to seiche. There would be no impacts.

Tsunami (sea waves) hazards do not affect the City due to the City's elevation and distance from the ocean. The City is located outside the tsunami inundation areas in the Los Angeles County Tsunami Inundation Maps prepared by the California Department of Conservation (CGS 2021). There would be no impacts.

Mudflows are fluid masses of rock, earth, and other debris saturated with water and with the consistency of wet cement. They develop when water rapidly accumulates in the ground, such as during heavy rainfall or rapid snowmelt, changing the earth into a flowing river or slurry of mud. Mountainous areas are susceptible to mudflows. The foothills of the San Gabriel Mountains are located approximately five miles to the north-northwest. As such, there is no mudflow hazard from this area. Most of the City is relatively flat, with steeper hillside areas primarily in the southwest portion of the City.

As discussed above, portions of the City within and adjacent to the Lower Arroyo Seco are within the mapped inundation area for a failure of Devil's Gate Dam. The Project would not result in a release of pollutants in the event of such an inundation as there is no proposed change in land use designations in the portions of the City in the inundation zone. There would be no impact.

As discussed in Section 3.5, Geology and Soils, of this PEIR, development in hillside areas (sites within an average slope of 20 percent or greater) requires a Hillside Development Permit as a discretionary zoning approval of the City. Future development or redevelopment within the areas subject to a Hillside Development Permit, largely in the southwest portion of the City, would also be required to prepare site-specific geotechnical investigations that include analysis of slope stability, erosion, subsidence, groundwater effects, and earthquakes as it pertains to the site's unique topography, to identify these hazards and provide appropriate construction recommendations, as necessary. Compliance with erosion-control measures required for a Hillside Development Permit would reduce the potential for mudflow from development sites with

steep slopes. Therefore, mudflow hazards in the City would be less than significant levels, and no mitigation is required.

Threshold 3.9e: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed under Threshold 3.9(a) above, implementation of the Project would not adversely affect water quality through compliance with the Construction General Permit, CALGreen, and the SPMC during construction and City LID and County MS4 permit requirements during operation.

The San Gabriel Basin, the City's source of groundwater, is defined by the California Department of Water Resources as very low priority pursuant to the 2014 Sustainable Groundwater Management Act (DWR 2023). As such, there is currently no sustainable groundwater management plan applicable to the City. Regardless, as discussed under Threshold 3.9(b) above, the increase in demand for potable water associated with buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs is not expected to result in depletion of local groundwater resources because the Main San Gabriel Basin is managed by the Watermaster. Continued management of the groundwater basins by the Watermaster would also prevent overdraft conditions or other adverse impacts to local groundwater. Therefore, implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not obstruct implementation of groundwater management of the Basin. There would be a less than significant impact, and no mitigation is required.

3.9.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Water Quality

Cumulative water quality impacts are considered for the Los Angeles River Watershed, where the City of South Pasadena is located. Future development within the Los Angeles River Watershed, which includes the majority of Los Angeles County, would generate new sources for urban pollutants, which could impact water quality. However, construction activities throughout Los Angeles County are required to conduct all construction activities on one acre or more in compliance with the NPDES Construction General Permit, which would prevent short-term construction activities from resulting in significant water quality impacts; and construction activities on less than one acre in compliance with CALGreen.

Cities in the County have adopted programs for long-term storm water pollution mitigation through the requirement for SUSMPs for individual developments. Waste Discharge Requirements, defined by the Los Angeles RWQCB, also impose guidelines for individual developments that may lead to discharges into the storm drain system or surface water bodies. These regulations implement the Basin Plan for the Los Angeles region and help meet the established water quality objectives for both groundwater and surface water bodies.

Also, the Los Angeles River has an 824-square-mile watershed. Runoff originating within the City (3.4 square miles) represents a minor portion (0.4 percent) of the total runoff volume when compared to the water volumes handled by the Los Angeles River as a whole. Runoff from future

development activity would be a minor amount of the total runoff from the City. Therefore, no cumulative adverse impacts related to water quality would occur.

Groundwater

Cumulative groundwater impacts are considered for the Main San Gabriel Groundwater Basin, from which the City provides the majority of its water supply. Increases in the resident population and intensity of development would translate to a greater demand for water and increased pumping of the groundwater basins, as well as greater use of imported water sources. Individual developments would coordinate with their respective water service providers to allow them to provide water service in a timely and adequate manner. The water service provider's groundwater supplies are controlled by the Main San Gabriel Basin Watermaster, who is responsible for monitoring groundwater levels and water quality, including the operating safe yields of the basin and extraction limits and amounts. Continued management of the groundwater basin would prevent overdraft conditions, water quality problems, and other impacts on groundwater resources. Therefore, no cumulative impacts related to groundwater recharge or supplies would occur.

Hydrology and Drainage

Cumulative water quality impacts are considered for the Los Angeles River Watershed. Future growth and development within the watershed would increase impermeable surfaces and decrease water percolation areas. Increase in impervious surfaces would increase storm water volumes and flow rates in local and regional drainage channels. However, all development within Los Angeles County is subject to development in compliance with SUSMP and local municipal code standards for reducing storm drain capacity impacts. Storm drain infrastructure is incrementally improved with project-specific design plans that are subject to the review and approval of local jurisdiction. Project-specific design and utility improvements would prevent negative impacts to regional drainage channel capacity. Therefore, no cumulative impacts related to changes in drainage patterns or inadequate storm drainage would occur.

Inundation

Cumulative inundation impacts are considered for the San Gabriel Valley. Several dams at the foothills of the San Gabriel Mountains pose inundation hazards to development across the San Gabriel Valley in the event of dam failure. Failure of any dam could affect existing and future developments within identified inundation areas. The potential for property damage that may risk release of pollutants is reduced by the construction of dams in accordance with State and federal dam safety regulations and the preparation of emergency action plans for individual dams, which include warning, evacuation, and post-disaster actions. As noted above, the Project would not introduce a new risk of pollutant release due to dam inundation. Therefore, no cumulative impacts related to dam inundation would occur.

Seiche hazards would affect local areas downstream of a water body or reservoir and would not create cumulative impacts. The hazards associated with a tsunami are confined to the shoreline and coastal areas of Los Angeles County; the San Gabriel Valley is not susceptible to tsunami. Future development on steep hillside areas throughout the San Gabriel Valley may be exposed to potential mudflow hazards. The debris basins that have been constructed by the Los Angeles County Department of Public Works at the foothills of the San Gabriel Mountains are expected to reduce storm water flows and debris volumes, preventing mudflow hazards. Therefore, no cumulative impacts related to water retention facilities would occur.

3.9.8 MITIGATION MEASURES

No significant adverse impacts related to hydrology and water quality have been identified with implementation of relevant policies and actions in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. Therefore, no mitigation is required.

3.9.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative level.

3.9.10 REFERENCES

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3.10 LAND USE AND PLANNING

3.10.1 METHODOLOGY

This section describes the existing land uses in the City and discusses the currently adopted General Plan and Mission Street Specific Plan (MSSP). It also discusses the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project), proposed changes in land uses with Project implementation, and consistency with regional plans and policies.

Land use impacts can be direct or indirect. Direct impacts result from land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, such as habitat conservation plans. This section of the Program Environmental Impact Report (PEIR) focuses on direct land use impacts. Indirect land use impacts are secondary effects that may arise from land use policy implementation, such as an increased demand for public services and utilities, or increased traffic. Indirect impacts related to other environmental topics are addressed in the other topical sections in this PEIR.

3.10.2 EXISTING CONDITIONS

Existing Land Uses

The City of South Pasadena covers approximately 3.4 square miles, or 2,187 acres. Existing land use types in the City are shown in Exhibit 2-2, Existing Land Use Policy Map, Section 2.0, Environmental Setting and Project Description, of this PEIR.

The City's development character is predominantly low- and mid-rise residential, with low- to mid-rise neighborhood-serving retail uses, office buildings, and civic uses generally located along its main corridors: Mission Street, Fair Oaks Avenue, Huntington Drive, Fremont Avenue, and Monterey Road. Residential uses cover approximately 63.4 percent (1,386.3 acres) of the City's land area. Commercial uses cover approximately 3.0 percent (64.8 acres) of the City's land area, office uses cover 0.8 percent (16.9 acres), and light industrial uses cover 0.6 percent (12.2 acres). Community facilities cover 3.9 percent of the City (85.0 acres). The MSSP area, parks and other open space, utility easements, and rights-of-way cover 32.3 percent of the City (707 acres).

The City of South Pasadena has an estimated 11,156 dwelling units, comprised of nearly equal amount of single- and multi-family units. The vast majority of housing units in the City were built prior to 1980, including a number of officially and unofficially designated historic structures. However, from 1980 to 1990 was the most significant decade of multi-family housing development in the City. Regardless, the City has added only 839 net new dwelling units in the last approximately 40 years (South Pasadena 2021.) Retail uses in the City are generally small-scale and neighborhood-oriented. Retail development over the past decade has been predominantly ground-floor space within transit-oriented mixed-use buildings with multi-family units on the floors above, primarily on or near Mission Street and close to the Metro A Line station. The City has a small share of the office space within the Pasadena/Arcadia/Monrovia submarket; however, the City contains a disproportionate share of creative office space[1] within its submarket, which is primarily located in the Ostrich Farm District (refer to Exhibit 2-6 in Section 2.0) (HR&A 2017).

[1] Creative office space typically refers to space that falls outside the traditional layout (such as cubicles and perimeter offices). This type of office space generally has more open, flexible-use space, and is intended to

3.10.3 RELEVANT PROGRAMS AND REGULATIONS

State

It is noted that the California legislature continues to consider, and is expected to pass, additional regulations that could affect housing requirements and/or development mandates. Pending legislation is not analyzed in this PEIR. The State regulations below are those already passed that are most relevant to the environmental analysis of the Project.

Land Use Planning Law

The requirements and authority for local municipalities (i.e., counties and cities) in California to prepare and administer general plans are contained in Sections 65300 et. seq. of the *California Government Code.* A general plan is a regulatory document established by a city or county to provide a guide for the future physical, economic, social, and environmental well-being of the city or county. It generally consists of goals, policies, actions and/or programs that would achieve the community's vision for its future. For cities, the general plan guides the development of the incorporated city, plus any land outside city boundaries that has a relationship to the city's planning activities. This area outside a city's boundaries is called the Sphere of Influence. The City of South Pasadena does not have a sphere of influence; its jurisdictional boundaries align with the City limits.

The housing element is one of the State-mandated elements of a general plan. It identifies the City's housing conditions, needs, and opportunities; and establishes the programs that are the foundation of each municipalities housing strategy. However, unlike all other general plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). The City's 2013–2021 Housing Element is in effect through 2021. State law required City Council adoption of the 2021–2029 Housing Element by October 15, 2021, with a 120-day grace period (i.e., February 15, 2022) after which cities and counties face statutory penalties. Additionally, if a city cannot identify sufficient sites adequate to accommodate its RHNA allocation, the Housing Element must commit to rezone properties within three years to allow "by right" development of 20 percent below market rate projects. Assembly Bill (AB) 398 also requires a locality that fails to adopt an HCD-compliant housing element within 120 days of the statutory deadline to complete this required rezoning no later than one year from the housing element adoption deadline. Also, AB 398 prohibits the Housing Element from being found in substantial compliance until that rezoning is completed. AB 215 requires local agencies to make draft revisions of the housing element available for public comment for 30 days. The agency (i.e., City of South Pasadena) must consider and incorporate public comments prior to submission to the HCD for review. Because of legal action against the City related to its Housing Element preparation, the City is the subject of a Court Order[2] to bring its Housing Element into compliance with Government Code Section 65754 within the timeframe stated within the Court Order. This Court Order supersedes the time limits discussed above. Legislation related to housing element content, rather than processing, is discussed further below.

The requirements for preparation and implementation of specific plans are contained in Sections 65450–65457 of the *California Government Code.* Specific plans are a tool for the systematic implementation of a general plan and establish a link between implementing policies of the

encourage creativity and collaboration. Often utilized by creative/design businesses, such as architecture, advertising, and production.

2 Settlement Agreement *(Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

general plan and the individual development proposals in a defined area. The provisions of Section 65450 et. seq. of the *California Government Code* require that a specific plan be consistent with the adopted general plan of the jurisdiction within which it is located. In turn, all development, all public works projects, and zoning regulations must be consistent with the specific plan. The requirements for the adoption and administration of zoning laws, ordinances, and other regulations by counties and cities is contained in Sections 65800–65912 of the *California Government Code.*

Additionally, on September 30, 2008, AB 1358, the California Complete Streets Act was signed into law and became effective on January 1, 2011. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of a general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks.

Assembly Bill 1233

Assembly Bill 1233, approved by the Governor in 2005, requires that housing elements analyze vacant sites, sites having potential for redevelopment, and the relationship of zoning, facilities, and services to these sites. AB 1233 requires that housing elements specify action programs that will be taken to make sites available during the 6th Cycle Housing Element planning period (2021-2029), as necessary to accommodate the Regional Housing Needs Assessment (RHNA) units assigned to each municipality, plus any additional actions that are necessary to make sites available to accommodate any RHNA units that were assigned during the 5th Cycle Housing Element (2013–2021) that were not accommodated.

If a jurisdiction fails to implement programs in its housing element to identify adequate sites or fails to adopt an adequate housing element, AB 1233 requires local governments to zone or rezone adequate sites by the first year of the new planning period. Specifically, AB 1233 applies to local governments that:

- Failed to adopt an updated Housing Element for the prior planning period;
- Adopted a Housing Element that the HCD found out of compliance due to failure to substantially comply with the adequate sites requirement;
- Failed to implement the adequate sites programs to make sites available within the planning period; or
- Failed to identify or make available adequate sites to accommodate a portion of the regional housing need.

The City of South Pasadena has reutilized rezoning and other strategies to identify adequate sites to meet the 6th Cycle RHNA allocation. Additionally, the housing units allocated for the City in the 5th Cycle Housing Element planning period (i.e., 63 du) were accommodated in the City's 2014–2021 Housing Element.

Senate Bill 375

Senate Bill (SB) 375, approved by the Governor in 2008, aligns land use and transportation planning to drive development towards transit-accessible places and reduce car dependency. SB 375 is the land use component of California's wider strategy to reduce greenhouse gas (GHG) emissions, codified by the 2006 Global Warming Solutions Act (Assembly Bill [AB] 32).

SB 375 also requires that housing elements identify the existing and projected housing needs of all economic segments of the community. In certain cases, the State requires rezoning actions to be included within the housing elements to accommodate 100 percent of the need for very low and low-income households. If a jurisdiction does not fulfill the housing element action programs that are tied to affordability levels (prior to the June 30, 2020, deadline for the 5th Cycle production period), then penalties may be incurred in accordance with SB 375 and AB 1233 (discussed above).

Housing Legislation

The California legislature has passed numerous bills related to housing in the last several years. The following discussion briefly describes housing laws applicable to the City's planning documents and policies and those that may affect future City decision-making. It is anticipated that further legislation will be passed in coming years in light of the continuing housing shortage in the State.

Assembly Bill 1397

AB 1397 made several changes to housing element law by revising what could be included in a municipality's inventory of land suitable for residential development. AB 1397 changed the definition of land suitable for residential development to increase the number of multi-family sites. Identified sites must be "available" and "suitable" for residential development and have a "realistic and demonstrated potential" for redevelopment during the planning period. In addition, AB 1397 requires housing element inventory sites to be 0.5 acre to 10 acres, have sufficient infrastructure, or to be included in a program to provide such infrastructure, to support and be accessible for housing development. Further, the municipality must specify the realistic unit count for each site and whether it can accommodate housing at various income levels.

If a community does not have enough sites to accommodate its housing need, it must adopt a program to make adequate sites available, including a program for rezoning sites to provide lower-income housing. Pre-SB 375 housing law, cities asserted they were only required to identify actions that would be undertaken to make sites available to accommodate various housing needs-that they were not mandated to adopt the rezoning included in the Housing Element programs. However, SB 375 provides that communities preparing an eight-year housing element must complete all required rezoning if the available housing sites inventory does not identify adequate sites to accommodate the RHNA allocation. The planned rezoning must include "minimum density and development standards" for all sites, and, for sites designated for very low and low-income housing, rezoning must provide for "by right" zoning at certain minimum densities, with no discretionary approvals allowed except design review and subdivision map approval. In these instances, CEQA review cannot be required unless a subdivision map is needed. Additionally, the programmed rezoning must be completed within certain time frames.

Housing Crisis Act of 2019 (Senate Bill 330) and Senate Bill 8

The California Housing Crisis Act (HCA, SB 330) was enacted by Governor Newson in 2019 to combat the State's growing housing crisis. This legislation's goal is to increase California's affordable housing stock by 3.5 million new units by 2025. To streamline residential development, a new preliminary development application process is required, which includes a staff-level review of basic information regarding a project such as:

- Site characteristics;

- The planned project;
- Certain environmental concerns;
- Facts related to any potential density bonus;
- Certain coastal zone-specific concerns;
- The number of units to be demolished; and
- The location of recorded public easements.

SB 330 further streamlines housing development by reducing the number of public meetings or hearings to five or less (e.g., workshops, design review board meetings, planning commission meetings, advisory committee meetings, and city council meetings). A shortened approval time of 90 days instead of 120 days from the time of certification for an EIR is also required to streamline the development approval process.

Local agencies are no longer able to remove or modify land use designations or allowances to inhibit the development of housing, unless the local agency replaces the lost housing potential; therefore, ensuring no net loss in housing availability. Further, local agencies will no longer be able to limit the annual number of housing-focused land use approvals, create caps on the amount of constructed housing units, or limit the population size of their city. Subjective design limitations on parcels where housing is an allowable use is also no longer permissible for projects that are subject to processing per SB 330 (any housing project).

SB 8 extends until 2034 the HCA provision that prohibits cities from conducting more than five hearings on an application as well as HCA provisions that provide vesting rights for housing projects that submit a qualifying "preliminary application." Applicants who submit qualifying preliminary applications for housing developments prior to January 1, 2030, can now invoke vesting rights until January 1, 2034. SB 8 extends until 2030 provisions that limit localities' authority to impose shifting requirements as part of application "completeness" review, as well as provisions that require localities to render any decision about whether a site is historic at the time the application for the housing development project is deemed complete. SB 8 also enacts a series of reforms intended to provide that HCA provisions apply to both discretionary and ministerial approvals as well as to the construction of a single dwelling unit and makes a series of revisions to the already complex replacement housing and relocation requirements.

Assembly Bill 345

AB 345 further facilitates ADUs by removing, in certain circumstances, the requirement for a local agency to first pass an ordinance allowing the conveyance of an ADU separately from a primary residence (which can be an extended process) before such conveyance occurs and permits an ADU to be sold or conveyed separately from the primary residence to a qualified buyer (low- and moderate-income individuals and families as defined in California Health and Safety Code Section 50093) and if certain conditions are met, including that the primary residence or ADU was built by a qualified nonprofit corporation and that the property is held pursuant to a recorded tenancy in common agreement.

Assembly Bill 491

AB 491 requires that, for any residential structure with five or more residential dwelling units that include both affordable housing units and market-rate housing units, the BMR units must provide the same access to common entrances, areas, and amenities as non-BMR units, and the building

"shall not isolate the affordable housing units within that structure to a specific floor or an area on a specific floor."

Assembly Bill 787

AB 787 expands existing law that permits jurisdictions to claim credit for up to 25 percent of their RHNA from the conversion of existing housing units for very low- and low-income households by also permitting cities and counties to satisfy up to 25 percent of the local agency's moderate-income regional housing need through RHNA by permitting the conversion of units in an existing multifamily building to be restricted for moderate-income households. To qualify, the conversion 1) must occur beginning January 1, 2022; 2) units may not be previously affordable to very low-, low-, or moderate-income households; 3) must be subject to a 55-year recorded agreement; and 4) the initial post-conversion rent for the unit must be at least 10 percent less than the average monthly rent charged during the 12 months prior to conversion.

State Density Bonus Law and Related Legislation

California's Density Bonus Law (Section 65915 et. seq. of the Government Code) grants bonuses, concessions, waivers, and parking reductions to projects with qualifying affordable housing. The State's Density Bonus Law continues to be the most commonly used tool to increase housing density and production. Prior to the passage of Assembly Bill (AB) 1763, projects qualifying for a density bonus were entitled to between one and three "incentives" or "concessions" to help make the development of affordable and senior housing more economically feasible, such as reduced setback and minimum square footage requirements as requested by the developer. Projects may also be entitled to waivers of development standards if the standard has the effect of physically precluding the construction of a density bonus project at the allowed density or with the incentives / concessions to which the project is entitled.

AB 1763 provides a fourth incentive and concession to 100 percent affordable projects. If the project is located within a half mile of a major transit stop, AB 1763 goes even further by eliminating all local government limits on density and allowing a height increase of up to 3 stories or 33 feet.

The Density Bonus Law was further amended by SB 1227, which provided density bonuses for projects that included student housing, and SB 290 adds the ability to request one concession or incentive for projects that include at least 20 percent of the total units for lower-income students in a student housing development. In connection with for-sale density bonus units that qualified a developer for an award of a density bonus under the Density Bonus Law, SB 728 requires that such unit be either 1) initially occupied by a person or family of the required income, offered at an affordable housing cost and subject to an equity sharing agreement, or 2) purchased by a qualified nonprofit housing organization receiving a property tax welfare exemption.

AB 571 prohibits agencies from imposing affordable housing impact fees, including inclusionary zoning fees and in lieu fees, on affordable units proposed as part of a Density Bonus Law project.

The floor area ratio (FAR) is a common mechanism in local zoning codes that limits the total floor area of a building in relation to the square footage of a lot. SB 478 prohibits agencies from imposing a FAR of less than 1.0 for a housing development project (comprised solely of residential units, a mixed-use development with at least two-thirds of the square footage attributed to residential uses or transitional or supportive housing) consisting of three to seven units and a FAR of less than 1.25 for housing development project consisting of eight to 10 units. Additionally, an agency may not deny a housing development project located on an existing legal parcel solely on

the basis that the lot area does not meet the agency's requirement for minimum lot size. To qualify, a project must consist of 3 to 10 units in a multifamily residential zone or mixed-use zone in an urbanized area and cannot be within a single-family zone or within a historic district.

Covenants, Conditions, and Restrictions Legislation

AB 721 makes recorded covenants that limit residential development unenforceable against qualifying affordable housing developments. The law builds on existing law that allows parties to eliminate unenforceable racially restrictive covenants from recorded documents–but goes further by making any recorded covenants, conditions, and restrictions (CC&Rs) that restrict the number, size, or location of residences that may be built on a property, or that restrict the number of persons or families who may reside on a property, unenforceable against the owner of a 100 percent below market rate housing development that is affordable to lower-income households. There are exceptions for certain conservation easements and covenants required to comply with State or federal law.

AB 1584, a housing omnibus bill, establishes a restriction on contractual development controls that mirrors AB 721 by declaring unenforceable any CC&R contained within a deed, contract, security instrument, or other instrument that prohibits, effectively prohibits, or restricts the construction or use of an ADU on a lot zoned for single-family use.

Existing law notifies a buyer of real property that recorded covenants on the property may contain racially restrictive or other unenforceable discriminatory provisions and informs buyers of their right to file a Restrictive Covenant Modification (RCM) form. AB 1466 aims to hasten the removal of these covenants by requiring all county recorders throughout the State to establish a program to identify and redact unlawfully restrictive covenants and easing restrictions on the ability of other parties to seek to remove such covenants.

SB 9 provides for the ministerial approval of converting existing homes occupied by a homeowner into a duplex if certain eligibility restrictions are satisfied. It also allows a single-family home lot to be split into two lots, and a duplex to be built on each lot, provided that the initial home is occupied by an owner who attests that the owner will continue to live in a unit on the property as their primary residence for at least three years. The most notable exceptions to duplex and lot split by right approvals are 1) the property could not have been used as a rental for the past three years, 2) the property cannot already have an accessory dwelling unit or junior ADU, 3) the new lot may not be less than 40 percent of the property and must be at least 1,200 square feet, 4) modifications to the existing home may not require the demolition of more than 25 percent of an exterior wall, and 5) neither the new duplex nor the lot split with up to four new units (a duplex on each) may not result in a significant adverse impact to the physical environment.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties, an area that encompasses more than 38,000 square miles. As the designated MPO, the federal government mandates that SCAG research and draw up plans for transportation, growth management, hazardous waste management, and air quality. Among the leading activities SCAG undertakes are the following:

- Maintaining a continuous, comprehensive, and coordinated planning process resulting in a Regional Transportation Plan (RTP) and a Federal Transportation Improvement Program (FTIP);
- Developing a Sustainable Communities Strategy (SCS) to reduce greenhouse gas emissions as required by applicable State law (SB 375) as an element of the RTP;
- Developing demographic projections;
- Developing integrated land use, housing, employment, transportation programs, and strategies for South Coast Air Quality Management District (SCAQMD) planning purposes;
- Serving as co-lead agency for air quality planning in the Central Coast and Southeast Desert air basin districts;
- Developing and ensuring that the RTP and the FTIP conform to the purposes of the State Implementation Plans for specific transportation-related criteria pollutants, per the Clean Air Act;
- Serving as authorized regional agency for intergovernmental review of proposed programs for federal financial assistance and direct development activities;
- Reviewing environmental impact reports for projects having regional significance to ensure they are in line with approved regional plans;
- Developing an area-wide, waste treatment management plan;
- Preparing the RHNA for review and approval by the State, including planning for future population, housing, and employment growth throughout the SCAG region; and
- Preparing the Southern California Hazardous Waste Management Plan with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council.

SCAG's 2020–2045 RTP/SCS and current RHNA allocation are discussed further below.

Regional Transportation Plan/Sustainable Communities Strategy

The RTP is a long-range transportation plan that is developed and updated by SCAG every four years to guide transportation investments throughout the region. The SCS is a required element of the RTP that integrates land use and transportation strategies to achieve California Air Resources Board emissions reduction targets pursuant to Senate Bill SB 375.

On September 3, 2020, the SCAG Regional Council adopted the 2020–2045 RTP/SCS (RTC/SCS; also referred to as Connect SoCal) and the addendum to the *Connect SoCal Program Environmental Impact Report*. The 2020–2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020).

High-Quality Transit Areas

With adoption of the former 2012 RTP/SCS, the areas formerly known as 2% Strategy Opportunity Areas were replaced with what are now referred to as High-Quality Transit Areas (HQTAs). HQTAs are areas within one-half mile of a fixed guideway transit stop or a bus transit corridor

where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. Most of the City is within an HQTA identified in the 2020–2045 RTP/SCS; the portions not within an HQTA include much of the Monterey Hills in the southwest corner of the City and small polygons at the northern and northeastern City boundary.

Transit Priority Areas

SCAG defines a Transit Priority Area (TPA) as an area within one-half mile of a major transit stop that is existing or planned (SCAG 2020). The one-half mile radius around Metro's A Line Station at the Mission Street and Meridian Avenue intersection and the one-half mile radius around the fixed bus stop at the Huntington Drive-Garfield Avenue-Atlantic Boulevard/Los Robles Avenue intersection are identified as TPAs in the 2020–2045 RTP/SCS. Exhibit 3.10-1, HQTA and TPA in South Pasadena, illustrates the geographic coverage of each of these two SCAG-defined areas within the City.

Regional Housing Needs Assessment

Housing needs are determined by the California Housing and Community Development Department (HCD), which allocates numerical housing targets to the MPOs, including SCAG, through the RHNA process. The RHNA identifies the existing and projected housing needs of each municipality (city and county) within the SCAG region. Based on SCAG's 2020 RHNA, approved by HCD on March 22, 2021, the City's proposed 2021–2029 Housing Element Implementation Programs have a need for 2,067 new units to be provided, distributed across the four income levels established by HCD, including the following:

- Very Low Income (757),
- Low Income (398),
- Moderate Income (334), and
- Above Moderate Income (578) (SCAG 2021).

The above-moderate income units are considered market rate, while units for the remaining income levels are considered below market rate at a range of affordability levels. The current RHNA allocation of 2,067 units is almost 33 times higher than the last cycle (63 units). Additionally, the California Department of Housing and Community Development (HCD) has recommended required the 2021–2029 Housing Element Implementation Programs demonstrate capacity for a surplus of units beyond the RHNA allocation. The surplus would be 708 DUs for a total of 2,775 DUs.

Cities and counties are not responsible for building the number of units specified in the RHNA, but rather are required to plan for them, by demonstrating the sufficiency of current land use and development standards and identifying specific housing element programs to provide capacity to accommodate the RHNA with implementation dates within three years. A municipality's housing element will not be certified by HCD if it does not demonstrate standards and programs for housing production capacity to accommodate the RHNA including rezoning, if necessary. Penalties, including fines and loss of local discretion, can be levied against cities and counties that fail to implement the housing element programs that are included to reach the required housing production capacity. Per State requirements, the City's recently adopted Housing Element Update Implementation Programs include the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics;

- An analysis of the barriers to producing and preserving housing;
- A review of the City's progress in implementing current housing policies and programs;
- An identification of goals, policies, and actions in addition to a full list of programs that will implement the vision of the Housing Element Implementation Programs; and
- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

South Coast Air Quality Management District

The SCAQMD prepares an Air Quality Management Plan (AQMP) every four years to address State and federal ambient air quality standards within the South Coast Air Basin. The 2022 AQMP is the current management plan, and consistency with this plan is addressed in Section 3.2, Air Quality, of this PEIR.

City

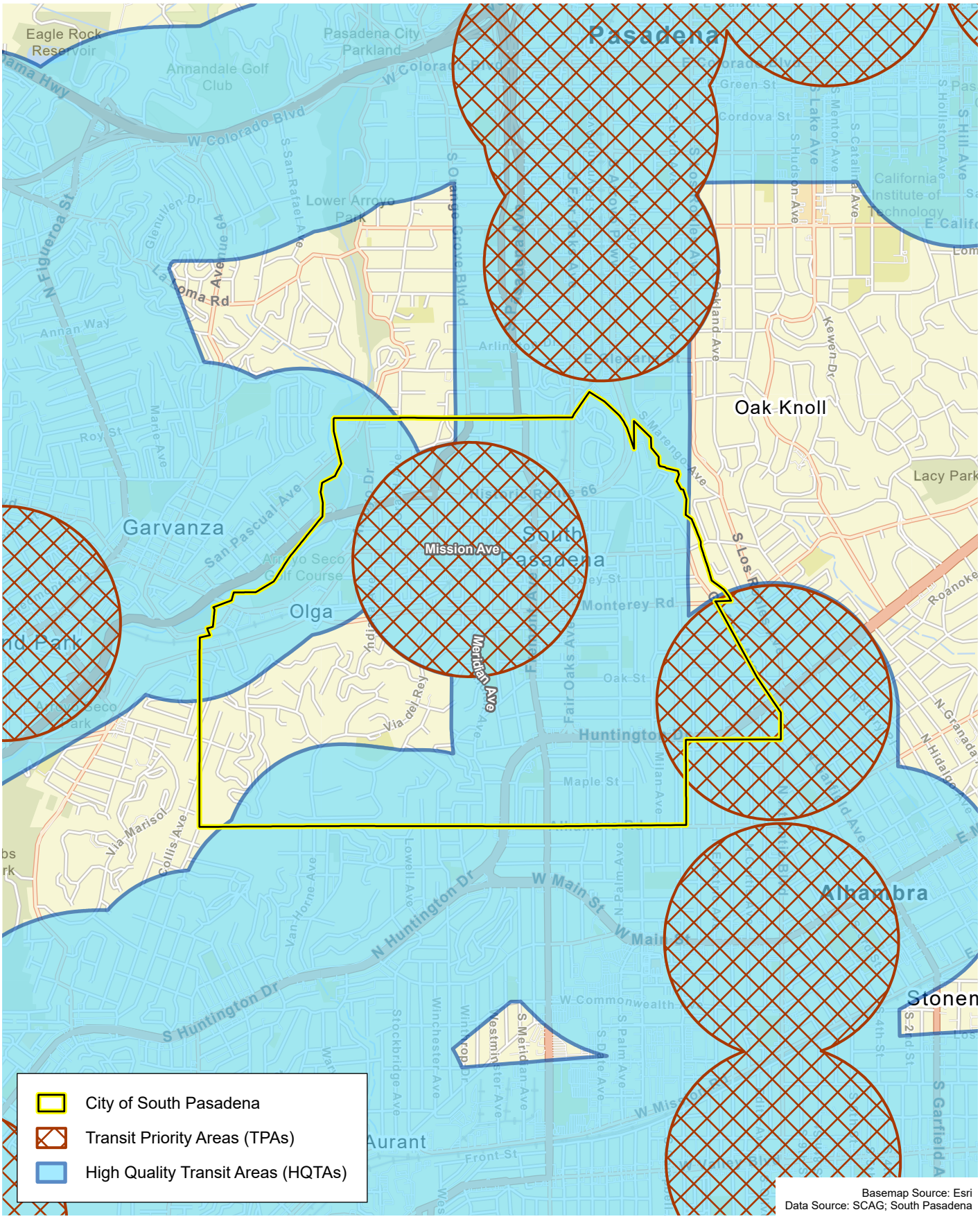
Existing General Plan and Housing Element

The current *South Pasadena General Plan* (General Plan) was last updated and adopted by the City in 1998, with the 2013–2021 Housing Element adopted in 2014 to address the City's future housing needs for the 2013–2021 planning period, in accordance with State laws (South Pasadena 1998, 2014). On May 30, 2023, City Council adopted the EA and approved the 2021–2029 Housing Element. While the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs.

Therefore, the currently adopted (1998) General Plan includes the following seven elements:

- Land Use & Community Design (addressing land use and development issues);
- Circulation & Accessibility (addressing transportation issues);
- Economic Development & Revitalization (addressing economic issues);
- Historic Preservation (addressing historic resource issues);
- Housing (addressing RHNA allocation and housing issues);
- Open Space & Resource Conservation (addressing natural and open space resource issues); and
- Safety & Noise (addressing public health and safety issues).

The goals and policies of the *Land Use & Community Design Element* (Land Use Element) are further interpreted in the form of a diagram, referred to as Land Use Policy Map, which defines the general location and development intensity/density of these uses within the City. Exhibit 2-2, Existing Land Use Policy Map, presented in Section 2.0 of this PEIR, depicts the current land use plan for the City.



Basemap Source: Esri
Data Source: SCAG; South Pasadena

D:\Projects\3SPA\010100\Pro\SouthPasadena_NoiseContours\HQTA and TPA in South Pasadena

HQTA and TPA in South Pasadena

Exhibit 3.10-1

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

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Existing Mission Street Specific Plan

The MSSP was adopted in 1996 (South Pasadena 1996). Under State law (Section 65450 et. seq. of Government Code), a municipality may use a specific plan to develop detailed regulations, programs, and/or legislation to implement its adopted general plan for a specific area within its local jurisdiction. As with the proposed update, the MSSP is a companion document to the 1998 General Plan, tailored to the particular needs of a specific area of the City. The MSSP includes the Mission Street right-of-way from Pasadena Avenue to Fair Oaks Avenue, parcels fronting Mission Street between Fremont Avenue and Indiana Avenues, and areas to the north and south of Mission Street between Fremont Avenue and Orange Avenues. Exhibit 2-3, Mission Street Specific Plan Area, presented in Section 2.0, provides an illustration of the geographic area covered by the MSSP.

When adopted, the MSSP supplemented and refined the City's Zoning Code and other relevant ordinances. The MSSP regulations equivalent to zoning code regulations. All other provisions of the Zoning Code and other ordinances apply to the MSSP area.

The key actions identified in the MSSP, which must be taken by the City and by property owners, merchants, and residents to implement the MSSP, include the following:

- Provide a central parking facility to serve the Blue Line (now ALine) station;
- Establish a Business Improvement District (BID) to help finance parking and streetscape improvements;
- Hire a manager to attract desirable businesses, implement streetscape improvements, and promote the MSSP area; and
- Increase the water pressure so that on-pumps are not required for second and third story uses (South Pasadena 1996).

Zoning Code

The City of South Pasadena Zoning Code (Chapter 36 of the South Pasadena Municipal Code [SPMC]) implements the policies of the General Plan by classifying and regulating the uses of land and structures within the City in a manner consistent with the General Plan. South Pasadena has been divided into zoning districts that implement the General Plan. These districts are established and illustrated on Exhibit 3.10-2, Existing Zoning Map.

3.10.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State California Environmental Quality Act (CEQA Guidelines). A project would result in a significant adverse land use and planning impact if it would:

Threshold 3.10a: Physically divide an established community; or

Threshold 3.10b: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.10.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P2.1 Promote the establishment of a creative industry cluster in the City.

A2.1a Build on the existing presence of arts, cultural and entertainment clusters, and attract small- and medium-scale production/post-production studios, architecture, graphic design, industrial design and multi-media firms, for the likes of which some residents currently commute outside of the City for.

A2.1b Brand and market South Pasadena as a hub of creative businesses.

A2.1c Engage with real estate brokers, landlords, property owners and developers to communicate South Pasadena's value proposition to the creative sector and encourage marketing to creative business sector tenants.

A2.1d Attract creative professional organizations related to the arts, media, design or architecture to locate in the City to serve as professional network hubs and destinations.

P2.2 Focus employment-generating development primarily within the Ostrich Farm District, and as part of infill development in Downtown.

A2.2a Leverage locational strengths to reduce cost of new infill development.

A2.2b Support the renovation and adaptive reuse of existing buildings by educating property developers and property owners on financing mechanisms such as the Property Assessed Clean Energy (PACE) program and historic preservation tax credits.

P2.6 Foster a targeted amount of new growth within the Ostrich Farm district, Huntington corridor, Mission Street, and Fair Oaks Avenue to support the City's tax base.

A2.6a Allow developments to apply for parking and building envelope flexibilities on key corridors to support financially feasible projects through a ministerial process with a set menu of concessions, and/or in return for public benefits.

A2.6b Encourage redevelopment of large single use retail sites along Fair Oaks Avenue to include a mix of uses, appropriate development intensity and an active street front.

A2.6c Promote infill development on vacant and underutilized sites (such as surface parking lots), particularly on main corridors in the Downtown area that currently detract from the City's pedestrian environment by breaking with retail frontages and providing little or no street activation, and do not fully capitalize on the City's fiscal opportunity.

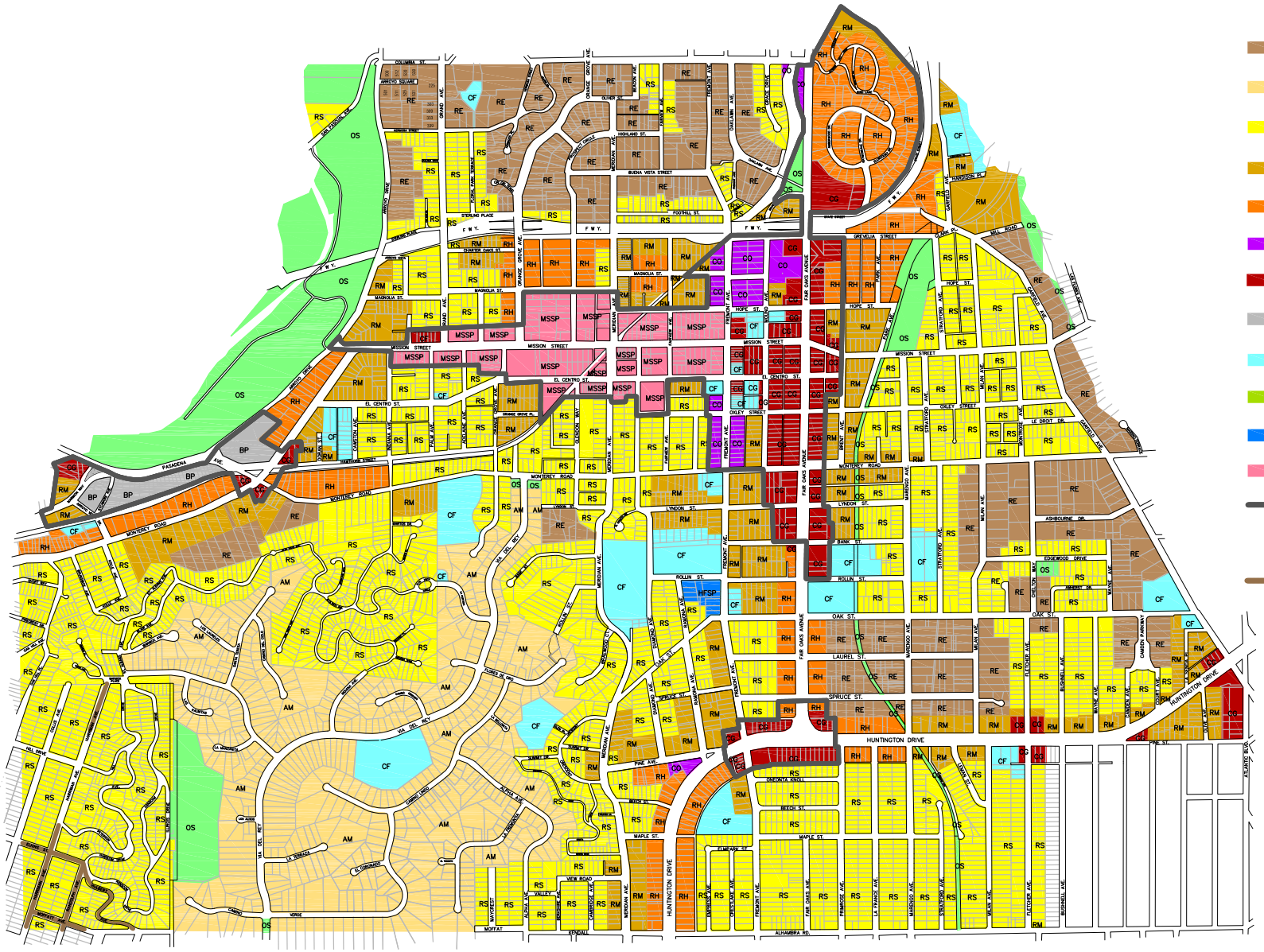
P2.7 Strengthen and grow the City's retail offerings.

A2.7a Create a retail and restaurant destination by attracting specialty stores and unique food and beverage places through targeted branding and engagement with desired businesses.

A2.7b Seek a mix of national credit retailers and independent businesses that can both meet the City's retail needs and adhere to quality design standards to seamlessly fit into a walkable urban environment.

A2.7c Build on the City's cultural organizations to generate foot traffic on main corridors through regular programming, events, and branding.

P2.8 Achieve community benefits in tandem with new development.



Source: City of South Pasadena 2001

Existing Zoning Map

Exhibit 3.10-2

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

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A2.8a Establish a prioritized menu of public benefits, which can potentially include parks and open space, public realm improvements, sustainable building practices, affordable housing, and public parking.

A2.8b Explore mechanisms to fund public improvements with each new development.

P2.10 Encourage a diversity of housing types to promote mixed-use districts and leverage transit access.

A2.10a Support higher-intensity and high-quality multifamily development near the Metro A Line Station, close to retail activity.

P5.5 Support flexible land use policies.

A5.5 Adopt zoning policies that are anticipatory of emerging changes in user needs to better capture demand from emerging industries, providing opportunities to enhance its tax base.

P3.1 Conserve the stable residential neighborhoods.

A3.1a Update the development code to ensure new infill development maintains and enhances the established character of the neighborhood.

A3.1b Through code enforcement and other activities, provide early intervention to promote timely upkeep of the existing housing stock.

P6.1 Promote higher density mix of uses that encourage physical activity.

A6.1a Provide a mix of land uses within new infill projects in the downtown area and neighborhood centers.

A6.1b Activate the ground floor with retail and service uses and attractive and engaging store frontages.

P6.4 Facilitate contact with nature through a network of public and private green space.

A6.4a Prioritize creating new parks in areas underserved by parks and open space.

A6.4b Remove barriers and enhance access to existing parks.

A6.4c Amend development regulations to require new development to provide a range of public and private open spaces.

P8.1 Expand parkland inventory to strive for the standard of 5 acres/1000 residents.

A8.1a Procure a linear park easement from Edison.

A8.1b Consider the feasibility of consolidating individual islands at the intersection of Huntington Drive and Fair Oaks Avenue into a park without impacting the orderly flow of traffic.

A8.1e Amend development code to require new development to provide its fair share of public and private open space.

P8.2 Ensure the maximum distance between residents' homes and the nearest public park or preserve is ½ mile; ¼ mile preferred.

A7.2 Expand the overall parks and recreation system through repurposing public land like excess street space, partnering with other organizations like SPUSD, churches, YMCA, and

similar institutional uses for access and joint use of open space and facilities, and use other creative means to help address service gaps.

P8.4 Identify opportunities to provide small parks or provisional open space uses.

A8.4a Acquire individual lots in areas of the City that are underserved with park land to develop mini parks for the residents' use.

A8.4b Examine underutilized residual spaces for potential use as passive or active open space areas.

P8.5 Develop and support a citywide parklet program.

A8.5a Develop appropriate design guidelines for parklets and streamline the permitting process and maintenance requirements.

A8.5b Support implementation of parklet demonstration projects in the Downtown area.

A8.5c Identify locations for parklets citywide along streets with foot traffic, where automobile traffic is low-speed, and where there are surrounding establishments that can provide a level of surveillance.

P8.6 Identify and remove barriers to access parks. Encourage walking and biking as preferred way to get to and from parks.

A8.6a Increase visibility and access to Orange Grove Park by removing fence barrier.

A8.6b Improve sidewalk conditions leading to parks. Install a new sidewalk on Stoney Drive, the main access that leads down to the lower Arroyo.

A8.6c Provide bike lanes, and biking facilities such as racks and lockers.

P9.2 Support ways to help creative businesses gain access to reasonably priced studios, office space, and housing that is also safe and inviting.

A9.2a Work to ensure South Pasadena's creative sector has adequate and inviting spaces to create, sell their products, and network.

A9.2b Develop and market spaces for artists including studios, affordable housing, and live/work studios.

A9.2c Create central gathering spaces for mingling and events such as an Arts Center that offers a physical and virtual space for South Pasadena's creative sector to connect, create, and promote their art.

A9.2d Establish an arts incubator/accelerator spaces to provide office space, management assistance, technology, and access to funding opportunities.

P9.3 Facilitate the temporary and opportunistic use of vacant or underutilized spaces and venues for artistic purposes.

A9.3a Facilitate artists' temporary and opportunistic use of such spaces and venues as vacant walls, storefronts, empty buildings, open spaces, etc.

A9.3b Provide building owners with tax incentives, grants, loans, and streamlined permitting process to renovate buildings that can be used as live/work spaces by artists.

A9.3c Explore collaboration with SPUSD to utilize their facilities for community arts events and programs (e.g., auditoriums, Middle School's new black box theatre, art studios/classrooms, etc.).

Downtown Specific Plan Update

P2.1 Enhance internal and external economic development delivery capacity.

A2.1a Designate a senior planner or other City staff member to oversee downtown economic development initiatives and partnerships.

P2.2 Attract a greater variety of desirable retail and office tenants by building upon existing strengths and market opportunities.

A2.2a Implement district-wide retail branding and tenanting strategy that builds upon nascent cluster of home furnishings and design stores, while adding other retail desired by the community, such as experience-based retail and retail for a wider demographic.

P2.3 Continue to nurture small, independently-owned businesses.

A2.3a Engage with the Chamber of Commerce or future Downtown BID to better connect local entrepreneurs with US Small Business Administration loans and other Federal or State assistance programs.

A2.3b Engage with successful Farmers' Markets tenants in locating them in retail space in Downtown South Pasadena.

P2.4 Promote higher levels of foot traffic with activities and events.

A2.4a Encourage property owners to collaborate on new "pop-up" events to make use of vacant storefronts or parcels and to generate greater interest in Downtown as a unique retail destination.

A2.4b Create a coordinated calendar of events for different organizations to allow for combined marketing of events.

P2.6 Promote new development that supports existing market opportunities and strengths.

A2.6a Engage the development community and property owners to promote the redevelopment of single-use and single-story retail centers on Fair Oaks Avenue into mixed-use projects with shared parking.

A2.6b Establish an inventory of vacant retail storefronts and vacant commercial parcels with all relevant parcel information, development and use potential, and make publicly available ensure it is regularly updated.

A2.6c Engage the development community and property owners to promote infill development on underutilized sits.

P2.8 Strengthen Downtown South Pasadena's tax base.

A2.8a Support the renovation and adaptive reuse of existing buildings.

A2.8b Locate residential and employment growth in mixed-use buildings.

P3.1 Conserve the small town character and scale of the downtown area, including its traditional urban design form, while creating places of enduring quality that are uniquely fit to their time and place.

A3.1a Develop and adopt a form-based development code that requires the highest standards of context sensitive architecture, urban design, and landscaping.

A3.1b Introduce new infill buildings and renovate existing buildings in a manner that preserves and enhances downtown's walkable urbanism of interconnected streets lined by buildings that engage, frame, and activate the street.

P3.2 Remove regulatory and procedural barriers to good design.

A3.2a Develop and adopt a Form-Based Code for the Downtown area that emphasizes pedestrian orientation, integration of land uses, treatment of streetscapes as community living space, and offers a streamlined development review process.

P3.3 Expand the inventory of publicly accessible community gathering spaces so that residents are within a short walking distance of a park or recreational area.

A3.3a New buildings should incorporate public realm improvements described in the Downtown Vision and integrate such improvements into their existing context in a way that enhances Downtown's public space network.

A3.3b Allow parklets on Mission Street to provide visual interest and expand the useable area of the sidewalk.

P3.5 Provide high quality housing for current and future residents with a diverse range of income levels.

A3.5a Provide for quality housing at a range of income levels and price points, emphasizing housing product that captures the underserved multi-family market.

A3.5b Support workforce and market rate units that will expand and diversify Downtown's housing stock, and support growth in Downtown employment.

A3.5c Provide flexibility in development standards to encourage and facilitate nontraditional housing types and options, including co-housing, assisted living facilities, live-work spaces, and artist lofts.

P5.3 Support the production of new affordable housing projects through standards and process incentives.

A5.3a Adopt flexible regulations that can respond to market changes in emerging industries, and attract contextual development.

A5.3b Leverage Metro A Line Station for walkable mixed-use development opportunities on nearby catalytic sites to provide variety of affordable housing types, local employment, community benefits, and application of extensive TDM measures.

P3.6 Support and ensure restoration and reuse of the historic Rialto Theater.

A3.6a Renovate and protect the historic elements of the theater.

A3.6b Interim uses should be mindful of the historical assets and do no harm.

P6.1 Promote higher density mix of uses that encourage physical activity.

A6.1a Provide a mix of land uses within new infill projects.

A6.2a Activate the ground floor uses along Mission Street and Fair Oaks Avenue with attractive and engaging store frontages, and maximize transparency of facades at ground level to increase visual interest and promote walkability.

P6.4 Repurpose vacant and underutilized spaces that detract from the vitality in the Downtown area for active living.

A6.4 Collaborate with downtown residents and merchants to leverage and repurpose vacant and underutilized lots with temporary or permanent active living and mental wellbeing activities such as community gardens, open spaces, or pop-up events and festivals.

P6.5 Promote a healthy community by providing for Aging in Place in residential development designs.

A6.5 Encourage a mix of housing types and housing units that are inclusive and increase the proportion of areas usable by a wide spectrum of people, regardless of age or ability.

P8.1 Encourage the dynamic and flexible use of existing open spaces and promote a variety of new recreation and open space uses, where appropriate.

A8.1a Explore ways to use the public rights of way as active open space, such as parklets and exercise amenities or for special events. Redesign the open space around the Metro A Line Station to create a large, cohesive, and central civic amenity, improve pedestrian and vehicular flow, and improve the paved surface aesthetics.

A8. Redesign Orange Grove Park with enhanced sight lines and an active, accessible, and visually engaging perimeter design. Explore possible use of Orange Grove Park for other uses in addition to AYSO & Little League.

A8.1c Continue to partner with the South Pasadena School District for the use of their central courtyard to host a variety of public events and festivals.

A8.1d Amend the standards to require and/or encourage private development to provide a range of public and private open spaces on the block, lot, and building.

A8.1e Develop long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.

P9.1 Creative businesses have places to work, live, gather, and promote their art in Downtown.

A9.1a Work to ensure South Pasadena's creative sector has adequate and inviting spaces to create, sell their products, and network.

A9.1b Develop and market spaces for artists including studios, affordable housing, and live/work studios.

A9.1c Identify opportunities to build an Arts Center that offers physical and virtual space for South Pasadena's creative sector to connect, create, and promote their art.

A9.1d Establish an arts incubator/accelerator spaces to provide office space, management assistance, technology, and access to funding opportunities.

P9.2 Facilitate use of vacant retail space by arts and cultural groups.

A9.2a Provide opportunities for artists with temporary use of such spaces and venues as vacant walls, storefronts, empty buildings, open spaces.

A9.2b Provide building owners with tax incentives, grants, loans, and streamlined permitting process to renovate buildings that can be used as live/work spaces by artists.

A9.2c Work with the owners and the developers to put a variety of pop-up art events, exhibits, performances, and temporary retail in their empty spaces will enliven the street.

2021–2029 Housing Element Implementation Programs

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Goal 2.0 Encourage and Assist in the Provision of Affordable Housing

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Goal 3.0 Provide opportunities to increase housing production

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4 Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5 Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB9 and SB10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Goal 4.0 Compliance with State Housing Laws

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Policy 5.5 In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6 Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

Goal 6.0 Expand and strengthen tenant protections for South Pasadena's existing renters

Policy 6.1 Collect and monitor data on South Pasadena's affordable and market rate rental housing stock, including the rents, tenancy, and affordability details of certain rental units.

Policy 6.2 Provide information on applicable state and local tenant protections to both landlords and tenants.

Policy 6.3 Establish and/or strengthen local tenant protections to mitigate or prevent housing instability and displacement of South Pasadena residents who rent their homes.

Program Implementation

The following summarizes the 2021–2029 Housing Element Implementation Programs that must be approved by September 27, 2023, (i.e., 120 days from the Housing Element adoption by City Council on May 30, 2023) pursuant to the Settlement Agreement.

Program 2.e - Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Proposed projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The SPMC complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City

will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in State law.

Program 2.h - Incentivize Special-Needs Housing

The City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.

Program 2.m – Update Inclusionary Housing Regulations

In order to broaden the feasibility for projects to include on-site inclusionary housing, the City will revise the Zoning Ordinance to reduce the required percentage of inclusionary units from 20 percent of base units to 15 percent of base units. Additionally, an exemption to the Ordinance will be included for projects with less than 10 units.

Program 2.n – Citywide Height Limit Ballot Initiative

As discussed further below, consistent with requirements under State law concerning cities placing measures on the ballot, the City will seek through voter approval in a local election, the repeal of the current height limit of 45 feet as to at least any residential or mixed-use (including residential) project on which the Housing Element anticipates a base density in excess of 50 per acre (DUs/acre). Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely or be replaced by a new height limit localized in the areas of increased density to stated density goals. If the height limit is replaced, the new limit will be no less than 84 feet to achieve the densities identified in the DTSP.

Program 3.a - Rezone and Redesignate Sites to Meet RHNA

Th City will re-designate and rezone the parcels listed in Tables VI-50 and VI-51 within the 6th Cycle (2021–2029) Housing Element to address the shortfall of suitably-zoned sites for the lower-income RHNA. As part of this rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Density Residential zone to at least 30 DUs/acre and to at least 45 DUs/acre within the High Density Residential zone. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 15 percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or “by right.” Additional zoning capacity will be achieved along the City’s arterial corridors either through inclusion within the DTSP or through a zoning overlay district. Allowable densities within these areas will be 70 DUs/acre, except for the Fair Oaks zone within the DTSP, which will be 110 DUs/acre. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements, and findings for design review.

Program 3.b - Mixed-Use Developments and Adaptive Re-Use

As part of the rezoning and adoption of the DTSP through Program 3.a, the City will create development standards that encourage the development of high density residential uses. It is

anticipated that the base density of the DTSP zones will be either 70 or 110 DUs/acre, depending on the zone.

Program 3.n – Zoning Changes

This program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the General Plan and DTSP Update. In addition, comparable Zoning Code revisions outside of the DTSP area will further implement this program. The types of standards and processes that will be revised to reduce the constraints on development including, but not limited to, height limits, open space standards, and parking requirements. Additionally, subjective approval findings will be removed in compliance with State law to facilitate administrative approval of residential developments.

Program 5.b – Encourage a Variety of Housing Types

Review and revise the City's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include Residential Estate, Residential Single-Family, Residential Medium Density, and Residential High Density. These types of facilities are still subject to State licensing requirements, when a license is a requirement for the residential care facility.

3.10.6 ENVIRONMENTAL IMPACTS

Threshold 3.10a: Would the Project physically divide an established community?

The City of South Pasadena is largely built out with established residential neighborhoods and commercial corridors. While this fact has contributed to difficulty finding a feasible way to accommodate the high RHNA allocation, the central strategy of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs is preservation of existing neighborhoods and directing calibrated growth. The 2021–2029 Housing Element Implementation Programs identify developable vacant parcels and developed parcels with potential to be redeveloped to accommodate additional housing. Land uses would be intensified in selected areas to accommodate growth and support economic development, but there would not be a significant change in the general land use pattern throughout the City. The primary change would be the introduction of mixed residential/non-residential development and/or higher density residential development in more locations in the City, particularly along major thoroughfares.

The planned development and redevelopment is meant to revitalize neighborhoods, rather than divide them, and would enable more residential development or mixed-use development (i.e., residential and commercial) than presently allowed. The purpose of the Project is to locate carefully calibrated and designed growth that can accommodate the bulk of anticipated growth while conserving the established residential neighborhoods while meeting the City's required

RHNA allocation and RHNA surplus while providing an enhanced variety of housing. The City's design guidelines and design review process and zoning regulations, and the DTSP's form-based code, would help ensure that proposed intensification of land uses on selected parcels would not be of sufficient size, scale, and/or massing to divide the surrounding community. In some instances, addition of new streets may be necessary to break up the large-scale super-blocks into pedestrian-oriented blocks, or complete a block with missing buildings, open space, or infrastructure. However, any new streets would be necessary to create a greater sense of place and community, rather than dividing an existing community. Additionally, the DTSP street standards require that new streets shall be designed as Complete Streets to ensure a walkable scale and safety for all users. As discussed, the existing development pattern in the City would not be substantively altered with implementation of the Project. Therefore, implementation of development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not result in division of any existing, established communities. There would be a less than significant impact, and no mitigation is required.

Threshold 3.10b: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Consistency of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs with regional and local land use planning documents and programs that apply to the City, as well as land use compatibility, is discussed below.

Consistency with State Land Use Planning Laws

The current statutory State planning priorities, as defined in Section 65041.1 of the Government Code, "which are intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety in the state, including in urban, suburban, and rural communities, shall be as follows:

a) To promote infill development and equity by rehabilitating, maintaining, and improving existing infrastructure that supports infill development and appropriate reuse and redevelopment of previously developed, underutilized land that is presently served by transit, streets, water, sewer, and other essential services, particularly in underserved areas, and to preserving cultural and historic resources.

b) To protect environmental and agricultural resources by protecting, preserving, and enhancing the state's most valuable natural resources, including working landscapes such as farm, range, and forest lands, natural lands such as wetlands, watersheds, wildlife habitats, and other wildlands, recreation lands such as parks, trails, greenbelts, and other open space, and landscapes with locally unique features and areas identified by the state as deserving special protection.

c) To encourage efficient development patterns by ensuring that any infrastructure associated with development, other than infill development, supports new development that does all of the following:

    1) Uses land efficiently;

    2) Is built adjacent to existing developed areas to the extent consistent with the priorities specified pursuant to subdivision (b);

    3) Is located in an area appropriately planned for growth;

4) Is served by adequate transportation and other essential utilities and services; and

5) Minimizes ongoing costs to taxpayers."

The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs are consistent with all State planning priorities. The primary focus of the Project is to direct carefully calibrated growth to five focus areas within the City. These focus areas were selected in part to conserve the established residential neighborhoods, and also because they are the more urban areas of the City with existing infrastructure, near transit service, and are therefore appropriate for the greatest concentration of infill redevelopment, ensuring efficient use of land and environmental resources. As noted above, the 2021–2029 Housing Element Implementation Programs identify developable vacant parcels and developed parcels with potential to be redeveloped to accommodate additional housing both within and outside of the focus areas. The proposed General Plan and DTSP Update has been prepared in accordance with State requirements for General Plans and specific plans pursuant to Sections 65300 et. seq. of the Government Code. The proposed 2021–2029 Housing Element Implementation Programs have been prepared in accordance with all current State requirements that apply specifically to housing elements, as one of the mandated General Plan elements, including but not limited to SB 375, SB 330, SB166, AB 1233, and AB 1397.

The term "element" refers to the topics that California law requires to be covered in a general plan. There is no mandatory structure or maximum number of elements or chapters that a general plan must include. Once added into the general plan, each element, regardless of statutory requirement, assumes the same legal standing, and must be consistent with other elements or chapters. There are eight required elements, including housing. The remaining seven required elements defined in State law include: circulation, conservation, land use, open space, noise, safety, and an environmental justice element (that can alternatively be integrated into the other seven required elements, pursuant to Section 65302[h] of the Government Code). The General Plan and DTSP Update's eight chapters incorporate the required contents of the State-defined elements but are presented in a more comprehensive way and with less compartmentalization between multi-faceted topics. The Project's eight chapters also incorporate non-required topics of social equity and healthy communities. Table 3.10-1, Comparison of Proposed General Plan Chapters and Required Elements, summarizes the relationships between the required and the proposed General Plan and DTSP Update chapters and describes the topics covered in each chapter.

TABLE 3.10-1
COMPARISON OF PROPOSED GENERAL PLAN AND DTSP UPDATE CHAPTERS AND REQUIRED ELEMENTS

Proposed General Plan Chapter	Required or Optional Element	Topics Covered
1–Our Natural Community	Conservation, Open Space	Air and water, greenhouse gases, open space, hillsides, watersheds, riparian areas, plants and animals
2–Our Prosperous Community	Economic Development	Fiscal health, economic diversification, job growth, tourism
3–Our Well Planned Community	Land Use/Design, Housing, Parks and Recreation	Place types, visual character, nature of intended change, and housing
4–Our Accessible Community	Circulation	Street networks, street types, transit services, bicycle and pedestrian systems, parking, transportation demand management, and performance metrics

5- Our Resilient Community	Land Use	Development patterns and support systems
6Our Health Community	Public Health, Noise, and Land Use	Physical health, mental health, social capital, and access to healthy food
7–Our Safe Community	Safety	Police, fire, and natural hazards
8–Our Active Community	Land Use, Open Space, Parks and Recreation	Open Spaces, parks and recreation facilities, youth and senior programs
9–Our Creative Community	Culture	Arts, culture, schools, libraries, historic resources

The guiding principle and primary goal of each of the eight chapters of the proposed General Plan and DTSP Update, and the main State-required element(s) addressed by that chapter, are as follows:

The guiding principles of each of the nine chapters are as follows:

- **Our Natural Community.** Strive to live in balance with the City's natural environment. Preserve natural areas and increase the quantity of and access to open space. (Incorporates the conservation, land use, and open space elements.)
- **Our Prosperous Community.** Attract and retain high-value, high-wage jobs within the creative sector and Science, Technology, Engineering, and Mathematics (STEM) fields, and increase the local tax base to help fund vital public services. Provide affordable and quality housing, amenities, and services that make South Pasadena a desirable place for employees to work and live. (Incorporates the circulation and land use element requirements.)
- **Our Well Planned Community.** Direct new growth to the downtown area along Mission Street and Fair Oaks Avenue, the Ostrich Farm district, and neighborhood centers along Huntington Drive and Garfield Avenue. Allow new multi-family residential development, including deed-restricted affordable units, in established multi-family neighborhoods while protecting affordable housing for lower income tenants and ensuring compatible development. Develop clear and precise objective standards that offer predictable outcomes and processes. Encourage pedestrian-oriented mixed-use development integrating housing with commercial uses, while providing new and enhanced existing public spaces and gathering places. (Incorporates the land use and housing element requirements.)
- **Our Accessible Community.** Provide safe access for all street users–pedestrians, cyclists, public transit users, and motorists–of all ages and abilities. Support an integrated multi-modal network and efficiently manage parking to support wider community goals. (Incorporates the circulation element requirements.)
- **Our Resilient Community.** Increase individual, institutional, and business capacity to survive, adapt to any chronic stress or acute shocks and be able to recover and thrive.
- **Our Healthy Community.** Create environments that encourage healthy lifestyles and maximize opportunities for physical activity. A well-designed public and semi-public realm can foster social interaction, and good programming can draw people out of their homes and into the community. (Incorporates the circulation, land use, noise and safety element requirements.)
- **Our Safe Community.** Provide a safe environment for people of all ages and minimize threats to life and damage to structures. Increase environmental awareness and take

measures to increase the community's resilience to shifting conditions due to climate change and to be prepared for any emergency. (Incorporates the noise and safety element requirements.)

- **Our Active Community.** Add to and enhance City parks and open spaces to provide enriching recreational opportunities. (Incorporates the land use and open space element requirements.)
- **Our Creative Community.** Become a vibrant, diverse, cultural center by weaving creative expressions that reflect all community members into everyday life. (Incorporates conservation and land use element requirements.)

Various chapters of the proposed General Plan and DTSP Update contain policies and actions that help the City implementation of AB 1358 (the California Complete Street Act), in particular Our Accessible Community.

The provisions of Section 65450 et. seq. of the Government Code require that a specific plan be consistent with the adopted general plan of the jurisdiction within which it is located. As the General Plan and DTSP Update are being prepared contemporaneously with the 2021–2029 Housing Element Implementation Programs, the documents would be consistent. Additionally, the General Plan and DTSP Update have been prepared to be consistent with the 2021–2029 Housing Element Implementation Programs, related to land use designations and zoning as well as housing-related policies and programs. While the City has approved a 6th Cycle Housing Element (on May 30, 2023), the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs. The programs that require adoption within the 120-day window are presented above at the end of Section 3.10-7, Proposed Policies and Actions. Additionally, the General Plan and DTSP Update were revised to ensure consistency with the adopting Housing Element. There would be no impact, and no mitigation is required.

Consistency with SCAG 2020-2045 RTC/SCS

Table 3.10-2, SCAG 2020–2045 RTP/SCS Consistency Analysis, provides an assessment of the Project's consistency with the 2020-2045 RTP/SCS goals. As demonstrated through this analysis, implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would be consistent with the goals of SCAG's RTP/SCS. Consistency with the SCAG and other applicable demographic projections are addressed separately in Section 3.12, Population and Housing.

TABLE 3.10-2
SCAG 2020-2045 RTP/SCS CONSISTENCY ANALYSIS

RTP/SCS Plan Goals	Consistency Analysis
Goal 1: Encourage regional economic prosperity and global competitiveness.	**Consistent:** Encouraging regional economic development and competitiveness is not the purview of the City, but SCAG. However, the General Plan Update goal of the Our Prosperous Community chapter is to "Attract and retain high-value, high-wage jobs within the creative sector and Science, Technology, Engineering, and Mathematics (STEM) fields, and increase the local tax base to help fund vital public services. Provide affordable and quality housing, amenities, and services that make South Pasadena a desirable place for employees to work and live." This applies to all portions of the City.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent:** The transportation network in the City is well established; however, some improvements to the network could occur with implementation of the Project. The Project would maximize mobility, accessibility, reliability, and safety through designing street improvements that would consider both the existing and future context of transportation and land use, by focusing most development in locations proximate to existing transit, and by providing streets that are equitably designed for multiple travel modes (i.e., complete streets). As with the existing transportation network, any improvements proposed would be designed and maintained to continue to meet the needs of local and regional mobility. The Project supports development of a multi-modal transportation system integrated with the existing and proposed land uses, particularly in the focus areas and along major thoroughfares, and promotes pedestrian-oriented mixed-use development to reduce vehicle use.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**Consistent:** Enhancing the regional transportation system is not the purview of the City, but SCAG. However, all modes of travel, both motorized and non-motorized, and commercial transit throughout the City would be required to follow safety standards established by corresponding State, regional (i.e., SCAG, Caltrans), and local (i.e., County and City) regulatory standards.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	**Consistent:** Convenient accessibility to multiple travel modes within the City (pedestrian, bike, rail, bus, and auto), as discussed in the Our Accessible Community chapter of the General Plan and DTSP Update, would contribute to increased movement of both goods and people as well as travel choices. The local transportation system would continue to be improved and/or maintained to maximize circulation productivity.
Goal 5: Reduce greenhouse gas emissions and improve air quality.	**Consistent:** The reduction of greenhouse gas (GHG) emissions and improvement of air quality would be encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques. The expansion of the mixed-use development capacity in the in the City with the General Plan and DTSP Update places emphasis on focusing new development capacity in established transit corridors incentivizes non-motorized transportation modes such as biking and walking. This strategy, which acknowledges the relationship between land use and mobility, would reduce vehicle miles traveled per capita and thereby reduce impacts related to air quality and GHG emissions.

TABLE 3.10-2
SCAG 2020-2045 RTP/SCS CONSISTENCY ANALYSIS

RTP/SCS Plan Goals	Consistency Analysis
Goal 6: Support healthy and equitable communities.	**Consistent:** The Project would increase opportunities for a variety of housing types near jobs, services, recreation, and transit. The Project would also introduce a greater variety of housing types and serving all income levels, thereby supporting healthy and equitable communities.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent:** As discussed for Goal 4, the expansion of the mixed-use development capacity in the in the City with the General Plan and DTSP Update places emphasis on focusing new development capacity in established transit corridors incentivizes non-motorized transportation modes such as biking and walking. This strategy, which acknowledges the relationship between land use and mobility, would reduce vehicle miles traveled per capita and thereby reduce impacts related to air quality and GHG emissions. The Project would increase opportunities for a variety of housing types near jobs, services, recreation, and transit. This densification with a mix of land uses accessible through multiple transportation modes contributes to climate change adaptation and integrates into the regional development pattern proposed by SCAG.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Consistent:** As transportation-related technologies develop that would be applicable at the scale of an individual city, the City's Public Works Department would leverage these technologies where economically feasible.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent:** The Project would increase opportunities for a variety of housing types near jobs, services, recreation, and transit. The Project would also introduce a greater variety of housing types and serving all income levels, thereby supporting healthy and equitable communities.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent:** The General Plan Update has a policy to provide 5 acres of parks for every 1,000 residents. Therefore, the City's existing parks and open space areas are not proposed to be converted to residential or non-residential (i.e., commercial, retail, office) land uses. There are no lands zoned for agriculture in the City, and the Project does not propose changing the land use designations of any existing open space areas.

As shown in Table 3.10-2, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs are consistent with SCAG's 10 goals presented in the 2020–2045 RTC/SCS. As noted above, while the City has approved a 6th Cycle Housing Element (on May 30, 2023), the City still must adopt zoning code updates. These zoning code update include changes necessary to implement the proposed land use plan, which in turn implements the RHNA allocation and HCD-recommended surplus. As the RHNA is a SCAG program, consistency with the RHNA program supports consistency with the policies of the 2020–2045 RTC/SCS. This is because the Project promotes a land use pattern with increasing density, a mix of housing types and land uses, and places the highest density proximate to local and regional, multi-modal transportation systems. There would be no impact, and no mitigation is required.

Zoning Code

Whereas the 2021–2029 Housing Element Implementation Programs General Plan is a policy document and sets forth direction for housing-related development decisions, the Zoning Code in the SPMC is the regulatory "document" that establishes specific standards for the use and development of all properties in the City. The Zoning Code regulates development intensity using a variety of methods, such as setting limits on building setbacks, yard landscaping standards, and building heights; it also indicates which land uses are permitted in the various zones.

As a result of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, some portion of the City's Zoning Code would no longer be consistent with the goals, policies, and actions of the existing General Plan. As discussed in Section 2.0, Environmental Setting and Project Description, while the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs. If the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs documents are adopted, the City will subsequently need to review and update, as needed, its Zoning Code to make sure it is consistent with the land use policies in the planning documents. The Housing Element Implement Programs, listed above, being considered as part of this PEIR would address many of the consistency updates to the City's Zoning Code. Further, the DTSP Update has an accompanying development code (DTSP Code, Code) to guide the DTSP's implementation, providing all requirements for development and land use activity within the DTSP's boundaries. The DTSP Code establishes a regulating plan as the map that identifies the zoning districts, overlays, and parcels within the DTSP Code's boundaries.

Therefore, with the concurrent zoning updates undertaken to implement the Housing Element Implementation Programs, and planned review and update of the Zoning Code, and incorporation of the DTSP Code into the Zoning Code, subsequent to adoption of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, there would be no conflict between the City's Zoning Code regulations and the General Plan and DTSP Update. There would be no impact, and no mitigation is required.

Land Use Compatibility

Future development pursuant to the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs have been considered during the planning process to create a balance among land uses throughout the City and promote land use compatibility within the City, as discussed further above and in Section 2.0, Environmental Setting and Project Description, of this PEIR, while meeting State and regional requirements. The details of the zoning code updates required to implement the 2021–2029 Housing Element as well as the General Plan and DTSP Update are discussed further above. The placement of intensified land uses as part of the Project was carefully considered to provide smooth transitions between different land use designations. Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would change individual development sites, as structures and site improvements are introduced on vacant lands and as older developments are replaced with newer structures and site improvements that would likely have a different architectural style and may be more intense than the pre-existing land use. However, the central strategy of the Project is to preserve and enhance the distinctive neighborhoods and direct

calibrated growth to focus areas while providing enhanced housing opportunities. The proposed land use plan (refer to Exhibit 2-4, Proposed Land Use Map, in Section 2.0, Environmental Setting and Project Description) assumes that the existing, established development pattern would stay essentially the same, with an incremental intensification of existing and new land uses, where future development and redevelopment would be designed and scaled to complement surrounding uses. The majority of existing land uses in the City are not expected to change substantively, and new development is anticipated to occur largely as infill redevelopment or development. As discussed further in Section 3.1, Aesthetics, the City's design guidelines, project review processes, Project policies and actions set forth that would enhance community aesthetics, and the proposed zoning code (including DTSP Code) would all contribute to a high-quality public realm and ensure land use compatibility internal to the City.

While there are proposed zoning changes outside of the focus areas to accommodate additional housing opportunities except for the Huntington Drive/Garfield Avenue and Huntington Drive/Fletcher Avenue neighborhood centers and some of the proposed housing sites, there would not be substantial changes to existing and planned land uses along the boundaries of South Pasadena with the cities of Los Angeles, Pasadena, San Marino, and Alhambra with implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs These more substantive changes from existing to proposed development patterns are therefore the focus of the analysis of compatibility with adjacent jurisdictions. The compatibility of proposed land uses in the two focus areas with boundaries along adjacent municipalities are discussed below:

- ***Huntington Drive and Garfield Avenue Neighborhood Center:*** Current land uses within this focus area include three commercial businesses and a vacant lot owned by the YMCA. The portion of this neighborhood center on the north of Huntington Drive abuts the City of San Marino on the east across Garfield Avenue, where a small office park is present. The portion on the south side of the street abuts the City of Alhambra of the east and the south across Garfield Avenue, Atlantic Boulevard, and Pine Street, where commercial, multi-family, and single-family land uses are present. The City of San Marino has designated the adjacent area as Commercial, and the City of Alhambra has designated the adjacent areas as General Commercial, and High, Medium, and Low Density Residential (San Marino 2016, Alhambra 2010). The proposed Mixed-Use designation for this Neighborhood Center would be consistent with these existing land uses and provide increased compatibility with the residential uses in the City of Alhambra compared to the existing conditions. There would be no land use incompatibility in this area.
- ***Huntington Drive and Fletcher Avenue Neighborhood Center:*** Current land uses within this focus area include five buildings with commercial and office uses. The southeastern portion of this neighborhood center abuts the City of Alhambra on the east, where similarly scaled commercial land uses are present. At present, the Eden Preschool is situated adjacent to the southeastern boundary of this neighborhood center. The City of Alhambra has designated the adjacent area as General Commercial (Alhambra 2019). The proposed Mixed-Use Designation for this Neighborhood Center would be consistent with these existing land uses. Residential land uses are situated to the south, in South Pasadena, and to the southeast, in Alhambra. The Mixed-Use Designation would provide an appropriate bridging of land uses. There would be no land use incompatibility in this area.

There are parcels along the northeastern, southeastern, southern, southwestern, and western boundaries of the City that are potential housing and/or non-residential development sites. The

proposed zoning for parcels that abut the City boundary would include Residential Low Density, Residential Medium Density, Residential High Density, Commercial Office, Commercial General, and Community Facility; however, the majority of parcels along the City edges are proposed to be residential. In some instances, the proposed zoning aligns with the existing development on a parcel. These proposed land uses are compatible with existing development within the City as well as existing development and allowed zoning on parcels abutting the City.

Parcels in the northeastern corner are near the City of Pasadena where public facilities (Pasadena Water and Power and Blair Middle School and High School campuses) are present. Development of housing in this area would be consistent with the existing residential land uses located to the south and west within the City. Parcels in the southeastern corner are an extension of the proposed Neighborhood Center and the Huntington Drive and Garfield Avenue, discussed above. The proposed residential zoning intensity matches and would complement the existing multi-family residential development prominent in this area. The parcels on the north side of the Huntington Drive and Alhambra Road intersection have proposed zoning of Residential Medium Density and Residential High Density. Development consistent with the proposed zoning would integrate well into the existing mix of primarily multi-family with some single-family and commercial land uses in the vicinity of this intersection. Where parcels border the open space area off the southwestern corner of the City, allowable residential development would be of a type and scale appropriate to bridge between the existing residential and the open space. The parcels within the westernmost portion of the City abut the City of Los Angeles where primarily single- and multi-family residential land uses and open space land uses are present. Development of housing on these parcels would be consistent with the existing residential land uses located both within the City of South Pasadena and the City of Los Angeles.

As discussed above, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not result in land use incompatibilities, including with adjacent jurisdictions. Impacts would be less than significant, and no mitigation is required.

3.10.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

The cumulative impacts related to demographic growth are analyzed within the County of Los Angeles, because County-wide demographic data is available from SCAG, Department of Finance, and Employment Development Department. Also, because of the interconnected nature of cities and unincorporated areas in the Los Angeles metropolitan area, due to roadways, increasing transit, and other sociological factors, demographic growth in a smaller sized City like South Pasadena cannot be treated like an “island” as it is part of the fabric of the region.

Growth and development in the City and surrounding jurisdictions would be accompanied by changes in existing land uses throughout the County and the SCAG region. New development on vacant areas and underutilized lots are anticipated to be developed in accordance with each local jurisdiction’s respective general plan and associated housing element and would lead to intensification of housing, commercial, and industrial/manufacturing development, as well as public and institutional uses, throughout the region. SCAG estimates there could be as many as 11,423,962 persons, 4,002,104 households (not housing units), and 5,276,927 jobs throughout the County by 2040 (Table 2-4; SCAG 2020; Aguilar 2021). This increasing urbanization and

development in the County and throughout the SCAG region are a result of vacant lands being replaced with more urban land uses and underutilized lots being redeveloped into uses that are more intensive. The General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not divide established communities or result in the introduction of incompatible uses in the area, provided compliance with the City's development standards and applicable regulations.

New development in adjacent jurisdictions would be evaluated for consistency with the local jurisdiction's land use policies, just as proposed projects in the City would be evaluated for consistency with the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. If discretionary actions are needed, individual projects would be subject to evaluation for potential environmental impacts to the extent required by CEQA. This review process would address potential land use compatibility issues and planning policy conflicts. Future growth and development in the City and the surrounding areas would proceed in accordance with the applicable municipality's general plan and zoning code. Required review processes for new developments would analyze a project for conformity with applicable land use plans and policies, and within the context of existing and planned developments relative to the environmental goals and policies of the applicable general plan. Projects requiring general plan amendments or zone changes/variances would need to show consistency with the applicable goals, policies, and/or actions and thus are not expected to lead to land use incompatibilities or conflicts. Planned or required infrastructure and public facilities associated with individual projects would provide the necessary facilities and services to existing and future developments. Thus, these projects would complement the private development projects planned for the Valley. The cumulative land use impacts of growth and development in the San Gabriel Valley would be less than significant, and no mitigation is required.

3.10.8 MITIGATION MEASURES

No significant adverse impacts related to land use and planning have been identified with implementation of the General Plan and DTSP Update and 2021–2029 Housing Element Implementation Programs. Therefore, no mitigation is required.

3.10.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative level.

3.10.10 REFERENCES

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3.11 NOISE

3.11.1 METHODOLOGY

This section analyzes potential noise and vibration impacts associated with the implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element implementation Programs Project (Project).

In 2018, Urban Crossroads, Inc. (Urban Crossroads) prepared the *South Pasadena General Plan and Downtown Specific Plan Update, Noise Impact Analysis* (2018 Noise Analysis) based on the parameters described in the 2018 Notice of Preparation (589 dwelling units and 430,000 square feet of non-residential development). In 2023, Psomas updated the modeling of construction and operational noise and vibration based on 2,067 dwelling units and 430,000 square feet of non-residential development. However, relevant information from the 2018 Noise Analysis remains applicable, particularly the baseline noise measurements, as the COVID-19 pandemic was affecting traffic and light rail use at the time this updated analysis was prepared. Therefore, information in this section is derived from the:

- 2018 Noise Analysis prepared by Urban Crossroads, Inc. and included in Appendix E-1 to this Program Environmental Impact Report (PEIR), and
- Updated noise modeling by Psomas that is summarized below and included in Appendix E-2.

The traffic (i.e., mobile source) noise analysis has been prepared based trip generation associated with the 2023 transportation analysis, which is described in Section 3.14, Transportation, of this PEIR.

Noise Measurements

To determine the baseline noise level environment and to assess potential noise impacts, a total of 7 short-term and 14 long-term (24-hour) noise level measurements were taken at sensitive receiver locations throughout the City of South Pasadena (City). These noise level measurements were used to assess the noise environment and to calibrate the noise prediction models. Each of these noise level measurement locations and noise levels are detailed in the Noise Analysis (Appendix E-1) and described further below under Section 3.11.2, Existing Conditions. As noted above, the 2018 noise measurements are used as the baseline noise conditions because they more accurately represent “business as usual” conditions in the City compared to Spring 2021 when the effects of the COVID-19 pandemic on daily activity and related transportation levels, which are the primary noise source in the City, remain atypical. The 2018 noise measurements are focused on the conditions in and near the 5 focus areas. Although the geographic extent of potential development is more dispersed with inclusion of the 2021–2029 Housing Element implementation, the locations of the noise measurements remain appropriate because these are the densest areas of the City and/or the areas that have the highest traffic volumes.

Traffic Noise Prediction

The projected roadway noise from vehicular traffic was projected using a computer program that replicates the Federal Highway Administration (FHWA) Traffic Noise Prediction Model- FHWA-RD-77-108 (the “FHWA Model”). The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL). In California the national REMELs are substituted with the California Vehicle Noise (Calveno) Emission Levels.

Adjustments are then made to the reference energy mean emission level to account for the roadway classification (e.g., collector, secondary, major and arterial); the roadway active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway); the total average daily traffic (ADT); the travel speed; the percentages of automobiles, medium trucks, and heavy trucks in the traffic volume; the roadway grade; the angle of view (e.g., whether the roadway view is blocked); the site conditions ("hard" or "soft" relates to the absorption of the ground, pavement, or landscaping); and the percentage of total ADT, which flows each hour throughout a 24-hour period.

Off-Site Traffic Noise Prediction Model Inputs

A total of 170 study area roadway segments were assessed. Inputs included a description of each roadway segment, including the distance from the centerline to adjacent land use based on the functional roadway classifications, posted speed limits, and the traffic flow distribution (vehicle mix). The traffic volumes used for the traffic noise calculations were obtained from calculations provided by the Project traffic consultant, Iteris, Inc. (Iteris).

Rail Noise and Vibration

The Federal Transit Administration (FTA) *Transit Noise Impact and Vibration Assessment* Noise Impact Assessment methodology was used for railroad-related noise modeling to estimate worst-case future conditions. The existing rail volume was increased by 40 percent as identified by the FTA as resulting in an approximate 2 dBA change in noise level for assessing future conditions.

Railroad vibration impacts from the Metro A Line are estimated using the FTA General Vibration Assessment methodology, which calculates the predicted vibration level based on generalized ground surface vibration curves, developed using actual measurements of representative North American transit systems. The generalized reference curves for ground surface vibration from transit sources in the FTA methodology were used to identify the appropriate reference vibration level, before any adjustments, for the Project based on the type of train, speed, and distance to receiver locations.

3.11.2 EXISTING CONDITIONS

Noise Background

Noise has been simply defined as "unwanted sound." Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, when it has adverse effects on health, or, as stated in the South Pasadena Municipal Code (SPMC), is unnecessary, excessive, or annoying. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Exhibit 3.11-1, Typical Noise Levels, presents a summary of the typical noise levels with representative outdoor and indoor activities, their subjective loudness, and the effects of the noise.

Range of Noise

Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10, the logarithmic scale. The scale for measuring intensity is the decibel scale. Each interval of 10 decibels indicates a sound energy

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Source: Urban Crossroads 2018

Typical Noise Levels

Exhibit 3.11-1

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

PSOMAS

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ten times greater than before, which is perceived by the human ear as being roughly twice as loud. The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at 3 feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 100 feet, which can cause serious discomfort. Another important aspect of noise is the duration of the sound and the way it is described and distributed in time.

Noise Descriptors

Environmental noise descriptors are generally based on averages, rather than instantaneous noise levels. The most commonly used figure is the equivalent level (L_{eq}). Equivalent sound levels are not measured directly but are calculated from sound pressure levels typically measured in A-weighted decibels (dBA). The equivalent sound level (L_{eq}) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period and is commonly used to describe the "average" noise levels within the environment.

Peak hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL), representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. Time of day corrections require the addition of 5 decibels to dBA L_{eq} sound levels in the evening from 7:00 PM to 10:00 PM, and the addition of 10 decibels to dBA L_{eq} sound levels at night between 10:00 PM and 7:00 AM. These additions are made to account for the noise-sensitive time periods during the evening and night hours when sound appears louder. CNEL does not represent the actual sound level heard at any time, but rather represents the total sound exposure. The City of South Pasadena relies on the 24-hour CNEL level to assess land use compatibility with transportation-related noise sources.

Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors.

Geometric Spreading

Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source.

Ground Absorption

The propagation path of noise from a highway to a receptor is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receptor, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those

sites with an absorptive ground surface between the source and the receptor such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source.

Atmospheric Effects

Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation). Other factors such as air temperature, humidity, and turbulence can also have significant effects.

Shielding

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an “out of sight, out of mind” effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby resident. However, for vegetation to provide a substantial or even noticeable noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide and dense enough to completely obstruct the line-of sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction.

Community Response to Noise

Community responses to noise may range from registering a complaint by telephone or letter, to initiating court action, depending upon everyone’s susceptibility to noise and personal attitudes about noise. Approximately ten percent of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints will occur. Another 25 percent of the population will not complain even in very severe noise environments. Thus, a variety of reactions can be expected from people exposed to any given noise environment. Surveys have shown that about ten percent of the people exposed to traffic noise of 60 dBA will report being highly annoyed with the noise, and each increase of one dBA is associated with approximately two percent more people being highly annoyed. When traffic noise exceeds 60 dBA or aircraft noise exceeds 55 dBA, people may begin to complain. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels. An increase or decrease of 1 dBA cannot be perceived except in carefully controlled laboratory experiments, a change of 3 dBA is considered barely perceptible, and changes of 5 dBA are considered readily perceptible.

Land Use Compatibility with Noise

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area’s desirability as a place to live, shop, and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local governments to regulate land development in such a way that noise-sensitive land uses are either

prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that any noise impacts are minimized.

Vibration

Per the FTA, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

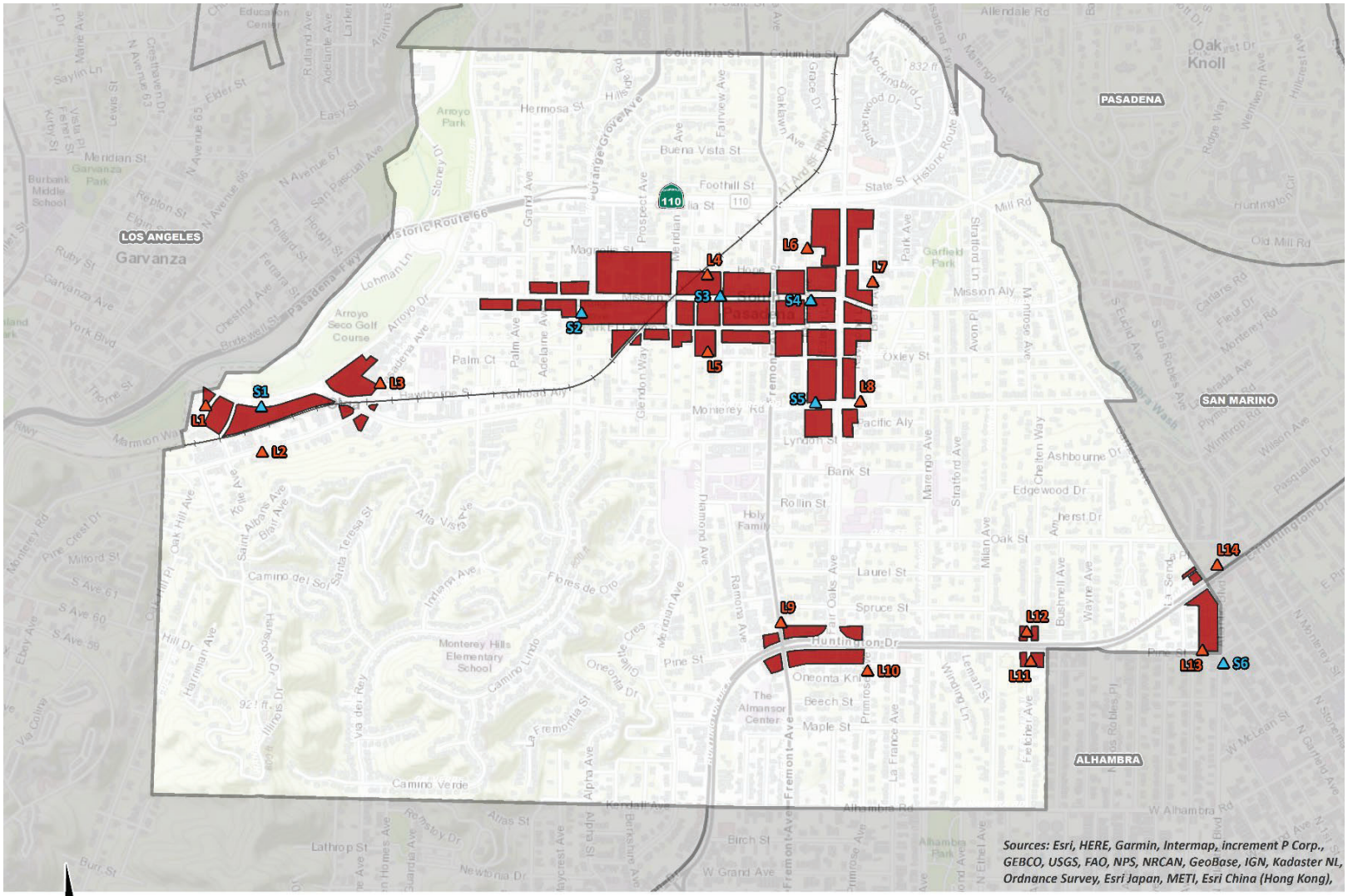
There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Baseline Noise Level Measurements

Noise level measurements were taken in February 2018 during typical weekday conditions at sensitive receiver locations in the Project study area. The measurement locations were selected to describe and document the baseline noise environment within the City. Exhibit 3.11-2, Noise Measurement Locations, provides the boundaries of the City and the noise level measurement locations.

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels. Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive



Source: Urban Crossroads 2018

Noise Measurement Locations

Exhibit 3.11-2

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

PSOMAS

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receiver locations allows for a comparison of the before and after noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels.

Long-Term Noise Measurement Results

Table 3.11-1, Long-Term Noise Level Measurements, summarizes the hourly daytime (7:00 AM. to 10:00 PM) and nighttime (10:00 AM to 7:00 PM) noise levels expressed as L_{eq} and the 24-hour CNEL, and compares the existing noise levels to the CNEL land use compatibility criteria of the City of South Pasadena General Plan Safety and Noise Element, for each long-term noise measurement location identified on Exhibit 3.11-2.

TABLE 3.11-1
LONG-TERM AMBIENT NOISE LEVEL MEASUREMENTS

Location	Adjacent Focus Area	Description	Hourly Noise Level (dBA L_{eq})[1]		CNEL	Land Use Compatibility[2]
			Daytime	Nighttime		
L1	Ostrich Farm	Located south of Pasadena Avenue on Arroyo Verde Drive adjacent to existing office land uses.	56.0	51.0	59.0	*Normally Acceptable*
L2		Located on Monterey Road adjacent to existing residential homes, south of the Metro A Line.	64.0	56.9	65.8	*Conditionally Acceptable*
L3		Located on Pasadena Avenue adjacent to existing office and residential land uses, north of the Metro A Line.	55.6	48.9	57.5	*Normally Acceptable*
L4	Downtown Specific Plan	Located on Hope Street adjacent to existing retail uses, residential homes, and the Metro A Line.	64.3	60.6	68.1	*Normally Acceptable (Retail) & Conditionally Acceptable (Residential)*
L5		Located adjacent to the South Pasadena Public Library and near existing residential homes between Diamond Avenue and Fairview Avenue.	51.2	43.2	52.5	*Normally Acceptable*
L6		Located on Mound Avenue near existing residential homes.	53.5	46.5	55.2	*Normally Acceptable*
L7		Located on Brent Avenue adjacent to existing office, retail, and residential uses.	57.8	50.2	59.2	*Normally Acceptable*
L8		Located on Monterey Road, east of Fair Oaks Avenue, near existing residential homes.	59.7	55.7	63.3	*Conditionally Acceptable*

TABLE 3.11-1
LONG-TERM AMBIENT NOISE LEVEL MEASUREMENTS

Location	Adjacent Focus Area	Description	Hourly Noise Level (dBA L_{eq})[1]		CNEL	Land Use Compatibility[2]
			Daytime	Nighttime		
L9	Huntington Dr. & Fremont Ave.	Located on Fremont Avenue near existing residential homes and retail uses.	66.2	62.6	70.2	*Normally Acceptable (Retail) & Conditionally Acceptable (Residential)*
L10		Located on Primrose Avenue near existing residential homes, south of Huntington Drive.	53.2	43.5	53.9	*Normally Acceptable*
L11	Huntington Dr. & Fletcher Ave.	Located on Fletcher Avenue near existing office and residential uses, south of Huntington Drive.	63.3	58.5	66.3	*Normally Acceptable (Office) & Conditionally Acceptable (Residential)*
L12		Located on Fletcher Avenue adjacent to existing office and residential uses.	63.2	58.4	66.1	*Normally Acceptable (Office) & Conditionally Acceptable (Residential)*
L13	Huntington Dr. & Garfield Ave.	Located on Huntington Drive adjacent to an existing office building.	60.5	57.0	64.4	*Normally Acceptable*
L14		Located on Pine Street adjacent to an existing residential home and retail uses.	67.0	59.9	68.7	*Normally Acceptable (Retail) & Conditionally Acceptable (Residential)*

[1] "Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.
[2] Based on the City of South Pasadena General Plan Safety and Noise Element compatibility criteria

Source: Urban Crossroads 2018 (Appendix E-1)

As shown, the CNEL in the City ranges from 52.5 dBA (L5) to 70.2 dBA (L9). The background ambient noise levels in the City are dominated by the transportation-related noise associated with the arterial roadway network and Metro A Line.

Short-Term Noise Measurement Results

Table 3.11-2, Short-Term Noise Level Measurements, on the following page identifies the eight short-term noise levels expressed in L_{eq} at each short-term measurement location, including two light-rail train pass-by events.

TABLE 3.11-2
SHORT-TERM NOISE LEVEL MEASUREMENTS

Location[1]	Adjacent Focus Area	Adjacent Existing Land Use(s)	Description	Duration (mm:ss)	Noise Level (dBA L_{eq})[2]
S1	Ostrich Farm	Office	Ambient noise level on Pasadena Avenue including traffic noise and background office parking lot activity.	10:00	65.1
S2	Downtown Specific Plan	Office & Recreation	Park activities including people playing catch, people talking, and walking. Including traffic noise on El Centro Street.	10:00	58.7
S3	Downtown Specific Plan	Retail	Outdoor restaurant patio dining and traffic noise on Mission Street.	10:00	63.7
S4	Downtown Specific Plan	Office & Retail	People talking outside of retail shops and traffic noise on Mission Street.	10:00	66.0
S5	Downtown Specific Plan	Retail	Truck loading dock activity and traffic noise levels on Monterey Road.	10:00	63.4
S6	Huntington Dr. & Garfield Ave.	Residential	Traffic noise on Garfield Avenue and adjacent local streets.	10:00	68.6
Arroyo Verde Rd./ A Line Pass-By 1	Ostrich Farm	Residential	Southbound Metro A Line train pass-by event.	00:05	79.3
Arroyo Verde Rd./ A Line Pass-By 2	Ostrich Farm	Residential	Northbound Metro A Line train pass-by event.	00:24	77.5
Source: Urban Crossroads 2018 (Appendix E-1)					

As shown, short-term ambient noise levels, not including the A Line measurements, ranged from 58.7 Leq (S2) to 68.6 Leq (S6). Based on the short-term noise levels measured during each event, the train pass-by and rail crossing noise levels range from 77.5 to 79.3 dBA L_{eq} at approximately 20 feet from the trains.

3.11.3 RELEVANT PROGRAMS AND REGULATIONS

Noise Standards

Public agencies have established noise guidelines and standards to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise.

California Noise Insulation Standards

Title 24 of the *California Code of Regulations*, also known as the California Building Standards Code or, more commonly, as the California Building Code (CBC), codifies the State's noise insulation standards applicable to all occupancies throughout the State. Section 1206.4, Allowable Interior Noise Levels, of the CBC states "Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan."

The 2022 California's Green Building Standards Code, also known as CALGreen, contains mandatory measures for non-residential building construction in Section 5.507 on Environmental

Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when non-residential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, and other areas where noise contours are not readily available. If the development falls within an airport or freeway 65 dBA CNEL noise contour, the combined sound transmission class (STC) rating of the wall and roof-ceiling assemblies must be at least 50. For those developments in areas where noise contours are not readily available and the noise level exceeds 65 dBA L_{eq} for any hour of operation, a wall and roof-ceiling combined STC rating of 45 and exterior windows with a minimum STC rating of 40 are required (Section 5.507.4.1.1). Alternatively, if the interior noise levels of non-residential buildings satisfy the performance criteria of 50 dBA L_{eq} (1 hour), then the performance method to meet CALGreen standards defined in Section 5.507.4.2.2 has been met.

City of South Pasadena Safety and Noise Element

The existing Safety and Noise Element of the City of South Pasadena General Plan was adopted to address the health and well-being of its citizens and businesses. The Safety and Noise Element identifies goals and polices related to noise, including Policy 5.1 that defines a noise increase threshold as follows:

Policy 5.1: Consider the noise impacts of new projects involving increases in noisy activities or traffic. An increase of 3 dBA or noise in excess of 65 dBA in sensitive areas shall be considered significant.

In addition, the Safety and Noise Element identifies the following implementing policies and strategies to reduce noise levels in the City, including Strategy 5.5 that defines a sound insulation standard consistent with State standards as follows:

Strategy 5.5: Require sound insulation of all new development adjacent to high noise areas, including arterials and the freeway, to reduce interior noise levels to 45 dBA.

A complete list of the goals, policies, and strategies in the existing Safety and Noise Element are presented in the 2018 Noise Analysis (Appendix E-1).

<u>South Pasadena and Land Use Compatibility</u>

The noise criteria identified in Table Viii-4 of the existing Safety and Noise Element are guidelines to evaluate the land use compatibility of transportation-related noise. The compatibility criteria provide the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise environment.

Single-family residential uses are considered *normally acceptable* with exterior noise levels of up to 60 CNEL and *conditionally acceptable* up to 70 CNEL. Multi-family residential land use is considered *normally acceptable* in exterior noise environments up to 65 CNEL and *conditionally acceptable* up to 70 CNEL. Schools, libraries, and churches are considered *normally acceptable* up to 70 CNEL, as are office buildings and business, commercial and professional uses. Recreational uses are considered *normally acceptable* with exterior noise levels of up to 70 CNEL and *normally unacceptable* from 70 to 80 CNEL.

A *conditionally acceptable* designation indicates that new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use

type is made and needed noise insulation features are incorporated in the design. By comparison, a *normally acceptable* designation indicates that standard construction can occur with no special noise reduction requirements.

Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the retail and office uses that may be constructed pursuant to the Project, stationary-source (operational) noise is typically evaluated against standards established under a city's municipal code.

Chapter 19A, Noise Regulation, of the SPMC establishes exterior noise level limits for stationary noise sources in the City as measured at the adjacent property line. Sections 19A.7(b) and 19A.12 of the SPMC indicate that radios, television sets, machinery, equipment, fans, air conditioning units, and similar devices/equipment shall not generate exterior noise levels in excess of the ambient noise level by more than 5 dBA. Further, amplified sound (e.g., any machine or device for the amplification of the human voice, music, or any other sound) shall not generate noise levels in excess of the ambient noise level by more than 15 dBA. Table 3.11-3, South Pasadena Municipal Code Operational Noise Standards, summaries the exterior noise level standards.

TABLE 3.11-3
SOUTH PASADENA MUNICIPAL CODE OPERATIONAL NOISE STANDARDS

SMPC Section[1]	Title	Exterior Noise Level Standard (dBA)[2]
19A.7(b)	Radios, television sets and similar devices	Ambient + 5 dBA
19A.12	Machinery, equipment, fans, and air-conditioning	Ambient + 5 dBA
19A.21(c)	Regulations (Article 5. Amplified Sound)	Ambient + 15 dBA

SMPC: South Pasadena Municipal Code

1 South Pasadena Municipal Code, Chapter 19A Noise Regulation
2 These standards apply at the property line of the adjacent use.

Source: South Pasadena Municipal Code

Construction Noise Standards

Noise from construction activities is typically evaluated against standards established under a city's municipal code. Section 19A.13(a) of the SMPC indicates that within a residential zone or within 500 feet thereof, construction activities are limited to between 8:00 AM to 7:00 PM Monday through Friday; 9:00 AM to 7:00 PM Saturdays; and 10:00 AM to 6:00 PM Sundays and holidays. However, the City's General Plan and the SPMC do not establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes as "generation of noise levels in excess of standards or as a substantial temporary or periodic noise increase". Therefore, the 2018 Noise Analysis identifies a numeric construction noise level threshold to evaluate these potential impacts. The FTA *Transit Noise and Vibration Impact Assessment* identifies detailed assessment criteria including an eight-hour construction noise level threshold of 80 dBA L_{eq} during daytime at residential (noise-sensitive) uses, and 85 dBA L_{eq} during daytime hours at commercial uses.

Vibration Standards

The following vibration standards are used in the Noise Analysis to assess the potential vibration impacts of future Metro A Line operations on the future development within the focus areas or elsewhere in the City, and the potential operational and construction vibration levels generated by future land uses at adjacent, existing land uses.

On-Site Rail Vibration

The FTA *Transit Noise and Vibration Impact Assessment* identifies ground borne vibration levels for land use categories based on the frequency of rail events. For rapid-transit rail lines such as the Metro A Line, the *frequent event* vibration criteria for residential uses is 72 VdB, and for non-residential primarily daytime-only uses (e.g., office, retail) the vibration criterion is 75 VdB.

Operational and Construction Vibration

The City's General Plan or the SPMC do not identify specific vibration level standards; therefore, Section 12.08.350 of the Los Angeles County Code's root-mean-square (RMS) vibration perception threshold of 0.01 in/sec RMS is used in this analysis. Typically, the human response at the perception threshold for vibration includes annoyance in residential areas when vibration levels expressed in vibration decibels (VdB) approach 75 VdB. The County, however, identifies a vibration perception threshold of 0.01 in/sec RMS. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over a one-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to reduce the range of numbers used to describe human response to vibration. Therefore, the County of Los Angeles standard of 0.01 in/sec in RMS velocity levels is used in the Noise Analysis to assess the human perception of vibration levels due to Project-related construction activities. The Project is not expected to include any specific type of operational vibration sources.

3.11.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse noise impact if it would:

Threshold 3.11a: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

Threshold 3.11b: Result in generation of excessive groundborne vibration or groundborne noise levels;

Threshold 3.11c: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels;

Noise-Sensitive Receivers

Noise level increases resulting from the Project are evaluated based on the Appendix G of the State CEQA Guidelines described above at the closest sensitive receiver locations. Sensitive receiver locations, as defined by the adopted General Plan Safety and Noise Element, include

residences, schools, libraries, hospitals and convalescent homes, and recreational uses. Under CEQA, consideration must be given to the magnitude of the increase, the existing ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. Unfortunately, there is no completely satisfactory way to measure the subjective effects of noise or of the corresponding human reactions of annoyance and dissatisfaction. This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted—the ambient environment. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will typically be judged. As discussed previously, Policy 5.1 of the Safety and Noise Element identifies a 3 dBA increase (permanent) as significant at noise-sensitive land uses. In addition, Project-generated noise levels shall not exceed 65 dBA at noise-sensitive uses. The existing General Plan Policy 5.1 criteria used in the 2018 Noise Analysis are based on a cumulative noise exposure metric, the average-daily noise level (i.e., CNEL), to assess the without and with Project traffic noise levels at adjacent sensitive land uses.

Significance Criteria Summary

The following summarizes the numeric thresholds used in the 2018 Noise Analysis and this section. Noise impacts shall be considered significant if any of the thresholds shown in Table 3.11-4, Significance Criteria Summary, occurs as a direct result of the construction or operation of future land uses pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element.

TABLE 3.11-4
SIGNIFICANCE CRITERIA SUMMARY

Analysis	Receiving Land Use	Condition(s)	Significance Criteria
Traffic (Off-Site/ Existing Uses)[1]	Noise-Sensitive	Exterior Noise Level Standard	65 dBA CNEL
		Long-Term Noise Level Increase	≥ 3 dBA CNEL Project increase
Traffic (On-Site/ Proposed Uses)[2]	Residential	Exterior Noise Level Standard	65 dBA CNEL
		Interior Noise Level Standard	45 dBA CNEL
		On-Site Vibration Level Threshold[3]	72 VdB
	Non-Residential		75 VdB
Operational	All[4]	Exterior Noise Level Standard	Ambient + 5 dBA
		Amplified Sound	Ambient + 15 dBA
	Noise-Sensitive	Vibration Level Threshold[5]	0.01 in/sec RMS
Construction	Noise-Sensitive	Residential Noise Level Threshold[3]	80 dBA L_{eq} (8-Hour)
		Commercial Noise Level Threshold[3]	85 dBA L_{eq} (8-Hour)
		Vibration Level Threshold[5]	0.01 in/sec RMS

Sources:
1 City of South Pasadena General Plan Safety and Noise Element, Policy 5.1.
2 City of South Pasadena General Plan Safety & Noise Element, Policy 5.1 & Strategy 5.5.
3 Federal Transportation Authority, Transit Noise and Vibration Impact Assessment.
4 City of South Pasadena Municipal Code, Sections 19A.7(b), 19A.12, and 19.21(c) (Appendix 3.1).
5 Los Angeles County Code, Section 12.08.350

Source: Urban Crossroads 2018 (Appendix E-1)

3.11.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P6.6 Reduce the prevalence of unpleasant noise and smell.

A6.6a Manage relationship between homes and major noise sources through zoning and environmental review and design measures.

A6.6b Provide educational materials and programs that inform the public about noise and pollution risks of gas-powered outdoor maintenance and encourage use of alternative environmentally sensitive solutions.

A6.6c Enforce ordinance prohibiting use of gas-powered leaf blowers.

P6.7 Minimize noise impacts to ensure that noise does not detract from South Pasadena's quality of life.

A6.7a Use the Land Use Compatibility Noise compatibility matrix (Table B6.4), the Future Noise Contour Map (Figure B6.5) and the South Pasadena Municipal Code to evaluate land use decisions to mitigate unnecessary noise impacts or discourage further unmitigated noise inducing developments.

A6.7b Require development projects to implement mitigation measures, where necessary, to reduce exterior and interior noise levels to meet adopted standards and criteria.

A6.7c For new residential developments within 50 feet of the Metro A Line, require a vibration study to identify all reasonable and feasible noise mitigation measures.

A6.7d Require mixed-use structures to minimize the transfer of noise from commercial uses to residential uses.

A6.7e Discourage through traffic in neighborhoods through noise-attenuating roadway materials and modifications to street design.

A6.7f Minimize stationary noise impacts on sensitive receptors, and require control of noise from construction activities, private developments/residences, landscaping activities, and special events.

A6.7g Maintain and enforce standards for construction noise so that it does not adversely impact noise-sensitive uses.

Downtown Specific Plan Update

P6.10 Maintain noise levels that are appropriate for nearby residential uses.

A6.10 Manage relationship between homes and major noise sources through zoning and environmental review and design measures.

2021–2029 Housing Element

There are no Housing Element goals or policies related to noise.

3.11.6 ENVIRONMENTAL IMPACTS

Threshold 3.11a: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction (Short-term and Periodic Noise)

Noise generated by the construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that, when combined, can reach high levels. To describe the construction noise levels that may be generated by implementation of future development projects, measurements were collected for similar activities at several construction sites by Urban Crossroads for use in noise analyses. Table 3.11-5, Construction Reference Noise Levels, on the following page provides a summary of construction reference noise level measurements. Since the reference noise levels were collected at varying distances, all construction noise level measurements were adjusted to describe a common reference distance of 50 feet. Noise levels generated by heavy construction equipment, not including pile driving equipment, can range from approximately 68 dBA to in excess of 80 dBA when measured at 50 feet. Hard site conditions are used in the construction noise analysis, which result in noise levels that attenuate (or decrease) at a rate of 6 dBA for each doubling of distance from a point source (i.e., construction equipment).

Mobile construction equipment, such as the reference dozer pass-by, typically generates the highest construction noise levels during construction activities. As such, the highest construction reference noise level of 79.6 dBA L_{eq} is used in this program-level analysis to determine potential impacts at sensitive receiver locations adjacent to development within the focus areas. Pile driving activity is represented by the FHWA Roadway Construction Noise Model (RCNM) reference noise level of 94.0 dBA L_{eq} at 50 feet and is used in this analysis to determine potential impacts for future development that could require this construction method. Table 3.11-6, Unmitigated Construction Noise Levels, and Table 3.11-7, Unmitigated Pile Driving Noise Levels, on the following pages summarize the estimated highest noise levels generated by unmitigated typical construction activity and pile driving activity, respectively, at various distances from each of the long-term noise measurement locations identified on Exhibit 3.11-2.

As shown in Table 3.11-6, the highest reference construction noise level of 79.6 dBA L_{eq} at 50 feet (see Table 3.11-5) is expected to satisfy the FTA 80 dBA L_{eq} residential and 85 dBA L_{eq} commercial 8-hour construction noise level thresholds at distances greater than 50 feet. However, at distances of 50 feet or less, Project construction noise levels could exceed the FTA thresholds at nearby receiver locations. Therefore, construction noise levels at receiver locations within 50 feet of construction activities, such as existing residential, retail, and office uses in the focus areas, are considered a potentially significant noise impact.

TABLE 3.11-5
CONSTRUCTION REFERENCE NOISE LEVELS

Noise Source	Reference Distance From Source (Feet)	Reference Noise Levels (dBA L_{eq})	
		@ Reference Distance	@ 50 feet[8]
Truck Pass-Bys & Dozer Activity[1]	30	63.6	59.2
Dozer Activity[1]	30	68.6	64.2
Construction Vehicle Maintenance Activities[2]	30	71.9	67.5
Foundation Trenching[2]	30	72.6	68.2
Rough Grading Activities[2]	30	77.9	73.5
Framing[3]	30	66.7	62.3
Water Truck Pass-By & Backup Alarm[4]	30	76.3	71.9
Dozer Pass-By[4]	30	84.0	79.6
Two Scrapers & Water Truck Pass-By[4]	30	83.4	79.0
Two Scrapers Pass-By[4]	30	83.7	79.3
Scraper, Water Truck, & Dozer Activity[4]	30	79.7	75.3
Concrete Mixer Truck Movements[5]	50	71.2	71.2
Concrete Paver Activities[5]	30	70.0	65.6
Concrete Mixer Pour & Paving Activities[5]	30	70.3	65.9
Concrete Mixer Backup Alarms & Air Brakes[5]	50	71.6	71.6
Concrete Mixer Pour Activities[5]	50	67.7	67.7
Forklift, Jackhammer, & Metal Truck Bed Loading[6]	50	67.9	67.9
Pile Driver (Impact)[7]	50	94.0	94.0

Sources:
1 As measured by Urban Crossroads, Inc. on 10/14/15 at a business park construction site located at the northwest corner of Barranca Parkway and Alton Parkway in the City of Irvine.
2 As measured by Urban Crossroads, Inc. on 10/20/15 at a construction site located in Rancho Mission Viejo.
3 As measured by Urban Crossroads, Inc. on 10/20/15 at a residential construction site located in Rancho Mission Viejo.
4 As measured by Urban Crossroads, Inc. on 10/30/15 during grading operations within an industrial construction site located in the City of Ontario.
5 Reference noise level measurements were collected from a nighttime concrete pour at an industrial construction site, located at 27334 San Bernardino Avenue in the City of Redlands, between 1:00 a.m. to 2:00 a.m. on 7/1/15.
6 As measured by Urban Crossroads, Inc. on 9/9/16 during the demolition of an existing parking lot at 41 Corporate Park in Irvine.
7 Source: FHWA Roadway Construction Noise Model, January 2006.
8 Reference noise levels are calculated at 50 feet using a drop off rate of 6 dBA per doubling of distance (point source).

Source: Urban Crossroads 2018. (Appendix E-1)

TABLE 3.11-6
UNMITIGATED CONSTRUCTION NOISE LEVELS

Location[1]	Existing Land Uses at Location	Highest Project Construction Noise Levels at Screening Distance[2]					Threshold[3]	Threshold Exceeded at Screening Distance?[4]				
		50'	100'	200'	400'	800'		50'	100'	200'	400'	800'
L1	Office	79.6	73.6	67.6	61.6	55.6	85.0	No	No	No	No	No
L2	Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L3	Office & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L4	Retail & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L5	Public & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L6	Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L7	Office, Retail, & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L8	Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L9	Retail & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L10	Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L11	Office & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L12	Office & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No
L13	Office	79.6	73.6	67.6	61.6	55.6	85.0	No	No	No	No	No
L14	Retail & Residential	79.6	73.6	67.6	61.6	55.6	80.0	No	No	No	No	No

[1] Ambient noise level measurement locations as shown on Exhibit 3.11-2.
[2] Highest unmitigated reference construction noise level, as shown on Table 3.11-5.
[3] Significance criteria (see Table 3.11-4).
[4] Do the unmitigated construction noise levels exceed the threshold?

Source: Urban Crossroads 2018. (Appendix E-1)

TABLE 3.11-7
UNMITIGATED PILE DRIVING NOISE LEVELS

Location[1]	Existing Land Uses at Location	Highest Project Construction Noise Levels at Screening Distance[2]					Threshold[3]	Threshold Exceeded at Screening Distance?[4]				
		50'	100'	200'	400'	800'		50'	100'	200'	400'	800'
L1	Office	94.0	88.0	82.0	76.0	70.0	85.0	Yes	Yes	No	No	No
L2	Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L3	Office & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L4	Retail & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L5	Public & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L6	Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L7	Office, Retail, & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L8	Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L9	Retail & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L10	Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L11	Office & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L12	Office & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No
L13	Office	94.0	88.0	82.0	76.0	70.0	85.0	Yes	Yes	No	No	No
L14	Retail & Residential	94.0	88.0	82.0	76.0	70.0	80.0	Yes	Yes	Yes	No	No

1 Ambient noise level measurement locations as shown on Exhibit 3.11-2.
2 Highest unmitigated reference construction noise level, as shown on Table 3.11-5.
3 Significance criteria (see Table 3.11-4).
4 Do the unmitigated construction noise levels exceed the threshold?

Source: Urban Crossroads 2018. (Appendix E-1)

As shown in Table 3.11-7, for development requiring pile driving, construction noise levels are anticipated to exceed the FTA 80 dBA L_{eq} residential and 85 dBA L_{eq} commercial 8-hour construction noise level thresholds at distances of 200 feet or less. Therefore, pile driving construction noise levels at receiver locations within 200 feet of construction activities are considered a potentially significant noise impact.

Therefore, MMs NOI-4 and NOI-7 prescribe several means to reduce noise level from both typical construction activity and pile driving activity during future development in the focus areas or elsewhere in the City. However, even with application of the construction noise reduction measures identified in the Noise Analysis, it is anticipated the construction and/or pile driving noise levels at nearby receiver locations could exceed the FTA construction noise level thresholds. Therefore, construction-related noise levels for development requiring pile driving are considered a significant and unavoidable impact.

Operation (Long-Term Future Noise)

Traffic Noise

As discussed above, noise level measurements were taken in February 2018 during typical weekday conditions at sensitive receiver locations in the Project study area. These baseline noise level measurements are used in this analysis as the COVID-19 pandemic was affecting traffic and light rail use at the time this updated analysis was prepared. Table 3.11-2 above presents the baseline, long-term noise levels at 14 locations throughout the City. Consistent with the analysis in Section 3.14, Transportation, of this PEIR, the significance determination for this analysis is based on comparison of the traffic noise generation from the "Future (2040) without Project" scenario and to the "Future (2040) with Project" scenario across approximately 170 street segments based on trip generation figures provided by Iteris as part of the transportation analysis (refer to Section 3.14 for more details). In this way, the PEIR analyzes the portion of traffic generated just by the Project, and therefore the Project-specific impact, with an apples-to-apples methodology that encompasses the whole of the City.

As discussed above, noise contours were developed to assess the off-site, traffic-related, CNEL noise levels associated with future development under the General Plan and DTSP Update & 2021–2029 Housing Element. Noise contours represent the distance to noise levels of a constant value and are measured from the center of the roadway for the 60, 65, and 70 dBA noise levels, and do not consider the effect of any existing noise barriers or topography that may attenuate ambient noise levels. In addition, because the noise contours reflect modeling of vehicular noise on area roadways, they do not reflect noise contributions from the surrounding stationary noise sources within the Project study area. These contours also do not take into account the effect of any noise barriers, topography, or final roadway grades that may reduce traffic noise levels, providing a conservative analysis of traffic-related noise generation.

Noise contours were developed for future (2040) conditions without and with the Project, consistent with the transportation analysis prepared by Iteris. These scenarios refer to the traffic noise generation in the build out year (2040) without and with the proposed Project plus ambient growth. Table 3.11-8, Future (2040) without Project Traffic Noise Contours, presents the estimated noise levels in the future without Project scenario.

TABLE 3.11-8
FUTURE (2040) WITHOUT PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway Segment	Noise Level at 50 Feet (dBA CNEL)	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
13876	Pasadena Fwy	79.4	981	455	211
14030	Pasadena Fwy	79.9	1065	494	229
14036	Pasadena Fwy	77.6	749	348	161
14316	Pasadena Fwy	79.9	1067	495	230
14381	Pasadena Fwy	80.5	1157	537	249
14596	Pasadena Fwy	80.2	1107	514	238
88512	Pasadena Fwy	78.2	814	378	175
92026	Ramp-Other	62.3	71	33	15
92053	Ramp-Other	69.5	215	100	46
92104	Ramp-Other	62.8	77	36	17

TABLE 3.11-8
FUTURE (2040) WITHOUT PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway Segment	Noise Level at 50 Feet (dBA CNEL)	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
92181	Ramp-Other	70.4	247	115	53
92269	Ramp-Other	36.3	1	1	0
95509	Ramp-Other	59.8	48	22	10
95511	Ramp-Other	64.2	95	44	20
97322	Fair Oaks Ave	67.6	161	75	35
97323	Fair Oaks Ave	71.0	272	126	59
97324	Fair Oaks Ave	69.8	224	104	48
97526	Bridewell St	29.5	0	0	0
97601	Marmion Way	60.1	51	24	11
108176	Monterey Rd	64.4	98	45	21
108352	York Blvd	69.6	218	101	47
108474	Monterey Rd	65.8	122	57	26
108484	Pasadena Ave	69.6	218	101	47
108592	Pasadena Ave	70.6	253	117	54
108667	Pasadena Ave	65.0	108	50	23
108668	Monterey Rd	66.5	135	63	29
108752	Mission St	67.5	158	74	34
108938	Orange Grove Ave	63.6	87	40	19
108941	Orange Grove Ave	66.8	141	66	30
108943	Orange Grove Ave	66.4	134	62	29
109115	Huntington Dr	71.6	297	138	64
109190	Fremont Ave	66.6	138	64	30
109191	Fremont Ave	65.3	113	53	24
109192	Monterey Rd	69.0	200	93	43
109195	Fremont Ave	66.5	136	63	29
109196	Mission St	65.9	123	57	26
109203	Huntington Dr	71.9	309	143	67
109204	Fremont Ave	60.1	51	24	11
109205	Fremont Ave	68.6	189	88	41
109206	Huntington Dr	70.8	263	122	57
109240	Huntington Dr	73.0	367	170	79
109245	Fair Oaks Ave	70.7	257	119	55
109246	Huntington Dr	72.9	365	169	79
109253	Fair Oaks Ave	70.9	268	124	58
109254	Fair Oaks Ave	67.6	160	74	34
109255	Huntington Dr	68.9	195	91	42
109256	Fair Oaks Ave	71.2	278	129	60
109257	Fair Oaks Ave	66.7	139	65	30
109258	Fair Oaks Ave	71.5	291	135	63
109259	Fair Oaks Ave	69.8	226	105	49
109260	Monterey Rd	69.8	226	105	49
109261	Fair Oaks Ave	69.8	225	105	49
109276	Monterey Rd	63.9	91	42	20
109277	E Huntington Dr	70.9	268	124	58

TABLE 3.11-8
FUTURE (2040) WITHOUT PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway Segment	Noise Level at 50 Feet (dBA CNEL)	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
109323	Huntington Dr	69.4	212	98	46
109324	Fair Oaks Ave	66.9	145	67	31
124760	Arroyo Dr	64.0	92	43	20
126106	Pasadena Fwy	79.4	980	455	211
129934	E Huntington Dr	70.7	260	121	56
130014	Fair Oaks Ave	70.4	247	115	53
130015	Fair Oaks Ave	67.9	168	78	36
145680	Mission St	63.5	85	39	18
145694	Monterey Rd	61.9	66	31	14
145696	Mission St	61.1	59	27	13
145697	Garfield Ave	61.8	66	31	14
1643138	Fair Oaks Ave	72.8	357	166	77
1643140	W State St	57.6	35	16	7
2663575	Pasadena Fwy	78.1	804	373	173
2665469	Mission St	68.0	171	80	37
2665470	Mission St	63.9	92	43	20
2665471	Mission St	65.4	114	53	25
2673636	Huntington Dr	71.8	308	143	66
2673637	Huntington Dr	71.7	300	139	65
2673638	Ramona Ave	44.3	4	2	1
2673639	Ramona Ave	45.7	6	3	1
2673642	Pine St	45.7	6	3	1
2673645	Meridian Ave	64.5	99	46	21
2673647	Meridian Ave	64.3	97	45	21
2673649	Meridian Ave	64.6	102	47	22
2673650	Meridian Ave	64.3	97	45	21
2673651	Meridian Ave	65.2	111	52	24
2673653	Monterey Rd	65.6	118	55	26
2673654	Brunswick Ave	63.1	81	38	17
2673655	Hill Dr	63.5	85	40	18
2673656	Hill Dr	62.5	73	34	16
2673657	Camino Del Sol	59.2	44	20	9
2673658	Camino Del Sol	59.7	48	22	10
2673659	Via Del Rey	59.2	45	21	10
2673660	Via Del Rey	63.0	79	37	17
2673661	Via Del Rey	63.0	79	37	17
2673662	Monterey Rd	70.0	232	108	50
2673663	Via Del Rey	63.2	82	38	18
2673665	El Centro St	60.2	51	24	11
2673666	Fremont Ave	66.6	138	64	30
2673667	El Centro St	51.9	15	7	3
2673668	Fair Oaks Ave	71.8	308	143	66
2673669	El Centro St	11.7	0	0	0
2673670	El Centro St	15.6	0	0	0

TABLE 3.11-8
FUTURE (2040) WITHOUT PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway Segment	Noise Level at 50 Feet (dBA CNEL)	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
2673671	Mission St	62.0	68	31	15
2673672	Brent Ave	15.6	0	0	0
2673673	Mission St	61.8	66	31	14
2673674	Park Ave	57.8	36	17	8
2673675	Hope St	57.5	34	16	7
2673676	Park Ave	57.9	36	17	8
2673677	Grevelia St	61.3	61	28	13
2673678	Clark Pl	62.7	76	35	16
2673679	Garfield Ave	61.4	62	29	13
2673680	Raymondale Dr	48.2	8	4	2
2673683	Raymondale Dr	48.8	9	4	2
2673684	W State St	57.9	36	17	8
2673685	Fair Oaks Ave	73.0	367	171	79
2673686	Columbia St	62.2	70	33	15
2673687	Fremont Ave	62.0	68	32	15
2673688	Columbia St	61.7	65	30	14
2673689	Columbia St	63.9	92	42	20
2673690	Columbia St	63.9	91	42	20
2673716	Fair Oaks Ave	72.0	316	147	68
2673718	Oak St	45.2	5	2	1
2673719	Fair Oaks Ave	72.4	334	155	72
2673720	Oak St	44.2	4	2	1
2673721	Oak St	45.1	5	2	1
2673722	Oak St	45.0	5	2	1
2673723	E Huntington Dr	70.5	252	117	54
2673724	Fletcher Ave	45.1	5	2	1
2675727	Meridian Ave	64.7	103	48	22
2675835	E Huntington Dr	70.4	247	115	53
2675836	No Name	46.4	6	3	1
2691501	Collis Ave	65.1	110	51	24
2691507	Hill Dr	64.4	98	46	21
2691533	Monterey Rd	67.7	163	76	35
2691588	Pasadena Ave	70.7	257	119	55
2691593	Arroyo Dr	64.4	99	46	21
2691595	Arroyo Dr	64.0	92	43	20
2691597	Mission St	67.9	168	78	36
2691599	San Pasqual Ave	59.6	47	22	10
2691703	Fremont Ave	67.4	156	72	34
2691707	Fremont Ave	66.5	136	63	29
2691709	Fremont Ave	66.3	132	61	28
2691711	Fair Oaks Ave	72.4	333	155	72
2691713	E Huntington Dr	70.5	251	117	54
2691757	Garfield Ave	62.7	76	35	16
2691773	Monterey Rd	70.2	240	111	52

TABLE 3.11-8
FUTURE (2040) WITHOUT PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway Segment	Noise Level at 50 Feet (dBA CNEL)	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
2691781	Fremont Ave	64.8	105	49	23
2691783	Fremont Ave	64.9	106	49	23
2691785	Fair Oaks Ave	70.2	240	111	52
2691787	Monterey Rd	64.2	96	44	21
2691789	Mission St	63.4	84	39	18
2691805	Monterey Rd	64.0	93	43	20
2753918	Mission St	67.7	164	76	35
2757439	Fair Oaks Ave	68.3	180	84	39
2757440	Grevelia St	60.9	57	27	12
2757452	Pasadena Ave	64.5	99	46	21
2757453	El Centro St	60.9	57	27	12
2757454	S Grand Ave	59.0	43	20	9
2757478	Hill Dr	61.9	67	31	15
2757479	Hill Dr	62.2	70	32	15
2757492	Alpha St	63.7	88	41	19
2757493	Camino Lindo	63.7	88	41	19
2757494	Flores De Oro	64.2	95	44	20
2757495	E Huntington Dr	70.1	235	109	51
2757496	Marengo Ave	64.9	106	49	23
2757497	Marengo Ave	64.5	100	46	22
2757498	Marengo Ave	64.3	96	45	21
2757499	Marengo Ave	64.4	98	45	21
2757500	Marengo Ave	64.3	97	45	21
2757502	Meridian Ave	64.9	106	49	23
2762124	Ramp-Other	61.1	59	27	13

Fwy: Freeway; Ave: Avenue; St: Street; Rd: Road; Blvd: Boulevard; Dr: Drive; E: East; W: West

Source: Psomas 2023, modeling inputs and results for this scenario are presented in Appendix E-2

Table 3.11-9, Future (2040) with Project Traffic Noise Contours, presents the estimated noise levels in the future with Project scenario.

TABLE 3.11-9
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway	Noise Level at 50 Feet	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
13876	Pasadena Fwy	79.4	985	457	212
14030	Pasadena Fwy	80.0	1074	498	231
14036	Pasadena Fwy	77.7	752	349	162
14316	Pasadena Fwy	80.0	1074	499	231
14381	Pasadena Fwy	80.5	1162	540	250
14596	Pasadena Fwy	80.2	1114	517	240
88512	Pasadena Fwy	78.2	820	380	177
92026	Ramp-Other	62.3	71	33	15
92053	Ramp-Other	69.6	217	101	47
92104	Ramp-Other	63.1	80	37	17
92181	Ramp-Other	70.4	249	115	54
92269	Ramp-Other	40.3	2	1	1
95509	Ramp-Other	60.0	50	23	11
95511	Ramp-Other	64.2	96	45	21
97322	Fair Oaks Ave	67.6	161	75	35
97323	Fair Oaks Ave	71.1	274	127	59
97324	Fair Oaks Ave	69.8	225	104	48
97526	Bridewell St	33.6	1	0	0
97601	Marmion Way	60.4	53	25	11
108176	Monterey Rd	64.7	102	47	22
108352	York Blvd	69.6	220	102	47
108474	Monterey Rd	66.0	125	58	27
108484	Pasadena Ave	69.6	219	102	47
108592	Pasadena Ave	70.5	252	117	54
108667	Pasadena Ave	65.5	116	54	25
108668	Monterey Rd	66.5	136	63	29
108752	Mission St	67.6	161	75	35
108938	Orange Grove Ave	63.8	89	41	19
108941	Orange Grove Ave	66.9	143	66	31
108943	Orange Grove Ave	66.5	135	63	29
109115	Huntington Dr	71.8	307	142	66
109190	Fremont Ave	66.7	139	64	30
109191	Fremont Ave	65.4	114	53	25
109192	Monterey Rd	69.1	203	94	44
109195	Fremont Ave	66.5	136	63	29
109196	Mission St	66.0	126	58	27
109203	Huntington Dr	72.1	319	148	69
109204	Fremont Ave	60.4	53	25	11
109205	Fremont Ave	68.6	188	87	41
109206	Huntington Dr	71.1	275	127	59
109240	Huntington Dr	73.3	386	179	83

TABLE 3.11-9
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway	Noise Level at 50 Feet	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
109245	Fair Oaks Ave	70.9	268	125	58
109246	Huntington Dr	73.2	379	176	82
109253	Fair Oaks Ave	71.3	282	131	61
109254	Fair Oaks Ave	67.2	151	70	33
109255	Huntington Dr	69.2	205	95	44
109256	Fair Oaks Ave	71.4	290	135	62
109257	Fair Oaks Ave	66.3	132	61	28
109258	Fair Oaks Ave	71.5	294	136	63
109259	Fair Oaks Ave	69.9	228	106	49
109260	Monterey Rd	70.0	234	108	50
109261	Fair Oaks Ave	69.9	229	106	49
109276	Monterey Rd	64.1	94	43	20
109277	E Huntington Dr	70.9	268	124	58
109323	Huntington Dr	69.7	222	103	48
109324	Fair Oaks Ave	66.6	137	64	29
124760	Arroyo Dr	64.3	96	45	21
126106	Pasadena Fwy	79.4	988	459	213
129934	E Huntington Dr	70.8	263	122	57
130014	Fair Oaks Ave	70.5	252	117	54
130015	Fair Oaks Ave	68.1	172	80	37
145680	Mission St	63.4	85	39	18
145694	Monterey Rd	61.9	67	31	14
145696	Mission St	61.1	59	27	13
145697	Garfield Ave	61.8	66	31	14
1643138	Fair Oaks Ave	72.8	358	166	77
1643140	W State St	57.8	36	17	8
2663575	Pasadena Fwy	78.1	808	375	174
2665469	Mission St	68.2	175	81	38
2665470	Mission St	64.1	93	43	20
2665471	Mission St	65.5	117	54	25
2673636	Huntington Dr	72.0	317	147	68
2673637	Huntington Dr	71.9	310	144	67
2673638	Ramona Ave	44.5	5	2	1
2673639	Ramona Ave	44.2	4	2	1
2673642	Pine St	44.2	4	2	1
2673645	Meridian Ave	64.5	100	46	21
2673647	Meridian Ave	64.4	98	45	21
2673649	Meridian Ave	64.7	102	47	22
2673650	Meridian Ave	64.5	100	47	22
2673651	Meridian Ave	65.3	114	53	24
2673653	Monterey Rd	65.8	121	56	26
2673654	Brunswick Ave	63.2	82	38	18
2673655	Hill Dr	63.5	86	40	19
2673656	Hill Dr	62.6	74	34	16

TABLE 3.11-9
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway	Noise Level at 50 Feet	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
2673657	Camino Del Sol	59.4	46	21	10
2673658	Camino Del Sol	59.9	49	23	11
2673659	Via Del Rey	59.5	46	21	10
2673660	Via Del Rey	63.3	83	38	18
2673661	Via Del Rey	63.3	83	38	18
2673662	Monterey Rd	70.0	233	108	50
2673663	Via Del Rey	63.5	86	40	19
2673665	El Centro St	61.7	65	30	14
2673666	Fremont Ave	66.7	139	65	30
2673667	El Centro St	53.3	18	8	4
2673668	Fair Oaks Ave	72.0	314	146	68
2673669	El Centro St	24.2	0	0	0
2673670	El Centro St	16.2	0	0	0
2673671	Mission St	62.0	68	31	15
2673672	Brent Ave	16.1	0	0	0
2673673	Mission St	61.9	67	31	14
2673674	Park Ave	59.2	44	21	10
2673675	Hope St	58.9	42	20	9
2673676	Park Ave	59.3	45	21	10
2673677	Grevelia St	61.3	61	28	13
2673678	Clark Pl	62.7	75	35	16
2673679	Garfield Ave	61.4	62	29	13
2673680	Raymondale Dr	48.2	8	4	2
2673683	Raymondale Dr	48.8	9	4	2
2673684	W State St	58.1	37	17	8
2673685	Fair Oaks Ave	73.1	371	172	80
2673686	Columbia St	61.9	67	31	14
2673687	Fremont Ave	62.0	68	31	15
2673688	Columbia St	61.4	62	29	13
2673689	Columbia St	64.1	94	44	20
2673690	Columbia St	64.1	94	44	20
2673716	Fair Oaks Ave	72.1	320	148	69
2673718	Oak St	50.2	11	5	2
2673719	Fair Oaks Ave	72.5	339	157	73
2673720	Oak St	50.6	12	5	3
2673721	Oak St	45.5	5	3	1
2673722	Oak St	48.0	8	4	2
2673723	E Huntington Dr	70.6	255	118	55
2673724	Fletcher Ave	48.1	8	4	2
2675727	Meridian Ave	64.7	103	48	22
2675835	E Huntington Dr	70.5	250	116	54
2675836	No Name	49.7	10	5	2
2691501	Collis Ave	65.2	112	52	24
2691507	Hill Dr	64.4	99	46	21

TABLE 3.11-9
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTOURS

ID#	Roadway	Noise Level at 50 Feet	Distance from Roadway Centerline to 60 dBA CNEL Contour	Distance from Roadway Centerline to 65 dBA CNEL Contour	Distance from Roadway Centerline to 70 dBA CNEL Contour
2691533	Monterey Rd	67.8	165	76	35
2691588	Pasadena Ave	70.7	257	119	55
2691593	Arroyo Dr	64.7	103	48	22
2691595	Arroyo Dr	64.1	94	44	20
2691597	Mission St	68.1	173	80	37
2691599	San Pasqual Ave	59.7	48	22	10
2691703	Fremont Ave	67.4	155	72	34
2691707	Fremont Ave	66.6	137	64	30
2691709	Fremont Ave	66.4	133	62	29
2691711	Fair Oaks Ave	72.4	336	156	72
2691713	E Huntington Dr	70.6	253	117	54
2691757	Garfield Ave	62.7	76	35	16
2691773	Monterey Rd	70.3	243	113	52
2691781	Fremont Ave	64.8	105	49	23
2691783	Fremont Ave	64.9	106	49	23
2691785	Fair Oaks Ave	70.2	241	112	52
2691787	Monterey Rd	64.2	96	44	21
2691789	Mission St	63.5	85	40	18
2691805	Monterey Rd	64.0	92	43	20
2753918	Mission St	67.9	168	78	36
2757439	Fair Oaks Ave	68.4	181	84	39
2757440	Grevelia St	60.9	57	27	12
2757452	Pasadena Ave	64.8	105	49	23
2757453	El Centro St	62.5	73	34	16
2757454	S Grand Ave	59.7	48	22	10
2757478	Hill Dr	62.0	68	31	15
2757479	Hill Dr	62.2	70	32	15
2757492	Alpha St	63.9	92	42	20
2757493	Camino Lindo	64.0	92	43	20
2757494	Flores De Oro	64.5	99	46	21
2757495	E Huntington Dr	70.1	237	110	51
2757496	Marengo Ave	65.0	107	50	23
2757497	Marengo Ave	65.2	111	51	24
2757498	Marengo Ave	64.3	97	45	21
2757499	Marengo Ave	64.9	106	49	23
2757500	Marengo Ave	64.5	100	47	22
2757502	Meridian Ave	65.0	107	50	23
2762124	Ramp-Other	61.0	59	27	13

Fwy: Freeway; Ave: Avenue; St: Street; Rd: Road; Blvd: Boulevard; Dr: Drive; E: East; W: West

Source: Psomas 2023, modeling inputs and results for this scenario are presented in Appendix E-2

Traffic Noise Contributions

Table 3.11-10, Future (2040) with Project Traffic Noise Contributions, beginning on the following page presents the Project-generated noise level increases on existing land uses due solely to traffic (i.e., off-site noise).

TABLE 3.11-10
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTRIBUTIONS

ID	Road	Noise Level (dBA CNEL at 50 Feet)			Exceeds Thresholds?
		No Project	With Project	Project Change	>3 dBA Increase & Exceeds 65 dBA CNEL
13876	Pasadena Fwy	79.4	79.4	0.0	No
14030	Pasadena Fwy	79.9	80.0	0.1	No
14036	Pasadena Fwy	77.6	77.7	0.0	No
14316	Pasadena Fwy	79.9	80.0	0.0	No
14381	Pasadena Fwy	80.5	80.5	0.0	No
14596	Pasadena Fwy	80.2	80.2	0.0	No
88512	Pasadena Fwy	78.2	78.2	0.0	No
92026	Ramp-Other	62.3	62.3	0.0	No
92053	Ramp-Other	69.5	69.6	0.0	No
92104	Ramp-Other	62.8	63.1	0.3	No
92181	Ramp-Other	70.4	70.4	0.0	No
92269	Ramp-Other	36.3	40.3	4.1	No
95509	Ramp-Other	59.8	60.0	0.2	No
95511	Ramp-Other	64.2	64.2	0.1	No
97322	Fair Oaks Ave	67.6	67.6	0.0	No
97323	Fair Oaks Ave	71.0	71.1	0.0	No
97324	Fair Oaks Ave	69.8	69.8	0.0	No
97526	Bridewell St	29.5	33.6	4.1	No
97601	Marmion Way	60.1	60.4	0.3	No
108176	Monterey Rd	64.4	64.7	0.3	No
108352	York Blvd	69.6	69.6	0.1	No
108474	Monterey Rd	65.8	66.0	0.2	No
108484	Pasadena Ave	69.6	69.6	0.0	No
108592	Pasadena Ave	70.6	70.5	0.0	No
108667	Pasadena Ave	65.0	65.5	0.5	No
108668	Monterey Rd	66.5	66.5	0.1	No
108752	Mission St	67.5	67.6	0.1	No
108938	Orange Grove Ave	63.6	63.8	0.2	No
108941	Orange Grove Ave	66.8	66.9	0.1	No
108943	Orange Grove Ave	66.4	66.5	0.0	No
109115	Huntington Dr	71.6	71.8	0.2	No
109190	Fremont Ave	66.6	66.7	0.1	No
109191	Fremont Ave	65.3	65.4	0.1	No
109192	Monterey Rd	69.0	69.1	0.1	No
109195	Fremont Ave	66.5	66.5	0.0	No
109196	Mission St	65.9	66.0	0.2	No

TABLE 3.11-10
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTRIBUTIONS

ID	Road	Noise Level (dBA CNEL at 50 Feet)			Exceeds Thresholds?
		No Project	With Project	Project Change	>3 dBA Increase & Exceeds 65 dBA CNEL
109203	Huntington Dr	71.9	72.1	0.2	No
109204	Fremont Ave	60.1	60.4	0.2	No
109205	Fremont Ave	68.6	68.6	0.0	No
109206	Huntington Dr	70.8	71.1	0.3	No
109240	Huntington Dr	73.0	73.3	0.3	No
109245	Fair Oaks Ave	70.7	70.9	0.3	No
109246	Huntington Dr	72.9	73.2	0.3	No
109253	Fair Oaks Ave	70.9	71.3	0.3	No
109254	Fair Oaks Ave	67.6	67.2	-0.4	No
109255	Huntington Dr	68.9	69.2	0.3	No
109256	Fair Oaks Ave	71.2	71.4	0.3	No
109257	Fair Oaks Ave	66.7	66.3	-0.4	No
109258	Fair Oaks Ave	71.5	71.5	0.1	No
109259	Fair Oaks Ave	69.8	69.9	0.1	No
109260	Monterey Rd	69.8	70.0	0.2	No
109261	Fair Oaks Ave	69.8	69.9	0.1	No
109276	Monterey Rd	63.9	64.1	0.2	No
109277	E Huntington Dr	70.9	70.9	0.0	No
109323	Huntington Dr	69.4	69.7	0.3	No
109324	Fair Oaks Ave	66.9	66.6	-0.4	No
124760	Arroyo Dr	64.0	64.3	0.3	No
126106	Pasadena Fwy	79.4	79.4	0.1	No
129934	E Huntington Dr	70.7	70.8	0.1	No
130014	Fair Oaks Ave	70.4	70.5	0.1	No
130015	Fair Oaks Ave	67.9	68.1	0.2	No
145680	Mission St	63.5	63.4	0.0	No
145694	Monterey Rd	61.9	61.9	0.1	No
145696	Mission St	61.1	61.1	0.0	No
145697	Garfield Ave	61.8	61.8	0.1	No
1643138	Fair Oaks Ave	72.8	72.8	0.0	No
1643140	W State St	57.6	57.8	0.1	No
2663575	Pasadena Fwy	78.1	78.1	0.0	No
2665469	Mission St	68.0	68.2	0.1	No
2665470	Mission St	63.9	64.1	0.1	No
2665471	Mission St	65.4	65.5	0.1	No
2673636	Huntington Dr	71.8	72.0	0.2	No
2673637	Huntington Dr	71.7	71.9	0.2	No
2673638	Ramona Ave	44.3	44.5	0.2	No
2673639	Ramona Ave	45.7	44.2	-1.5	No
2673642	Pine St	45.7	44.2	-1.5	No
2673645	Meridian Ave	64.5	64.5	0.0	No
2673647	Meridian Ave	64.3	64.4	0.0	No

TABLE 3.11-10
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTRIBUTIONS

ID	Road	Noise Level (dBA CNEL at 50 Feet)			Exceeds Thresholds?
		No Project	With Project	Project Change	>3 dBA Increase & Exceeds 65 dBA CNEL
2673649	Meridian Ave	64.6	64.7	0.0	No
2673650	Meridian Ave	64.3	64.5	0.2	No
2673651	Meridian Ave	65.2	65.3	0.1	No
2673653	Monterey Rd	65.6	65.8	0.2	No
2673654	Brunswick Ave	63.1	63.2	0.1	No
2673655	Hill Dr	63.5	63.5	0.1	No
2673656	Hill Dr	62.5	62.6	0.1	No
2673657	Camino Del Sol	59.2	59.4	0.2	No
2673658	Camino Del Sol	59.7	59.9	0.2	No
2673659	Via Del Rey	59.2	59.5	0.2	No
2673660	Via Del Rey	63.0	63.3	0.3	No
2673661	Via Del Rey	63.0	63.3	0.3	No
2673662	Monterey Rd	70.0	70.0	0.0	No
2673663	Via Del Rey	63.2	63.5	0.3	No
2673665	El Centro St	60.2	61.7	1.5	No
2673666	Fremont Ave	66.6	66.7	0.1	No
2673667	El Centro St	51.9	53.3	1.3	No
2673668	Fair Oaks Ave	71.8	72.0	0.1	No
2673669	El Centro St	11.7	24.2	12.5	No
2673670	El Centro St	15.6	16.2	0.5	No
2673671	Mission St	62.0	62.0	0.0	No
2673672	Brent Ave	15.6	16.1	0.5	No
2673673	Mission St	61.8	61.9	0.1	No
2673674	Park Ave	57.8	59.2	1.4	No
2673675	Hope St	57.5	58.9	1.4	No
2673676	Park Ave	57.9	59.3	1.4	No
2673677	Grevelia St	61.3	61.3	-0.1	No
2673678	Clark Pl	62.7	62.7	-0.1	No
2673679	Garfield Ave	61.4	61.4	-0.1	No
2673680	Raymondale Dr	48.2	48.2	0.0	No
2673683	Raymondale Dr	48.8	48.8	0.0	No
2673684	W State St	57.9	58.1	0.1	No
2673685	Fair Oaks Ave	73.0	73.1	0.1	No
2673686	Columbia St	62.2	61.9	-0.3	No
2673687	Fremont Ave	62.0	62.0	0.0	No
2673688	Columbia St	61.7	61.4	-0.3	No
2673689	Columbia St	63.9	64.1	0.2	No
2673690	Columbia St	63.9	64.1	0.2	No
2673716	Fair Oaks Ave	72.0	72.1	0.1	No
2673718	Oak St	45.2	50.2	5.0	No
2673719	Fair Oaks Ave	72.4	72.5	0.1	No
2673720	Oak St	44.2	50.6	6.4	No

TABLE 3.11-10
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTRIBUTIONS

ID	Road	Noise Level (dBA CNEL at 50 Feet)			Exceeds Thresholds?
		No Project	With Project	Project Change	>3 dBA Increase & Exceeds 65 dBA CNEL
2673721	Oak St	45.1	45.5	0.4	No
2673722	Oak St	45.0	48.0	3.0	No
2673723	E Huntington Dr	70.5	70.6	0.1	No
2673724	Fletcher Ave	45.1	48.1	3.0	No
2675727	Meridian Ave	64.7	64.7	0.0	No
2675835	E Huntington Dr	70.4	70.5	0.1	No
2675836	No Name	46.4	49.7	3.3	No
2691501	Collis Ave	65.1	65.2	0.1	No
2691507	Hill Dr	64.4	64.4	0.0	No
2691533	Monterey Rd	67.7	67.8	0.1	No
2691588	Pasadena Ave	70.7	70.7	0.0	No
2691593	Arroyo Dr	64.4	64.7	0.3	No
2691595	Arroyo Dr	64.0	64.1	0.1	No
2691597	Mission St	67.9	68.1	0.2	No
2691599	San Pasqual Ave	59.6	59.7	0.1	No
2691703	Fremont Ave	67.4	67.4	0.0	No
2691707	Fremont Ave	66.5	66.6	0.0	No
2691709	Fremont Ave	66.3	66.4	0.0	No
2691711	Fair Oaks Ave	72.4	72.4	0.1	No
2691713	E Huntington Dr	70.5	70.6	0.0	No
2691757	Garfield Ave	62.7	62.7	0.0	No
2691773	Monterey Rd	70.2	70.3	0.1	No
2691781	Fremont Ave	64.8	64.8	0.0	No
2691783	Fremont Ave	64.9	64.9	0.0	No
2691785	Fair Oaks Ave	70.2	70.2	0.0	No
2691787	Monterey Rd	64.2	64.2	0.0	No
2691789	Mission St	63.4	63.5	0.1	No
2691805	Monterey Rd	64.0	64.0	0.0	No
2753918	Mission St	67.7	67.9	0.2	No
2757439	Fair Oaks Ave	68.3	68.4	0.0	No
2757440	Grevelia St	60.9	60.9	0.0	No
2757452	Pasadena Ave	64.5	64.8	0.4	No
2757453	El Centro St	60.9	62.5	1.6	No
2757454	S Grand Ave	59.0	59.7	0.7	No
2757478	Hill Dr	61.9	62.0	0.0	No
2757479	Hill Dr	62.2	62.2	0.0	No
2757492	Alpha St	63.7	63.9	0.3	No
2757493	Camino Lindo	63.7	64.0	0.3	No
2757494	Flores De Oro	64.2	64.5	0.3	No
2757495	E Huntington Dr	70.1	70.1	0.1	No
2757496	Marengo Ave	64.9	65.0	0.1	No
2757497	Marengo Ave	64.5	65.2	0.7	No
2757498	Marengo Ave	64.3	64.3	0.1	No

TABLE 3.11-10
FUTURE (2040) WITH PROJECT TRAFFIC NOISE CONTRIBUTIONS

ID	Road	Noise Level (dBA CNEL at 50 Feet)			Exceeds Thresholds?
		No Project	With Project	Project Change	>3 dBA Increase & Exceeds 65 dBA CNEL
2757499	Marengo Ave	64.4	64.9	0.5	No
2757500	Marengo Ave	64.3	64.5	0.2	No
2757502	Meridian Ave	64.9	65.0	0.1	No
2762124	Ramp-Other	61.1	61.0	-0.1	No
Fwy: Freeway; Ave: Avenue; St: Street; Rd: Road; Blvd: Boulevard; Dr: Drive; E: East; W: West Source: Psomas 2023, modeling inputs and results for this scenario are presented in Appendix E-2					

As shown in Table 3.11-10, the future with Project traffic noise levels at adjacent land uses would not result in a noticeable change in noise levels (3 dBA) when noise levels exceed 65 dBA CNEL and therefore would not exceed the threshold. It should also be noted that some traffic volumes and noise levels are forecast to slightly decrease (refer to Table 3.14-2 in Section 3.14, Transportation, of this PEIR. Based on the significance criteria for off-site noise impacts (see Table 3.11-4), the Project-related increases in noise levels at the nearest sensitive receptor due to traffic noise alone represent a less than significant impact under the future (2040) with Project scenario, and no mitigation is required.

Traffic Noise Levels Near Future Development

Table 3.11-11, Future (2040) with Project Traffic Noise Levels by Focus Area, summarizes the worst-case exterior traffic noise level ranges for future development of land uses within each focus area.

TABLE 3.11-11
FUTURE (2040) WITH PROJECT TRAFFIC NOISE LEVELS BY FOCUS AREA

Focus Area	Future CNEL (Worst-Case Transportation Noise Levels)
Corridors (Downtown Specific Plan)	
Mission Street and Fair Oaks Avenue	61 to 73
Districts	
Ostrich Farm	70 to 80
Neighborhood Centers	
Huntington Drive & Garfield Avenue	60-70
Huntington Drive & Fremont Avenue	60-70
Huntington Drive & Fletcher Avenue	50-70
Source: Psomas 2023, modeling inputs and results for this scenario are presented in Appendix E-2	

The proposed residential uses within the focus areas would experience future exterior noise levels greater than the *normally acceptable* exterior noise level compatibility criteria identified in the existing General Plan Safety and Noise Element. Based on this and the proximity of future noise-

sensitive land uses to SR-110 and the Metro A Line, the on-site transportation-related noise impacts at future uses within the five focus areas defined would be expected to exceed 65 dBA CNEL, which would be a significant impact. Therefore, MM NOI-1 requires that prior to issuance of a building permit the Project Applicant/Developer of future projects with residential units submit an acoustical report to the City, which identifies reasonable and feasible measures to achieve a 65 dBA CNEL exterior noise level. Measures to achieve the required exterior noise level could include features such as sound walls, selective patio/balcony orientation, site configuration, and architectural fenestration to deflect sound. The proposed Project includes actions to use the Land Use Noise Compatibility Matrix to evaluate land use decisions and to require development projects to implement mitigation measures, where necessary, to reduce exterior and interior noise levels to meet standards. While it may be possible to satisfy the exterior noise standards for some projects, the transportation noise levels may still exceed the exterior 65 dBA CNEL standard for some projects. Therefore, the exterior on-site transportation noise impact is considered significant and unavoidable.

The interior noise levels of future developments in the focus areas and elsewhere in the City must comply with the CBC interior noise level standards. The interior noise level is the difference between the predicted exterior noise level at the building facade and the noise reduction (NR) of the structure. Typical building construction provides a noise reduction of approximately 12 dBA with windows open and a minimum 25 dBA noise reduction with windows closed. However, sound leaks, cracks, and openings within the window assembly can greatly diminish its effectiveness in reducing noise. Several methods are used to improve interior noise reduction, including: (1) weather-stripped solid core exterior doors; (2) upgraded dual glazed windows; (3) mechanical ventilation/air conditioning; and (4) exterior wall/roof assembles free of cut outs or openings.

To provide the necessary interior noise level reduction, all future buildings developed with residential units would be required to provide a windows-closed condition and a means of mechanical ventilation (e.g., air conditioning) such that the residents of those buildings can achieve a 45 dBA CNEL environment. As previously discussed, the estimated traffic noise contours indicate some focus areas would experience exterior noise levels, which exceed 70 dBA CNEL at the building facade. With typical building construction and a windows-closed condition, a minimum 25 dBA CNEL reduction is achievable for residential dwelling units. However, the minimum 25 dBA CNEL with standard building construction may result in interior noise levels greater than 45 dBA CNEL, which would be considered a significant impact. Therefore, MM NOI-2 requires that the Project Applicant/Developer of future residential and mixed-use projects submit an interior noise analysis, which demonstrates that the interior noise level meets 45 dBA CNEL, to the City prior to issuance of a building permit. With implementation of MM NOI-2, traffic noise impacts on future development would be less than significant.

Stationary Source Noise

The proposed residential land uses would be noise-sensitive receiving land uses and are not expected to include any specific type of stationary noise sources beyond the typical noise sources (e.g., heating, ventilating and air conditioning [HVAC] units) associated with existing residential land use in the City. Project-related stationary source (operational) noise could be generated by the operation of potential commercial/retail and office uses pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element. Such noise sources could include HVAC units, loading dock activities, outdoor restaurant dining and music activities, and parking lot vehicle movements. It is noted that these potential noise sources are consistent with type of existing stationary noise sources observed in the City. The proposed Project includes actions to require mixed-use structures to minimize the transmission of noise generated by commercial uses

affecting residential uses, minimize stationary noise impacts on sensitive receptors, and require control of noise from construction activities, private developments/residences, landscaping activities, and special events. However, because the stationary source noise levels due to operation of future commercial/retail and office uses would vary depending on the tenant, the impacts due to operation of non-residential uses are considered potentially significant. Therefore, MM NOI-3 requires that the Applicant/Developer of future projects with non-residential uses that are near noise-sensitive land uses submit an acoustical report, which demonstrates that exterior noise levels at adjacent noise-sensitive land use property lines satisfy Section 19A.7(b), 19A.12, and 19.21(c) of the SPMC. The acoustical report shall provide specific site mitigation, if needed, to ensure that all exterior noise standards are implemented to the satisfaction of the City prior to issuance of a building permit. With implementation of MM NOI-3, on-site operational noise impacts from stationary sources would be less than significant.

To summarize the Project noise analysis:

- Project-generated traffic noise level increases at off-site sensitive receptors would be less than significant and no mitigation is required;
- Exterior transportation noise levels at proposed future development would be a significant and unavoidable impact even with implementation of MM NOI-1;
- Interior noise impacts at proposed future development would be less than significant with implementation of MM NOI-2; and
- Stationary source noise impacts would be less than significant with implementation of MM NOI-3.

Threshold 3.11b: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used and distance to the affected structures and soil type. It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. Ground-borne vibration levels resulting from construction activities were estimated by data published by the FTA. Construction activities that would have the potential to generate low levels of ground-borne vibration include mobile equipment activities and pile driving, among others. Ground vibration levels associated with various types of construction equipment are summarized in Table 3.11-12, Vibration Source Levels for Construction Equipment, which is based on the reference vibration levels provided by the FTA.

TABLE 3.11-12
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Pile Driver	0.640
Source: Urban Crossroads 2018. (Appendix E-1)	

Using the vibration source level of construction equipment provided in Table 3.11-12 and the construction vibration assessment methodology published by the FTA, it is possible to estimate the Project vibration impacts. Table 3.11-13, Construction Equipment Vibration Levels, on the following page summarizes the expected construction-related vibration levels at distances ranging from 25 to 400 feet.

TABLE 3.11-13
CONSTRUCTION EQUIPMENT VIBRATION LEVELS

Distance to Construction Activity (Feet)	Receiver PPV Levels (in/sec)[1]					RMS Vibration Level (in/sec)[2]		Threshold Exceeded?[3]	
	Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Pile Driving	Large Bulldozer	Pile Driving	Typical Const.	Pile Driving
25	0.003	0.035	0.076	0.089	0.640	0.063	0.454	Yes	Yes
50	0.001	0.012	0.027	0.031	0.226	0.022	0.161	Yes	Yes
100	0.000	0.004	0.010	0.011	0.080	0.008	0.057	No	Yes
200	0.000	0.002	0.003	0.004	0.028	0.003	0.020	No	Yes
400	0.000	0.001	0.001	0.001	0.010	0.001	0.007	No	No

[1] Based on the vibration source levels of construction equipment included on Table 3.11-12.
[2] Vibration levels in PPV are converted to RMS velocity using a 0.71 conversion factor identified in the Caltrans Transportation and Construction Vibration Guidance Manual, September 2013.
[3] Does the peak vibration exceed the vibration threshold of 0.01 in/sec RMS?

Source: Urban Crossroads 2018. (Appendix E-1)

As discussed in Section 3.11.3, Relevant Programs and Regulations, the County's vibration perception threshold of 0.01 in/sec RMS is used in this analysis to assess the human perception of vibration levels due to Project-related construction activities. This analysis focuses on whether construction activities would result in a perceptible level of vibration. Based on the reference vibration levels provided by the FTA, a large bulldozer represents the highest source of typical construction-related (non-pile driving) vibration with a reference velocity of 0.089 in/sec PPV at 25 feet. At distances ranging from 25 to 400 feet from the site of construction activity, typical construction (i.e., non-pile driving) vibration velocity levels are expected to range from less than 0.001 to 0.089 in/sec PPV, as shown in Table 3.11-13. The large bulldozer values equate to perceived vibration levels ranging from 0.001 to 0.063 in/sec RMS. Impact pile driving would generate higher vibration levels ranging from 0.010 to 0.640 in/sec PPV, or 0.007 to 0.454 in/sec RMS.

Compared with the County of Los Angeles construction vibration perception threshold 0.01 in/sec RMS, the typical construction activities (i.e., non-pile-driving) associated with future development projects would exceed the vibration standard at receiver locations within 25 feet for jackhammers, 50 feet of loaded trucks, and 100 feet of large bulldozers, if used. Therefore, MM NOI-4 requires that the use of loaded trucks, large bulldozers, and jackhammers at construction sites nearby sensitive land uses (e.g., residential, school) shall be minimized to the maximum extent feasible unless the vibration levels are shown to be less than the County threshold of 0.01 in/sec RMS. Similarly, pile driving vibration levels would exceed the County construction vibration standard of 0.01 in/sec RMS at receiver locations within 400 feet of the pile locations if impact pile drivers are used during Project construction. MM NOI-4 also requires pile driving activity within 400 feet of nearby sensitive land uses (e.g., residential, school) be minimized, or alternative methods be used, unless the vibration levels are shown to be less than the County threshold of 0.01 in/sec RMS.

MM NOI-4 prescribes various means to reduce both construction vibration levels and noise levels (discussed further below under Threshold 3.11d). Additionally, vibration levels exceeding standards have the potential to damage fragile historic structures. Therefore, MM NOI-5 requires a pre-construction assessment of possible structural damage for construction activity within 25 feet of a historic building, as identified on the City of South Pasadena Historic Resources Survey at that time. The construction vibration levels at the site of the closest sensitive receivers are unlikely to be sustained during the entire construction period but would occur only during the times that heavy construction equipment is operating adjacent to the construction site perimeter. Further, construction would be restricted to SPMC daytime construction hours, unless otherwise permitted by the City, thereby reducing potential vibration impacts during the sensitive nighttime hours. With implementation of MMs NOI-4 and NOI-5, the construction-related vibration impacts at nearby sensitive receiver locations would be reduced to a less than significant level impact during the worst-case construction activities at the site boundary.

Rail Line Operation

Based on the methodology provided by the FTA's General Vibration Assessment, Metro A Line rail activity is anticipated to generate vibration levels of up to 73 VdB at 50 feet from trains traveling at 50 mph. At the average speed of 35 mph, the reference vibration level is reduced by 3 VdB, and results in estimated vibration impacts of 70 VdB at 50 feet from the railroad tracks. It is important to note that this rail vibration assessment likely overstates the vibration levels at the future Project uses since the FTA Transit Noise and Vibration Impact Assessment states that "*although actual levels fluctuate widely, it is rare that ground-borne vibration will exceed the curves by more than one or two decibels unless there are extenuating circumstances, such as wheel or running-surface defects*" (Urban Crossroads 2018).

However, some residential and non-residential uses within the focus areas are anticipated to be located within 50 feet of the Metro A Line railroad tracks and may experience vibration levels greater than 70 VdB, which can exceed the residential 72 VdB and non-residential 75 VdB criteria for frequent rail events. This would be considered a significant impact. Therefore, MM NOI-6 requires that the Applicant/Developer of future projects within 50 feet of the A Line submit a Vibration Study, which identifies all reasonable and feasible measures to avoid exceeding a 72 VdB residential and 75 VdB non-residential vibration level, to the City prior to issuance of a building permit. With implementation of MM NOI-6, operational vibration impacts would be less than significant.

It is noted that while future development could be exposed to vibration from off-site sources (i.e., train activity on the railroad tracks), the proposed land uses (i.e., residential and commercial/office) are not expected to include any specific type of operational vibration sources.

Threshold 3.11c: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

The nearest airport is the San Gabriel Valley Airport, located at 4233 Santa Anita Avenue, El Monte, approximately six miles east-southeast of the City at the nearest points. There are no private airstrips in or near the City; thus, no noise from airstrips would occur. There would be no impact, and no mitigation is required.

3.11.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Future development in the City and the surrounding area would add new mobile and stationary noise sources, resulting in increased noise levels. The analysis of buildout of the proposed General Plan and DTSP Update & 2021–2029 Housing Element includes cumulative traffic volumes in the region by 2040. Thus, noise impacts associated with the Project account for cumulative noise impacts.

The Noise Analysis determined that the Project's contribution to future traffic noise levels at adjacent land uses would not result in a noticeable change in noise levels (3 dBA) when noise levels exceed 65 dBA CNEL, on the 170 roadway segments analyzed (Table 3.11-9). Therefore, the off-site traffic noise increase would be less than significant cumulative impact under the future (2040) with Project scenario, which accounts for regional traffic growth. However, the year 2040 traffic would result in on-site exterior noise levels that would exceed the standard of 65 dBA CNEL at future development in the focus areas (Table 3.11-10). This would be a significant and unavoidable impact with implementation of MM NOI-1. This would also be considered a significant and unavoidable cumulative impact.

Interior noise levels at future development in the focus areas with year 2040 traffic would be less than significant with implementation of MM NOI-2, and on-site operational noise impacts from stationary sources would be less than significant with implementation of MM NOI-3. Therefore, there would be less than significant cumulative impacts related to interior noise levels and operational noise from stationary sources.

Noise and vibration impacts related to the Metro A Line and construction activity would be limited geographically to the alignment of the A Line within the City of South Pasadena and individual construction sites, respectively. Therefore, these noise and vibration sources would not contribute to a cumulatively significant impact due to the effects of noise attenuation.

3.11.8 MITIGATION MEASURES

NOI-1 Prior to the issuance of a building permit for new residential or mixed-use development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the project will satisfy the 65 dBA CNEL exterior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.

NOI-2 Prior to the issuance of a building permit for new residential or mixed-use development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates that the interior noise levels in all habitable rooms will satisfy the California Building Code 45 dBA CNEL interior noise level standard, including identification of reasonable and feasible noise mitigation measures if determined necessary. It is the responsibility of the City of South Pasadena Community Development Department, or designee, to ensure that any necessary mitigation measures are fully and properly implemented.

NOI-3 Prior to the issuance of a building permit and/or certificate of occupancy for non-residential development projects, the Project Applicant/Developer shall submit an acoustical report or other substantial evidence to the City of South Pasadena Community Development Department, or designee, that demonstrates:

- Exterior noise levels at adjacent property lines will satisfy the South Pasadena Municipal Code Section s19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval. The site-specific acoustical report shall identify the necessary measures, if any, required to reduce exterior noise levels to below the South Pasadena Municipal Code Section 19A.7(b), 19A.12, and 19.21(c) exterior noise level limits, and satisfy any conditions of approval.
- Acoustical isolation between units has been included in the project design for residential dwelling units situated above non-residential uses.

NOI-4 Prior to the issuance of a building permit for new development, the Project Applicant/ Developer shall submit a final acoustical report to the City of South Pasadena Community Development Department, or designee, that demonstrates:

- Exterior construction noise levels at the closest sensitive receiver locations will satisfy the FTA 80 dBA L_{eq} residential and 85 dBA L_{eq} commercial 8-hour construction noise level standards and the County of Los Angeles 0.01 in/sec root-mean-square velocity (RMS) vibration standard. The site-specific report shall identify the necessary reduction measures, if any, required to reduce exterior noise and vibration levels to below FTA noise and County of Los Angeles vibration thresholds.

- Measures to reduce construction noise and vibration levels, such as but not limited to those provided below, shall be incorporated in the final acoustical report:
    - Install temporary construction noise barriers at the project site boundary that break the line of sight for occupied sensitive uses for the duration of construction activities. The noise control barrier(s) must provide a solid face from top to bottom and shall:
        - Provide a minimum transmission loss of 20 dBA and be constructed with an acoustical blanket (e.g., vinyl acoustic curtains or quilted blankets) attached to the construction site perimeter fence or equivalent temporary fence posts;
        - Be properly maintained with any damage promptly repaired. Gaps, holes, or weaknesses in the barrier or openings between the barrier and the ground shall be promptly repaired.
- Install sound dampening mats or blankets to the engine compartments of heavy mobile equipment (e.g., graders, dozers, heavy trucks). The dampening materials must be capable of a 5 dBA minimum noise reduction, must be installed prior to the use of heavy mobile construction equipment, and must remain installed for the duration of the equipment use.
- Construction activities requiring pile driving within 400 feet, large bulldozers within 100 feet, loaded trucks within 50 feet, or jackhammers within 25 feet of nearby sensitive land uses (e.g., residential, school) shall be minimized, or alternative equipment or methods shall be used, unless the vibration levels are shown to be less than the County of Los Angeles RMS threshold of 0.01 in/sec.

NOI-5 The Project Applicant/Developer of any site-specific development within 25 feet of an historic resource shall engage a qualified structural engineer to conduct a pre-construction assessment of the structural integrity of the nearby historic structure(s) and, prior to the issuance of a building permit, submit evidence to the City of South Pasadena Community Development Department, or designee, that the operation of vibration-generating equipment associated with the new development would not result in structural damage to the adjacent historic building(s). If recommended by the pre-construction assessment, ground borne vibration monitoring of nearby historic structures shall be required.

NOI-6 Prior to the issuance of a building permit for new development projects within 50 feet of the Metro A Line, the Project Applicant/Developer shall submit a final vibration study to the City of South Pasadena Community Development Department, or designee, which shall identify and require implementation of reasonable and feasible vibration reduction measures to avoid exceeding the 72 VdB residential and 75 VdB non-residential vibration level standards.

NOI-7 The Project Applicant/Developer for new development shall be responsible for ensuring that following requirements are implemented by the contractor throughout the construction period. Construction contractors shall be required to implement the following measures to reduce noise levels from construction activity:

- equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers' standards, and all stationary construction equipment shall be placed so that emitted noise is directed away from the noise-sensitive use nearest the construction activity;
- locate equipment staging in areas that will create the greatest distance between construction-related noise sources and noise-sensitive receiver nearest to the construction activity; and
- limit haul truck deliveries to the same hours specified for construction equipment by Section 19A.13(a) of the South Pasadena Municipal Code. The contractor shall design delivery routes to minimize the exposure of sensitive land uses to delivery truck noise.

3.11.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction Noise Levels

Significant and unavoidable impact with mitigation at both a program and cumulative level.

Construction and Operational Vibration Levels

Less than significant impact related to construction-related vibration with mitigation at a program level. No impact at a cumulative level as construction vibration effects would be geographically limited to the construction site. No impact related to operational vibration at a program and cumulative level.

On-Site Stationary Source Noise

Less than significant impact with mitigation at both a program and cumulative level.

Exterior Traffic Noise

Significant and unavoidable impact with mitigation at both a program and cumulative level.

Interior Traffic and Stationary Source Noise

Less than significant impact with mitigation at both a program and cumulative level.

Airport and Airstrip Noise

No impact at both a program and cumulative level.

3.11.10 REFERENCES

Urban Crossroads, Inc. (Urban Crossroads). 2018 (May). *South Pasadena General Plan and Downtown Specific Plan Update Noise Impact Analysis.* Costa Mesa, CA: Urban Crossroads. Appendix E-1.

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3.12 POPULATION AND HOUSING

3.12.1 METHODOLOGY

This section addresses the existing population, housing, and employment conditions in the City of South Pasadena (City) and analyzes anticipated changes to population, housing, and employment related to implementation of the General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project). Existing and future population and housing characteristics are based on the California Department of Finance (DOF) estimates, U.S. census data, and growth projections from the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS; also referred to as Connect SoCal). Existing employment statistics were taken from the U.S. Department of Labor, Bureau of Labor Statistics (BLS), California Employment Development Department (EDD), and SCAG growth projections. The assessment of population, housing, and employment impacts assumes full buildout of the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

3.12.2 EXISTING CONDITIONS

Population

Table 3.12-1, Historic Population Trends, 1990–2022, shows the population and percent change in the City and the County in 1990, 2000, and 2010, based on U.S. Census data, and for 2022 based on California DOF estimates. The City has experienced an approximately 6.9 percent increase in population between 1990 and 2022, compared to an approximately 11.3 percent increase in population in Los Angeles County as a whole. As shown below, the City has experienced minimal but steady population growth since 1990, with the greatest growth between 2000 and 2010 at approximately 0.55 percent annually. The City's trends do not always mimic the County's population trends.

TABLE 3.12-1
HISTORIC POPULATION TRENDS, 1990–2022

	South Pasadena		Los Angeles County	
Year	Population	Average Change Per Year [and Per Decade]	Population	Average Change Per Year [and Per Decade]
1990	23,936	—	8,863,052	—
2000	24,292	+0.15% [1.49%]	9,519,338	+0.69% [7.40%]
2010	25,619	+0.55% [5.46%]	9,818,605	+0.31% [3.14%]
2022	25,580	-0.01% [N/A]	9,861,224	+4.3% [N/A]
Sources: U.S. Census 1992, 2002, 2012; and DOF 2022				

Housing

Table 3.12-2, Historic Housing Trends, 1990–2022, shows the housing units (including vacant units) and percent change in the City and the County in 1990, 2000, and 2010, based on the decennial U.S. Census data, and for 2022 based on the DOF estimates. The City has experienced an approximately 4.1 percent increase in housing units between 1990 and 2022, compared to an

approximately 15.0 percent increase in housing units in Los Angeles County as a whole. As shown below, the City has experienced relatively minor housing growth since 1990, with a total of 437 net new units, with the greatest growth between 2000 and 2010 at approximately 0.25 percent annually. The City's trends often, but not always, mimic the County's housing trends.

TABLE 3.12-2
HISTORIC HOUSING TRENDS, 1990–2022

	South Pasadena		Los Angeles County	
Year	Housing Units	Average Change Per Year [and Per Decade]	Housing Units	Average Change Per Year [and Per Decade]
1990	10,719	—	3,163,310	—
2000	10,850	+0.12% [1.22%]	3,270,909	+0.34% [3.40%]
2010	11,118	+0.25% [2.47%]	3,445,076	+0.53% [5.32%]
2022	11,156	+0.03% [N/A]	3,635,915	+0.46% [N/A]
Sources: U.S. Census 1992, 2002, 2012; and DOF 2022.				

Employment

Table 3.12-3, Historic Employment Trends, 2000–2022, shows the number of jobs and percent change in the City and the County in 2000, 2010, and 2022 based on BLS and EDD data estimates. As shown below, the City has experienced modest employment growth since 2010, approximately 1.3 percent. There was a substantial reduction in jobs in the City between 2000 and 2010 of over 13 percent, reflecting the effects of the Great Recession. The relatively low increase in jobs between 2010 and 2022, represented by estimated employment in 2022, reflects the ongoing recovery from the Great Recession combined with the effects of the COVID-19 pandemic. What these perturbations show is the strong link between unanticipated–yet periodic–economic upheavals and associated employment levels. The City's trends generally mimic the County's employment trends.

TABLE 3.12-3
HISTORIC EMPLOYMENT TRENDS, 2000–2022

	South Pasadena		Los Angeles County	
Year	Jobs	Percent Change	Jobs	Percent Change
2000	14,857[a]	—	4,413,200[c]	—
2010	13,128[a]	-13.2%	4,318,700[c]	-2.2%
2022	13,700[b]	+4.4%	4,703,800[b]	+8.9%
Sources: [a] BLS 2018 [b] EDD 2022 [c] EDD 2021				

Growth Projections

Growth projections for the City of South Pasadena have been developed by SCAG as part of its regional planning efforts for the development of the 2020 RTP/SCS and the Regional Housing Needs Assessment (RHNA). The projections for the 2020–2045 RTP/SCS (SCAG 2021a) are

presented in the *Demographics and Growth Forecast Technical Report* (SCAG 2021b). In this technical report, the jurisdiction-level forecast is provided for the years 2016 and 2045 only. Therefore, Psomas submitted a public records request to SCAG for the forecast data by jurisdiction for more intervals between 2016 and 2045. The SCAG-provided forecast included the years 2016, 2020, 2040, 2035, and 2045, but not 2040; however, SCAG indicated the year 2040 projections could be calculated by using a linear interpolation between 2035 and 2045 data sets (Aguilar 2021).

According to SCAG, the City is projected to have a 2040 population of 27,004 persons, with 11,109 households, and an employment base of 11,984 persons. It is noted these projections are based in part on coordination between the City and SCAG during preparation of the RTP/SCS and reflects the anticipated growth in the City prior to release of the unexpectedly high 6th Cycle RHNA. Specifically, it more closely matches the 2040 conditions with 589 dwelling units (DUs) and 430,000 sf of non-residential, which was envisioned prior to including the 2021–2029 Housing Element Implementation Programs in this Program Environmental Impact Report (PEIR). Table 3.12-4, SCAG Growth Projections for South Pasadena, summarizes SCAG's growth forecast for the City.

TABLE 3.12-4
SCAG GROWTH PROJECTIONS FOR SOUTH PASADENA

	South Pasadena			Los Angeles County		
	2016	**2020**	**2040**	**2016**	**2020**	**2040**
Population	25,992	26,088	27,100	10,110,339	10,407,326	11,423,962
Households	10,431	10,517	11,109	3,318,988	3,471,759	4,002,104
Employment	11,411	11,528	11,984	4,743,403	4,838,458	5,276,927
Source: SCAG 2020, Aguilar 2021.						

It is noted that the SCAG employment figure (11,528 jobs in 2020) is well below the EDD employment figure (13,700 jobs in 2022) (see Table 3.12-3 above). This PEIR utilizes the EDD 2022 estimate of employment as the more relevant figure for this issue (i.e., employment) for purposes of determining impacts, because it is derived from more frequently updated, real-time datasets.

Jobs – Housing Balance

SCAG states that "a balance between jobs and housing in a metropolitan region can be defined as a provision of an adequate supply of housing to house workers employed in a defined area (i.e., community or subregion). Alternatively, a jobs/housing balance can be defined as an adequate provision of employment in a defined area that generates enough local workers to fill the housing supply" (SCAG 2001). Jobs and housing are considered in balance when a subregion has enough employment opportunities for most people who live there and enough housing opportunities for most people who work there. SCAG uses the jobs/housing ratio to assess the relationship between housing and employment growth. An area with a ratio between 1.0 and 1.29 is considered to be "balanced" (SCAG 2001). The jobs/housing balance is one indicator of quality of life in a project area.

Jobs-rich areas in Southern California are located in the highly urbanized areas in the western portion of the region primarily in southern and western Los Angeles County, and in central and northern Orange County. Housing-rich areas are located in suburban communities located east

of these employment centers, including San Bernardino and Riverside Counties and North Los Angeles County. Table 3.12-5, Los Angeles County and South Pasadena Jobs-Housing Ratios (2016–2040), identifies the projected jobs-housing ratio for both the County and the City between 2016 and 2040 based on SCAG data, for purposes of disclosure.

TABLE 3.12-5
COUNTY OF LOS ANGELES AND CITY OF SOUTH PASADENA
PROJECTED JOBS-HOUSING RATIOS (2016–2040)

	2016	2020	2040
South Pasadena			
Households (DUs)[a]	10,431	10,517	11,109
Housing Units	11,038	11,129	11,756
Employment[a]	11,411	11,528	11,984
Jobs/Housing Ratio	1.03	1.04	1.02
Los Angeles County			
Households (DUs)[a]	3,318,988	3,471,759	4,002,104
Housing Units	3,545,927	3,709,144	4,275,752
Employment[a]	4,246,600	4,662,500	5,225,800
Jobs/Housing Ratio	1.34	1.30	1.23

DUs: dwelling unit(s)

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena and 6.4 percent for Los Angeles County (DOF 2022).

Sources: SCAG 2020, Aguilar 2021.

As shown in Table 3.12-5, based on SCAG data, the City's jobs-housing ratio was 1.04 in 2020 with a slight decrease to 1.02 in 2040. The County is also projected to experience a declining jobs-housing ratio, though at approximately three times the rate of the City. A declining jobs-housing ratio results from households increasing relative to employment.

However, as discussed previously, SCAG's existing employment figures are well below jobs figures calculated by the EDD and do not accurately reflect the reality of employment provided in the City. Based on California EDD data, the estimated 2022 employment was reported as 13,700 jobs (EDD 2022). Based on an estimated 11,156 housing units in 2022 reported by DOF, the jobs-housing balance in the City of South Pasadena is, more accurately, approximately 1.23. The estimated jobs-housing ratio in the future with Project implementation is discussed in the impact analysis below.

3.12.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Uniform Relocation Assistance and Real Property Acquisition Act

The Uniform Relocation Assistance and Real Property Acquisition Act (42 *United States Code* Section 4601 et. seq.) was passed by Congress in 1970 and establishes standards for federally-funded programs and projects that require the acquisition of real property (real estate) for the displaced persons from their homes, businesses, or farms. It applies to projects using U.S. Department of Housing and Urban Development (HUD) funds and HUD programs only. It calls

for (1) just compensation of any real property acquisition, including reimbursement for expenses resulting from the transfer of title (such as recording fees, prepaid real estate taxes, or other expenses); (2) relocation services to displaced residential tenants and owner occupants with adequate notice; (3) reimbursement for moving expenses and payments for the added cost of renting or purchasing comparable replacement housing; (4) relocation services for displaced businesses, farms, and nonprofit organizations with adequate notice; and (5) reimbursement for moving and re-establishment expenses.

State

It is noted that the California legislature continues to consider, and is expected to pass, additional regulations that could affect housing requirements and/or development mandates. Pending legislation is not analyzed in this PEIR. The State regulations below are those already passed that are most relevant to the environmental analysis of the Project.

California Relocation Assistance Act

In 1970, the State adopted the California Relocation Assistance Act (*California Government Code* §7260 et seq.), which follows the federal Uniform Relocation Assistance and Real Property Acquisition Act. Like the federal program, this regulation does not apply to private projects; the State law applies for displacement due to a program or project undertaken by a public entity (Section 7260 of the Government Code). This State law requires public agencies to provide procedural protections and benefits when they displace businesses, homeowners, and tenants in the process of implementing public programs and projects. The act calls for fair, uniform, and equitable treatment of all affected persons through the provision of relocation benefits and assistance to minimize the hardship of displacement on the affected persons.

AB 1482

In 2019, Assembly Bill (AB) 1482 was signed into law by Governor Newson and caps rent increases statewide for the next 10 years. Specifically, effective on January 1, 2020, annual rent increases are limited to 5 percent plus any rise in the consumer price index, which cannot exceed 10 percent. AB 1482 does not apply to all residential dwellings, such as buildings constructed within the past 15 years. AB 1482 includes apartments and multi-family buildings containing two or more units but exempts single-family residences, owner-occupied duplexes, and condominiums except when owned by corporations or an LLC in which at least one member is a corporation. In addition to limiting rent increases, AB 1482 prevents evictions without just cause for tenants that have lived in the unit for at least one year. Just cause for eviction includes failure to pay rent, criminal activity, or breach of a material term of the lease. It also includes repossessing the property for the owner or owner's immediate family member to move in, demolish or substantially remodel the property, and withdraw the property from the rental market.

Land Use Planning Law

The requirements and authority for local municipalities (i.e., counties and cities) in California to prepare and administer general plans are contained in Sections 65300 et. seq. of the *California Government Code.* A general plan is a regulatory document established by a city or county to provide a guide for the future physical, economic, social, and environmental well-being of the city or county. It generally consists of goals, policies, actions and/or programs that would achieve the community's vision for its future. For cities, the general plan guides the development of the incorporated city, plus any land outside city boundaries that has a relationship to the city's planning activities. This area outside a city's boundaries is called the Sphere of Influence. The

City of South Pasadena does not have a sphere of influence; its jurisdictional boundaries align with the City limits.

The housing element is one of the State-mandated elements of a general plan. It identifies the City's housing conditions, needs, and opportunities; and establishes the programs that are the foundation of each municipalities housing strategy. However, unlike all other general plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). The City's 2013–2021 Housing Element is in effect through 2021. State law required City Council adoption of the 2021–2029 Housing Element Update by October 15, 2021, with a 120-day grace period (i.e., February 15, 2022) after which cities and counties face statutory penalties. Additionally, if a city cannot identify sufficient sites adequate to accommodate its RHNA allocation, the Housing Element must commit to rezone properties within three years to allow "by right" development of 20 percent below market rate projects. Assembly Bill (AB) 398 requires a locality that fails to adopt a housing element that Housing and Community Development (HCD) has found to be in substantial compliance with State law within 120 days of the statutory deadline to complete this required rezoning no later than one year from the deadline for adoption of the housing element – and prohibits the Housing Element from being found in substantial compliance until that rezoning is completed. Previously, an agency had three years to rezone. AB 215 requires local agencies to make draft revisions of the housing element available for public comment for 30 days. The agency (i.e., City of South Pasadena) must consider and incorporate public comments prior to submission to the HCD for review. Because of legal action against the City related to its Housing Element preparation, the City is the subject of a Court Order[1] to bring its Housing Element into compliance with Government Code Section 65754 within the timeframe stated within the Court Order. This Court Order supersedes the time limits discussed above.

The requirements for preparation and implementation of specific plans are contained in Sections 65450–65457 of the *California Government Code.* Specific plans are a tool for the systematic implementation of a general plan and establish a link between implementing policies of the general plan and the individual development proposals in a defined area. The provisions of Section 65450 et. seq. of the *California Government Code* require that a specific plan be consistent with the adopted general plan of the jurisdiction within which it is located. In turn, all development, all public works projects, and zoning regulations must be consistent with the specific plan. The requirements for the adoption and administration of zoning laws, ordinances, and other regulations by counties and cities is contained in Sections 65800–65912 of the *California Government Code.*

Additionally, on September 30, 2008, Assembly Bill (AB) 1358, the California Complete Streets Act was signed into law and became effective on January 1, 2011. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of a general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks.

Assembly Bill 1233

Assembly Bill 1233, approved by the Governor in 2005, requires that housing elements analyze vacant sites, sites having potential for redevelopment, and the relationship of zoning, facilities, and services to these sites. AB 1233 requires that housing elements specify action programs that will be taken to make sites available during the 6th Cycle Housing Element planning period

[1] Settlement Agreement *(Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*)

(2021-2029), as necessary to accommodate the RHNA units assigned to each municipality, plus any additional actions that are necessary to make sites available to accommodate any RHNA units that were assigned during the 5th Cycle Housing Element (2013–2021) that were not accommodated.

If a jurisdiction fails to implement programs in its housing element to identify adequate sites or fails to adopt an adequate housing element, AB 1233 requires local governments to zone or rezone adequate sites by the first year of the new planning period. Specifically, AB 1233 applies to local governments that:

- Failed to adopt an updated Housing Element for the prior planning period;
- Adopted a Housing Element that California HCD found out of compliance due to failure to substantially comply with the adequate sites requirement;
- Failed to implement the adequate sites programs to make sites available within the planning period; or
- Failed to identify or make available adequate sites to accommodate a portion of the regional housing need.

The City of South Pasadena has reutilized rezoning and other strategies to identify adequate sites to meet the 6th Cycle RHNA allocation. Additionally, the housing units allocated for the City in the 5th Cycle Housing Element planning period (i.e., 63 DUs) were accommodated in the City's 2014–2021 Housing Element.

Senate Bill 375

Senate Bill (SB) 375, approved by the Governor in 2008, aligns land use and transportation planning to drive development towards transit-accessible places and reduce car dependency. SB 375 is the land use component of California's wider strategy to reduce GHG emissions, codified by the 2006 Global Warming Solutions Act (Assembly Bill [AB] 32).

SB 375 also requires that housing elements identify the existing and projected housing needs of all economic segments of the community. In certain cases, the State requires rezoning actions to be included within the housing elements to accommodate 100 percent of the need for very low and low-income households. If a jurisdiction does not fulfill the housing element action programs that are tied to affordability levels (prior to the June 30, 2020, deadline for the 5th Cycle production period), then penalties may be incurred in accordance with SB 375 and AB 1233 (discussed above).

Assembly Bill 1397

AB 1397 (2017) made several changes to housing element law by revising what could be included in a municipality's inventory of land suitable for residential development. AB 1397 changed the definition of land suitable for residential development to increase the number of multi-family sites. Identified sites must be "available" and "suitable" for residential development and have a "realistic and demonstrated potential" for redevelopment during the planning period. In addition, AB 1397 requires housing element inventory sites to be 0.5 acre to 10 acres, have sufficient infrastructure, or to be included in a program to provide such infrastructure, to support and be accessible for housing development. Further, the municipality must specify the realistic unit count for each site and whether it can accommodate housing at various income levels.

If a community does not have enough sites to accommodate its housing need, it must adopt a program to make adequate sites available, including a program for rezoning sites to provide lower-income housing. Pre-SB 375 housing law, cities asserted they were only required to identify actions that would be undertaken to make sites available to accommodate various housing needs-that they were not mandated to actually adopt the rezoning included in the Housing Element programs. However, SB 375 provides that communities preparing an eight-year housing element must complete all required rezoning if the available housing sites inventory does not identify adequate sites to accommodate the RHNA allocation. The planned rezoning must include "minimum density and development standards" for all sites, and, for sites designated for very low and low-income housing, rezoning must provide for "by right" zoning at certain minimum densities, with no discretionary approvals allowed except design review and subdivision map approval. In these instances, CEQA review cannot be required unless a subdivision map is needed. Additionally, the programmed rezoning must be completed within certain time frames.

Housing Crisis Act of 2019 (SB 330) and Senate Bill 8

The California Housing Crisis Act (SB 330) was enacted by Governor Newson in 2019 to combat the State's growing housing crisis. This legislation's goal is to increase California's affordable housing stock by 3.5 million new units by 2025. To streamline residential development, a new preliminary development application process is required, which includes a staff-level review of basic information regarding a project such as:

- Site characteristics;
- The planned project;
- Certain environmental concerns;
- Facts related to any potential density bonus;
- Certain coastal zone-specific concerns;
- The number of units to be demolished; and
- The location of recorded public easements.

SB 330 further streamlines housing development by reducing the number of public meetings or hearings to five or less (e.g., workshops, design review board meetings, planning commission meetings, advisory committee meetings, and city council meetings). A shortened approval time of 90 days instead of 120 days from the time of certification for an EIR is also required to streamline the development approval process.

Local agencies are no longer able to remove or modify land use designations or allowances to inhibit the development of housing, unless the local agency replaces the lost housing potential; therefore, ensuring no net loss in housing availability. Further, local agencies will no longer be able to limit the annual number of housing-focused land use approvals, create caps on the amount of constructed housing units, or limit the population size of their city. Subjective design limitations on parcels where housing is an allowable use is also no longer permissible for projects that are subject to processing per SB 330 (any housing project).

SB 8 extends until 2034 the HCA provision that prohibits cities from conducting more than five hearings on an application as well as HCA provisions that provide vesting rights for housing projects that submit a qualifying "preliminary application." Applicants who submit qualifying preliminary applications for housing developments prior to January 1, 2030, can now invoke vesting rights until January 1, 2034. SB 8 extends until 2030 provisions that limit localities' authority to impose shifting requirements as part of application "completeness" review, as well as

provisions that require localities to render any decision about whether a site is historic at the time the application for the housing development project is deemed complete. SB 8 also enacts a series of reforms intended to provide that HCA provisions apply to both discretionary and ministerial approvals as well as to the construction of a single dwelling unit and makes a series of revisions to the already complex replacement housing and relocation requirements.

Senate Bill 166

SB 166 (2017) requires a city or county to ensure that its housing element inventory can accommodate its share of the RHNA throughout the planning period. It prohibits a city or county from reducing, requiring, or permitting the reduction of the residential density to a lower residential density than what was utilized by the California Department of Housing and Community Development for certification of the housing element, unless the city or county makes written findings supported by substantial evidence that the reduction is consistent with the adopted general plan, including the housing element. In such cases, any remaining sites identified in the housing element must be adequate to accommodate the jurisdiction's share of the RHNA. A city or county may reduce the residential density for a parcel only if it identifies sufficient sites remaining within the housing element, as replacement sites, so that there is no net loss of residential unit capacity.

Assembly Bill 345

AB 345 further facilitates ADUs by removing, in certain limited circumstances, the requirement for a local agency to first pass an ordinance allowing the conveyance of an ADU separately from a primary residence (which can be an extended process) before such conveyance occurs and permits an ADU to be sold or conveyed separately from the primary residence to a qualified buyer (low- and moderate-income individuals and families as defined in California Health and Safety Code Section 50093) and if certain conditions are met, including that the primary residence or ADU was built by a qualified nonprofit corporation and that the property is held pursuant to a recorded tenancy in common agreement.

Assembly Bill 491

AB 491 requires that, for any residential structure with five or more residential dwelling units that include both affordable housing units and market-rate housing units, the BMR units must provide the same access to common entrances, areas, and amenities as non-BMR units, and the building "shall not isolate the affordable housing units within that structure to a specific floor or an area on a specific floor."

Assembly Bill 787

AB 787 expands existing law that permits jurisdictions to claim credit for up to 25 percent of their RHNA from the conversion of existing housing units for very low- and low-income households by also permitting cities and counties to satisfy up to 25 percent of the local agency's moderate-income regional housing need through RHNA by permitting the conversion of units in an existing multifamily building to be restricted for moderate-income households. To qualify, the conversion 1) must occur beginning January 1, 2022; 2) may not be for a unit previously affordable to very low-, low-, or moderate-income households; 3) must be subject to a 55-year recorded agreement; and 4) have an initial post-conversion rent at least 10 percent less than the average monthly rent charged during the 12 months prior to conversion.

State Density Bonus Law and Related Legislation

California's Density Bonus Law (Section 65915 et. seq. of the Government Code) grants bonuses, concessions, waivers, and parking reductions to projects with qualifying affordable housing. The State's Density Bonus Law continues to be the most commonly used tool to increase housing density and production. Prior to the passage of AB 1763, projects qualifying for a density bonus were entitled to between one and three "incentives" or "concessions" to help make the development of affordable and senior housing more economically feasible, such as reduced setback, additional height, and/or minimum square footage requirements as requested by the developer. Projects may also be entitled to waivers of development standards if the standard has the effect of physically precluding the construction of a density bonus project at the allowed density or with the incentives / concessions to which the project is entitled.

AB 1763 provides a fourth incentive and concession to 100 percent affordable projects. If the project is located within a half mile of a major transit stop, AB 1763 goes even further by eliminating all local government limits on density and allowing a height increase of up to 3 stories or 33 feet.

The Density Bonus Law was further amended by SB 1227, which provided density bonuses for projects that included student housing, and SB 290 adds the ability to request one concession or incentive for projects that include at least 20 percent of the total units for lower-income students in a student housing development. In connection with for-sale density bonus units that qualified a developer for an award of a density bonus under the Density Bonus Law, SB 728 requires that such unit be either 1) initially occupied by a person or family of the required income, offered at an affordable housing cost and subject to an equity sharing agreement, or 2) purchased by a qualified nonprofit housing organization receiving a property tax welfare exemption.

AB 571 prohibits agencies from imposing affordable housing impact fees, including inclusionary zoning fees and in lieu fees, on affordable units proposed as part of a Density Bonus Law project.

The floor area ratio (FAR) is a common mechanism in local zoning codes that limits the total floor area of a building in relation to the square footage of a lot. SB 478 prohibits agencies from imposing a FAR of less than 1.0 for a housing development project (comprised solely of residential units, a mixed-use development with at least two-thirds of the square footage attributed to residential uses or transitional or supportive housing) consisting of three to seven units and a FAR of less than 1.25 for housing development project consisting of 8 to 10 units. Additionally, an agency may not deny a housing development project located on an existing legal parcel solely on the basis that the lot area does not meet the agency's requirement for minimum lot size. To qualify, a project must consist of 3 to 10 units in a multifamily residential zone or mixed-use zone in an urbanized area and cannot be within a single-family zone or within a historic district.

Covenants, Conditions, and Restrictions Legislation

AB 721 makes recorded covenants that limit residential development unenforceable against qualifying affordable housing developments. The law builds on existing law that allows parties to eliminate unenforceable racially restrictive covenants from recorded documents–but goes further by making any recorded covenants, conditions, and restrictions (CC&Rs) that restrict the number, size, or location of residences that may be built on a property, or that restrict the number of persons or families who may reside on a property, unenforceable against the owner of a 100 percent below market rate housing development that is affordable to lower-income households.

There are exceptions for certain conservation easements and covenants required to comply with State or federal law.

AB 1584, a housing omnibus bill, establishes a restriction on contractual development controls that mirrors AB 721 by declaring unenforceable any CC&R contained within a deed, contract, security instrument, or other instrument that prohibits, effectively prohibits, or restricts the construction or use of an ADU on a lot zoned for single-family use.

Existing law notifies a buyer of real property that recorded covenants on the property may contain racially restrictive or other unenforceable discriminatory provisions and informs buyers of their right to file a Restrictive Covenant Modification (RCM) form. AB 1466 aims to hasten the removal of these covenants by requiring all county recorders throughout the State to establish a program to identify and redact unlawfully restrictive covenants and easing restrictions on the ability of other parties to seek to remove such covenants.

SB 9 provides for the ministerial approval of converting existing homes occupied by a homeowner into a duplex if certain eligibility restrictions are satisfied. It also allows a single-family home lot to be split into two lots, and a duplex to be built on each lot, provided that the initial home is occupied by an owner who attests that the owner will continue to live in a unit on the property as their primary residence for at least three years. The most notable exceptions to duplex and lot split by right approvals are 1) the property could not have been used as a rental for the past three years, 2) the property cannot already have an accessory dwelling unit or junior ADU, 3) the new lot may not be less than 40 percent of the property and must be at least 1,200 square feet, 4) modifications to the existing home may not require the demolition of more than 25 percent of an exterior wall, and 5) neither the new duplex nor the lot split with up to four new units (a duplex on each) may not result in a significant adverse impact to the physical environment.

Regional

Southern California Association of Governments

SCAG functions as the Metropolitan Planning Organization (MPO) for six Southern California counties: Imperial, Orange, Riverside, San Bernardino, Ventura, and Los Angeles. Regional plans are prepared and adopted by SCAG, which is the Council of Governments for the County of Los Angeles. The federal government mandates that SCAG research and draw up plans for transportation, growth management, hazardous waste management, and air quality for its region. SCAG has developed several plans to achieve these regional objectives. The most applicable to the Project are the 2020–2045 RTP/SCS and RHNA.

Regional Transportation Plan/Sustainable Communities Strategy

The RTP is a long-range transportation plan that is developed and updated by SCAG every four years to guide transportation investments throughout the region. The SCS is a required element of the RTP that integrates land use and transportation strategies to achieve California Air Resources Board emissions reduction targets pursuant to Senate Bill 375.

On September 3, 2020, the SCAG Regional Council adopted the 2020–2045 RTP/SCS (RTC/SCS; also referred to as Connect SoCal) and the addendum to the *Connect SoCal Program Environmental Impact Report*. The 2020–2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between

transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians (SCAG 2020).

Regional Housing Needs Allocation

Housing needs are determined by the California HCD, which allocates numerical housing targets to the MPOs, including SCAG, through the RHNA process. The RHNA identifies the existing and projected housing needs of each municipality (city and county) within the SCAG region. The 2021-2029 housing element cycle (6th Cycle) for the Southern California region departs significantly from past housing element cycles due to significant changes in State law. State requirements to boost housing production and provide more affordable housing units and justification for such new additions. Accordingly, the proposed Housing Element Implementation Programs balance strategic and targeted potential housing sites adequate to meet the RHNA allocation and Affirmatively Furthering Fair Housing (AFFH) concerns. It also introduces new policies and programs consistent with State law based on a comprehensive and inclusive strategy to encourage housing production and retention to serve the entire community.

Based on the 6th Cycle RHNA, approved by HCD on March 22, 2021, the City's proposed 2021–2029 Housing Element Implementation Programs has a need for 2,067 new units to be provided, distributed across the four income levels established by HCD, including the following:

- Very Low Income (757),
- Low Income (398),
- Moderate Income (334), and
- Above Moderate Income (578) (SCAG 2021).

The above-moderate income units are considered market rate, while units for the remaining income levels are considered below market rate at a range of affordability levels. The current RHNA allocation of 2,067 units is almost 33 times higher than the last cycle (63 units). Additionally, the California Department of HCD has recommended the 2021–2029 Housing Element Implementation Programs to demonstrate capacity for a surplus of units beyond the RHNA allocation. The surplus would be 708 DUs for a total of 2,775 DUs.

Cities and counties are not responsible for building the number of units specified in the RHNA, but rather are required to plan for them, by demonstrating the sufficiency of current land use and development standards and identifying specific housing element programs to provide capacity to accommodate the RHNA with implementation dates within three years. A municipality's housing element will not be certified by HCD if it does not demonstrate standards and programs for housing production capacity to accommodate the RHNA including rezoning if necessary. Penalties, including fines and loss of local discretion, can be levied against cities and counties that fail to implement the housing element programs that are included to reach the required housing production capacity. Per State requirements, the City's recently adopted Housing Element Implementation Programs include the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics;
- An analysis of the barriers to producing and preserving housing;
- A review of the City's progress in implementing current housing policies and programs;
- An identification of goals, policies and actions in addition to a full list of programs that will implement the vision of the Housing Element Implementation Programs; and

- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

City

Existing General Plan and Housing Element

The current *South Pasadena General Plan* (General Plan) was last updated and adopted by the City in 1998, with the 2013–2021 Housing Element adopted in 2014 to address the City's future housing needs for the 2013–2021 planning period, in accordance with State laws (South Pasadena 1998, 2014). On May 30, 2023, City Council adopted the EA and approved the 2021–2029 Housing Element. While the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs.

Therefore, the currently adopted (1998) General Plan includes the following seven elements:

- Land Use & Community Design (addressing land use and development issues);
- Circulation & Accessibility (addressing transportation issues);
- Economic Development & Revitalization (addressing economic issues);
- Historic Preservation (addressing historic resource issues);
- Housing (addressing RHNA allocation and housing issues);
- Open Space & Resource Conservation (addressing natural and open space resource issues); and
- Safety & Noise (addressing public health and safety issues).

The goals and policies of the *Land Use & Community Design Element* (Land Use Element) are further interpreted in the form of a diagram, referred to as Land Use Policy Map, which defines the general location and development intensity/density of these uses within the City. Exhibit 2-2, Existing Land Use Policy Map, presented in Section 2.0 of this PEIR, depicts the current land use plan for the City.

Existing Mission Street Specific Plan

The Mission Street Specific Plan (MSSP) was adopted in 1996 (South Pasadena 1996). Under State law (Section 65450 et. seq. of Government Code), a municipality may use a specific plan to develop detailed regulations, programs, and/or legislation to implement its adopted general plan for a specific area within its local jurisdiction. As with the proposed update, the MSSP is a companion document to the 1998 General Plan, tailored to the particular needs of a specific area of the City. The MSSP includes the Mission Street right-of-way from Pasadena Avenue to Fair Oaks Avenue, parcels fronting Mission Street between Fremont Avenue and Indiana Avenues, and areas to the north and south of Mission Street between Fremont Avenue and Orange Avenues. Exhibit 2-3, Mission Street Specific Plan Area, presented in Section 2.0, provides an illustration of the geographic area covered by the MSSP.

When adopted, the MSSP supplemented and refined the City's Zoning Code and other relevant ordinances. The MSSP regulations equivalent to zoning code regulations. All other provisions of the Zoning Code and other ordinances apply to the MSSP area.

The key actions identified in the MSSP, which must be taken by the City and by property owners, merchants, and residents to implement the MSSP, include the following:

- Provide a central parking facility to serve the Blue Line (now Gold Line) station;
- Establish a Business Improvement District (BID) to help financing parking and streetscape improvements;
- Hire a manager to attract desirable businesses, implement streetscape improvements, and promote the MSSP area; and
- Increase the water pressure so that on-pumps are not required for second and third story uses (South Pasadena 1996).

Municipal Code

The Section 36.530.020 of the South Pasadena Municipal Code (SPMC) provides that where a residential structure is proposed at the time of construction as a condominium or other common interest development, and would involve conversion of an existing residential use, the Applicant must provide the City with a Relocation Assistance Program. This program must show how the Applicant will assist tenants displaced through the conversion in relocating to equivalent or better housing. Additionally, Section 36.530.020 of the SPMC requires the Applicant to give notice to all existing or prospective tenants as set forth in the Subdivision Map Act (Map Act) (Sections 66410 through 66413.5 of the California Government Code). The City will not approve a project converting residential real property unless the findings, regarding notification, set forth in Section 66427.1 of the Map Act are first made (Section 36.530.020[B][6][b] of the SPMC).

3.12.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse population and housing impact if it would:

Threshold 3.12a: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); and/or

Threshold 3.12b: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.12.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P2.1 Promote the establishment of a creative industry cluster in the City.

A2.1a Build on the existing presence of arts, cultural and entertainment clusters, and attract small- and medium-scale production/post-production studios, architecture, graphic design, industrial design and multi-media firms, t the likes of which some residents currently commute outside of the City for.

A2.1b Brand and market South Pasadena as a hub of creative businesses.

A2.1c Engage with real estate brokers, landlords, property owners and developers to communicate South Pasadena's value proposition to the creative sector and encourage marketing to creative business sector tenants.

A2.1d Attract creative professional organizations related to the arts, media, design or architecture to locate in the City to serve as professional network hubs and destinations.

P2.2 Focus employment-generating development primarily within the Ostrich Farm District, and as part of infill development in Downtown.

A2.2a Leverage locational strengths to reduce cost of new infill development.

A2.2b Support the renovation and adaptive reuse of existing buildings by educating property developers and property owners on financing mechanisms such as the Property Assessed Clean Energy (PACE) program and historic preservation tax credits.

P2.3 Create capacity within City government and a single point of contact for economic development.

A2.3a In the near term, continue to proactively engage with the Chamber of Commerce to augment the City's economic development capacity.

A2.3b Explore the potential for creating an economic development office or contracted economic development specialist over the mid-term to lead discussions and negotiations with private developers, assist projects through the development approval process, lead disposition of City-owned land and other resources, and implement a business attraction program.

P2.4 Develop a business assistance program targeted towards small and independent retail businesses (based on targeted clusters – food and beverage; art and design; furniture).

A2.4b Support a retail landlord and broker market awareness program and establish a shared vision for the types of businesses desired.

A2.4c Encourage partnerships between property owners or managers and small business tenants, who often seek low rents until their business operations are established and stable.

P2.6 Foster a targeted amount of new growth within the Ostrich Farm district, Huntington corridor, Mission Street, and Fair Oaks Avenue to support the City's tax base.

A2.6b Encourage redevelopment of large single use retail sites along Fair Oaks Avenue to include a mix of uses, appropriate development intensity and an active street front.

P2.7 Strengthen and grow the City's retail offerings.

A2.7a Create a retail and restaurant destination by attracting specialty stores and unique food and beverage places through targeted branding and engagement with desired businesses.

A2.7b Seek a mix of national credit retailers and independent businesses that can both meet the City's retail needs and adhere to quality design standards to seamlessly fit into a walkable urban environment.

P2.10 Encourage a diversity of housing types to promote mixed-use districts and leverage transit access.

A2.10a Support higher-intensity and high-quality multifamily development near the Metro A Line Station, close to retail activity.

P9.2 Support ways to help creative businesses gain access to reasonably priced studios, office space, and housing that is also safe and inviting.

A9.2a Work to ensure South Pasadena's creative sector has adequate and inviting spaces to create, sell their products, and network.

A9.2b Develop and market spaces for artists including studios, affordable housing, and live/work studios.

P9.3 Facilitate the temporary and opportunistic use of vacant or underutilized spaces and venues for artistic purposes.

A9.3a Facilitate artists' temporary and opportunistic use of such spaces and venues as vacant walls, storefronts, empty buildings, open spaces, etc.

A9.3b Provide building owners with tax incentives, grants, loans, and streamlined permitting process to renovate buildings that can be used as live/work spaces by artists.

Downtown Specific Plan Update

P2.2 Attract a greater variety of desirable retail and office tenants by building upon existing strengths and market opportunities.

A2.2a Implement district-wide retail branding and tenanting strategy that builds upon nascent cluster of home furnishings and design stores, while adding other retail desired by the community, such as experience-based retail and retail for a wider demographic.

A2.2b Host broker, educational events to promote South Pasadena and to align office and retails tenant mix with what is desired by the community.

A2.2c Host property owner events to promote landlord practices that attract new small businesses, including flexible lease structures, shorter lease terms, etc.

P2.3 Continue to nurture small, independently-owned businesses.

A2.3a Engage with the Chamber of Commerce or future Downtown BID to better connect local entrepreneurs with US Small Business Administration loans and other Federal or State assistance programs.

A2.3b Engage with successful Farmers' Markets tenants in locating them in retail space in Downtown South Pasadena.

P2.8 Strengthen Downtown South Pasadena's tax base.

A2.8a Support the renovation and adaptive reuse of existing buildings.

A2.8b Locate residential and employment growth in mixed-use buildings.

P3.5 Provide high quality housing for current and future residents with a diverse range of income levels.

A3.5a Provide for quality housing at a range of income levels and price points, emphasizing housing product that captures the underserved multi-family market.

A3.5b Support workforce and market rate units that will expand and diversify Downtown's housing stock and support growth in Downtown employment.

A3.5c Provide flexibility in development standards to encourage and facilitate non-traditional housing types and options, including co-housing, assisted living facilities, live-work spaces, and artist lofts.

P5.3 Support the production of new affordable housing projects through standards and process incentives.

A5.3a Adopt flexible regulations that can respond to market changes in emerging industries and attract contextual development.

A5.3b Leverage the Metro A Line Station for walkable mixed-use development opportunities on nearby catalytic sites to provide variety of affordable housing types, local employment, community benefits, and application of extensive TDM measures.

P6.5 Promote a healthy community by providing for Aging in Place in residential development designs.

A6.5 Encourage a mix of housing types and housing units that increase the proportion of areas usable by a wide spectrum of people, regardless of age or ability.

P9.1 Creative businesses have places to work, live, gather, and promote their art in Downtown.

A9.1a Work to ensure South Pasadena's creative sector has adequate and inviting spaces to create, sell their products, and network.

A9.1b Develop and market spaces for artists including studios, affordable housing, and live/work studios.

P9.2 Facilitate use of vacant retail space by arts and cultural groups.

A9.2b Provide building owners with tax incentives, grants, loans, and streamlined permitting process to renovate buildings that can be used as live/workspaces by artists.

2021–2029 Housing Element Implementation Programs

Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Goal 2.0 Encourage and Assist in the Provision of Affordable Housing

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance

with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the City's contracted housing rights and tenant protection agency.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Goal 3.0 Provide opportunities to increase housing production

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4 Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5 Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB9 and SB10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Goal 4.0 Compliance with State Housing Laws

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Policy 5.1 Provide information on fair housing practices and resources at City Hall on the City's website.

Policy 5.2 Coordinate with the City's contracted housing rights and tenant protection agency to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the City's contracted housing rights and tenant protection agency at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination and take actions as a community to actively welcome and embrace all members of the community to live, work and play in South Pasadena.

Policy 5.5 In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6 Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

3.12.6 ENVIRONMENTAL IMPACTS

Threshold 3.12a: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Housing, Population, and Employment Growth

Future development under the proposed Project would increase housing, population, and employment in the City. As discussed in Section 2.4, buildout of a city under an adopted general plan is not tied to a specific timeline. However, for the purposes of this PEIR, development of the proposed Project is assumed to occur by the horizon year of 2040.

To encompass all possible future development capacity within the City, this PEIR addresses the buildout of up to an additional 2,775 DUs and 430,000 sf of commercial/office, which is estimated

to generate up to an additional 6,882 residents[2] and 1,978 jobs[3] in the City through 2040 compared to existing conditions. The maximum 6,882 residents equate with full occupancy of 2,775 units; however, the City had a vacancy rate of 5.5 percent in both 2017 and 2018, and the County's vacancy rate was 6.3 percent in 2017 and 6.4 percent in 2018 (DOF 2021). A vacancy rate of 5.5 percent for the City and 6.4 for the County are applied in this analysis as they are the most recent prior to the COVID-19 pandemic.

Based on this vacancy rate, the maximum of 2,775 DUs in the proposed 2021–2029 Housing Element Implementation Programs would result in a resident population increase of approximately 6,503 persons occupying an estimated 2,622 DUs. Also, this approach conservatively estimates the total population increase even with a reasonable vacancy rate because some of the new dwelling units would replace dwelling units removed as part of a redevelopment project. Table 3.12-6, Comparison of Existing and Projected Conditions, provides context for the intensity of proposed growth in the City with buildout of both the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

TABLE 3.12-6
COMPARISON OF EXISTING AND PROJECTED CONDITIONS

	Existing Conditions	Project Buildout (2040)	Growth	Difference
Households (DUs)	10,623[a]	13,245	2,622	+25.0%
Housing Units (DUs)	11,156[a]	13,931	2,775	+25.0%
Population (residents)	25,580[a]	32,083	6,503	+25.4%
Non-residential (sf)	1,256,000[b]	1,686,000	430,000	+34.2%
Employment (jobs)	13,700[c]	15,678	1,978	+14.4%

DUs: dwelling units; sf: square feet

Note: Population in this table based on 5.5 percent housing vacancy rate

Sources:
[a] DOF 2022
[b] HR&A 2017
[c] EDD 2022

As shown, the maximum 2,775 DUs would be expected to result in approximately 1,953 occupied DUs and would represent an approximate 25 percent increase–or about 1.25 percent per year–in the City's households. Assuming a 5.5 percent vacancy rate, this would result in a population of approximately 32,083 residents, which would represent an approximate 25.4 percent increase–or about 1.25 percent per year–in population. If all potential homes were occupied, the City would have a population of up to approximately 32,462 persons. However, no municipality experiences full occupancy of all housing units.

The maximum 430,000 sf of non-residential uses represent an approximate 34.2 percent increase–or about 1.7 percent per year–in the City's commercial and office space and would represent an approximate 14.4 percent increase–or about 0.7 percent per year–in the number of jobs within the City. The annual increase rates are based on 20 years and assume maximum buildout of all development capacity in the City by 2040.

2 Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

3 Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).

Table 3.12-7, Comparison of SCAG Growth Projections and Project Buildout, provides a comparison of the 2040 SCAG growth projections and the General Plan Update buildout projections.

TABLE 3.12-7
COMPARISON OF SCAG PROJECTIONS AND PROJECT BUILDOUT

	Existing Conditions	Project Buildout (2040)	SCAG Projections (2040)	Difference
Households	10,623[a]	13,245 (2,622 DUs)[a]	11,109[c]	+2,136 DUs / +19.2%
Housing Units	11,156[a]	13,931 (2,775 DUs)	N/A	N/A
Population	25,580[a]	30,083 (6,503 persons)[a]	27,004[c]	+5,079 persons / +18.8%
Employment	13,700[b]	15,678 (1,978 jobs)	11,984[c]	+3,694 jobs / +30.8%
Jobs-Housing Ratio	1.23	1.13	1.01	N/A

DUs: dwelling units; N/A not applicable

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena. Population based on 2.48 persons per household for the number of housing units at this vacancy rate.

Sources:
[a] DOF 2022
[b] EDD 2022a
[c] SCAG 2020, Aguilar 2021

As shown in Table 3.12-7, the number of households, residents, and jobs in the City at buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would exceed SCAG's regional projections derived from the 2020–2045 RTP/SCS. The number of housing units is presented solely for purposes of calculating the jobs-housing ratio, discussed further below, because SCAG forecasts number of households only.

The household and population growth in the City would exceed the SCAG projections by 2,136 DUs (19.2 percent) and 5,079 persons (18.8 percent), respectively. As previously mentioned, SCAG's projections in the RTP/SCS are based in part on coordination between the City and SCAG during preparation of the RTP/SCS and reflects the anticipated growth in the City prior to release of the unexpectedly high 6th Cycle RHNA. At that time, the City would have provided to SCAG demographic projections based on the proposed 589 DUs and 430,000 sf of non-residential formerly envisioned for the City. The 2020–2045 RHNA was approved by SCAG's Regional Council on September 3, 2020. While preparation of the 6th Cycle RHNA partially overlapped preparation of the RTP/SCS, the 6th Cycle RHNA preparation continued beyond its adoption and was approved by HCD almost seven months later on March 22, 2021. Therefore, the SCAG 2020–2045 RTP/SCS projections are internally inconsistent with the SCAG 6th Cycle RHNA.

SB 375 promotes consistency between RTP's and regional housing policy. It requires the RTP to plan for the RHNA, and the RHNA to be consistent with the RTP's projected development pattern. SB 375 also aligned the RHNA with the regional transportation planning process and created an eight-year planning period for cities within MPOs. Allocation of housing share to various cities and counties must be consistent with the SCS. Nonetheless, the necessity of the RHNA to meet the very considerable, recent changes in housing policy at the State level and other processes have resulted in this inconsistency. At the time of preparation of these SCAG documents, and this PEIR, the legislative and planning environment for providing housing and preferable land use patterns to meet GHG reduction and air quality goals is undergoing a marked transformation. The City is required to demonstrate it can accommodate the RHNA allocation. At the same time,

accommodating this RHNA allocation results in a substantial unplanned population growth. Therefore, buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in a significant and unavoidable impact related to population growth. There are no feasible mitigation measures to avoid or reduce this impact, because any such mitigation would reduce the potential housing stock to be constructed and thereby risk placing the City in violation of State law and susceptible to a variety of penalties, including monetary fines.

Regarding employment, as discussed previously, the SCAG projections of employment in the City are substantively underestimated (refer to Tables 3.12-6 and 3.12-7). Therefore, this analysis does not directly compare the SCAG projection for employment and the City's anticipated future employment to reach a significance finding. For comparison, the projected employment of 15,678 jobs represents an increase of 1,978 jobs (or about a 14.4 increase or 0.72 percent per year) from EDD's 2021 estimate of 13,700 jobs. The City's jobs-housing balance, a different metric for consideration of a City's employment, is presented below.

Jobs-Housing Balance

Jobs-housing balance defines an area where the number of housing units available for the employed population is equivalent to the number of jobs in an area. Alternatively, the provision of employment to fill the housing supply may also be considered jobs-housing balance. Assuming a reasonable match between the affordability of housing and the incomes of jobs in the local market, if the number and proximity of residences is proportionate to the number and proximity of jobs, the majority of employees would have the opportunity to work and reside in the same community. A well-balanced ratio of jobs and housing can contribute to reductions in the number of vehicle trips resulting from commuting due to employment opportunities in closer proximity to residential areas, although this may not occur. Such a reduction in vehicle trips would result in lower levels of air pollutant emissions (including lower GHG emissions) and less congestion on area roadways and intersections.

An area with a ratio between 1.0 and 1.29 is considered "balanced" (SCAG 2001). Table 3.12-7 also compares the City's existing (1.23) and buildout (1.13) jobs-housing balance. Therefore, the City would have slightly more balanced jobs-housing ratio with buildout of the Project. Although the SCAG employment projection cannot be feasibly compared to the anticipated 2040 conditions, consideration of jobs-housing balance indicates the increase in employment would not be considered a substantial inducement of growth, as the jobs-housing would be only slightly decreased (i.e., more housing-rich than the existing conditions). However, the proposed land use plan is consistent with SCAG policies to encourage higher-density and mixed-use development, particularly near transit centers such as the Mission sA Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive. Consistency with SCAG policies is discussed further in Section 3.10, Land Use and Planning. There would be a less than significant impact related to employment growth, and no mitigation is required.

Improvements to roads and other infrastructure would be implemented either to alleviate existing capacity issues or in support of anticipated future growth. In conclusion, there would be a significant and unavoidable impact related to direct population growth, through provision of a land use plan that supports the 6th Cycle RHNA allocation; and less than significant impacts related to indirect population growth or direct employment growth, for which no mitigation is required.

Threshold 3.12b: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

As discussed above in Section 3.12.3, Relevant Programs and Regulations, the 2021-2029 housing element cycle (6th Cycle) for the Southern California region departs significantly from past housing element cycles due to significant changes in State law. Additionally, the California legislature has passed numerous housing-related bills in recent years.

The central strategy of the Project is to preserve and enhance the distinctive neighborhoods and direct calibrated growth primarily to the identified growth areas. Preserving housing supports sustainability objectives, and it is also less expensive to create affordable units in existing housing stock. However, to accommodate the 6th Cycle RHNA allocation, the City must determine policies and zoning thresholds that allow and encourage production of new housing units in a manner that South Pasadena has not contemplated in the past. The multi-pronged strategy that the adopted Housing Element Implementation Programs rely on includes inclusionary housing requirements that the City Council adopted in 2020; encouraging ADUs with simpler, objective requirements; and rezoning for higher density and mixed-use commercial/residential development. The rezoning of non-residential parcels to allow densities that support and encourage both market rate and affordable housing units would follow the adoption of a revised General Plan Land Use Element together with the DTSP, which is an update and expansion of the 1996 Mission Street Specific Plan (MSSP). Additionally, as discussed in Section 2.0, Environmental Setting and Project Description, while the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but also the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs.

The Project encourages most of the new housing to be in walkable mixed-use environments in the Downtown and along major transit corridors and arterial roadways but also accommodates increased housing opportunities within existing residential neighborhoods. The Housing Element Implementation Programs balance strategic and targeted potential housing sites adequate to meet the RHNA allocation with the pattern of the existing land use plan outside of the focus areas.

The General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs call for the conservation of the City's established residential neighborhoods. Thus, most of the residential land uses in the City are expected to remain in place. New residential development on the limited number of vacant lots in the City would not involve any displacement of housing; however, transitions to higher densities within the focus areas or those lots outside the focus areas that have been determined a possibility for redevelopment and currently contain residential land uses could result in displacement. However, the magnitude and location of any such displacements is speculative at this time due to lack of sufficient information.

As discussed above, the 2021–2029 Housing Element Implementation Programs have the need for 2,775 DUs across the four income levels defined by HCD. The new residential, and non-residential, uses are anticipated to occur primarily as infill redevelopment or development in the five focus areas; however, suitable sites for development or redevelopment of housing are identified outside of the focus areas. There are existing residential and mixed-use (i.e., retail ground floor with residential above) land uses within the focus areas. Therefore, there is a potential that existing residential uses would be removed to accommodate new development. The

locations of future redevelopment projects, and, by extension, the precise number of existing housing units and people that may be displaced cannot be reasonably foreseen and would be speculative to define at this time.

As noted above, Section 36.530.020 of the SPMC describes requirements for tenant notification, consistent with the Subdivision Map Act, and preparation of a Relocation Assistance Program by the Applicant for a development project involving conversion of residential use as a condominium or other common interest development. Where a development that would involve conversion of residential uses is due to a program or project undertaken by a public entity, the development process must be conducted in compliance with the California Relocation Assistance Act. This includes adequate notification of affected properties and provision of fair compensation and relocation assistance. This State law requires public agencies to provide procedural protections and benefits when they displace businesses, homeowners, and tenants in the process of implementing public programs and projects. Additionally, the California Housing Crisis Act (SB 330) discussed further above, to streamline residential development also includes requirements relevant to displacement of houses or people as a result of site redevelopment. Specifically, for SB 330 to be applicable to a project, the replacement project must have at least as many units as will be demolished; may not include protected units (as defined by SB 330) unless those units will be replaced; include the right to occupy units to be demolished up to six months before construction; include the right to return at prior rental rates if the project doesn't proceed; Applicant provides relocation benefits; and provides first right of refusal to a comparable unit in the new development.

However, displacements that may occur would not necessitate construction of housing elsewhere, as a net increase in housing would be accommodated in the City. As such, there would be no impact under this threshold because there would be no indirect environmental impact from construction of housing elsewhere. There would be no impacts related to displacement of housing or people that would necessitate construction of housing elsewhere, and no mitigation is required.

3.12.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

The cumulative impacts related to demographic growth are analyzed within the County of Los Angeles, because County-wide demographic data are available from SCAG, DOF, and EDD. Also, because of the interconnectedness of cities and unincorporated areas in the Los Angeles metropolitan area, due to roadways, increasing transit, and other sociological factors, demographic growth in smaller sized cities like South Pasadena cannot be treated like an isolated phenomenon as it is part of the fabric of the region.

Increases in the population, housing, and employment base of the County are expected over time due to in-migration and birth. Future growth and development in the City of South Pasadena and in the County would lead to the development of new homes, the creation of new jobs, and the increase in the resident population of the City and the rest of the region. SCAG estimates there could be as many as 11,423,962 persons, 4,002,104 households (not housing units), and 5,276,927 jobs throughout the County by 2040 (Table 2-4; SCAG 2020; Aguilar 2021).

As discussed above, because of the inconsistency between SCAG's RTP/SCS and 6th Cycle RHNA, the increase in population and housing is considered a significant and unavoidable impact. This is more of a technicality due to timing and rapid changes in housing policy. However, a direct cumulative adverse impact would not be expected if there is housing that can adequately accommodate the population and there are goods and services available to meet residents' needs. The cumulative increase in population in the County would be accompanied by an increase in housing stock as projected by SCAG. This balance is partially driven by economic and other market forces out of the control of any single municipality. Whether this housing is adequate would depend on the rate of housing development and the success of housing programs in the various cities and communities in the region.

As discussed above, there would be a less than significant impact related to employment growth because the City would have a balanced jobs-housing ratio with buildout of the Project, and proposed land use plan is consistent with SCAG policies. As such, no significant adverse cumulative impacts related to employment growth would occur with the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs and future growth and development in the County.

Redevelopment projects that occur on developed or underutilized lots may involve some displacement of local housing stock or population in the San Gabriel Valley. However, the City's vacant housing stock and the County's vacant housing stock are expected to provide sufficient alternative accommodation for displaced households and residents, and significant displacement is not anticipated in the County. As such, displacements that may occur would not necessitate construction of housing elsewhere, as a net increase in housing would be accommodated in the City. No significant cumulative adverse impacts related to displacement would occur with the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs and future growth and development in the County, and no mitigation is required.

3.12.8 MITIGATION MEASURES

There would be a significant and unavoidable impact related to substantial growth and no impacts related to displacement of housing or people necessitating construction elsewhere, and no mitigation is required. As discussed, there are no feasible mitigation measures to avoid or reduce this impact, because any such mitigation would reduce the potential housing stock to be constructed and thereby risk placing the City in violation of State law and susceptible to a variety of penalties, including monetary fines.

3.12.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Significant and unavoidable related to population and housing growth at both a program and cumulative level. As discussed, this is a technicality and due solely to the inconsistency between SCAG's RTP/SCS and 6th Cycle RHNA.

Less than significant related to employment growth and related job-housing ratio and no impact for displacements of housing or people that would necessitate construction of housing elsewhere, at both a program and cumulative level.

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3.13 PUBLIC SERVICES AND RECREATION

3.13.1 METHODOLOGY

This section discusses the existing public services in the City of South Pasadena and addresses potential impacts associated with the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project (Project) to the following services:

- Fire protection and emergency medical services (South Pasadena Fire Department);
- Police protection services (South Pasadena Police Department);
- School services (South Pasadena Unified School District);
- Library services (South Pasadena Public Library); and
- Parks and recreation services (City of South Pasadena).

The public service providers were consulted for information regarding current services and to determine if the proposed Project would significantly impact the respective providers abilities to provide services such that new or physically altered facilities would be required, whose construction could result in an environmental impact. Other information presented in this section was derived from the City's website and the adopted General Plan; the most recent publicly available data was used in the following analysis.

3.13.2 EXISTING CONDITIONS

Fire Protection and Emergency Medical Services

Fire protection and emergency medical services in the City are provided by the South Pasadena Fire Department (SPFD). The SPFD is a full-service fire department that provides fire/rescue services, paramedics, safety education, inspections, plan reviews, and emergency management. The SPFD is also an all risk emergency services agency, as SPFD personnel are trained to handle responses such as structure, wildland and vehicle fires, hazardous materials releases, rescues and service calls, and provide advanced life support and medical transport. The SPFD includes the following divisions: Administrative Management, Operations (e.g., fire and emergency medical response), Fire Prevention Bureau (e.g., plan checks, public education, brush clearance program), and Emergency Management Program (e.g., disaster preparedness and response).

There is one fire station in the City, located at 817 Mound Avenue, that houses an engine company (Engine 81), a rescue ambulance, and a light and air unit. The SPFD currently has 21 sworn personnel as well as support personnel. The SPFD operates on a 48/96 schedule[1] with in-house daily staffing consisting of 7 personnel as follows: 1 Division Chief, 1 Captain, 2 Engineers, and 3 Firefighter/Paramedics. Battalion Chief coverage is provided by a contract agreement for management between the cities of South Pasadena and San Marino. In 2017 (the most recent data online) there were more than 2,300 responses by the SPFD. Of these, about 1,500 were for incidents within the City borders. The balance of the responses (about 800) were with adjoining agencies. Within the City, the most frequent dispatches are for minor falls and fire alarms.

[1] A 48/96 schedule uses 3 teams and 3 shifts to provide 24/7 coverage. It consists of a 6-day cycle where each team works 2 consecutive 24-hour shifts, followed by 4 consecutive days off duty.

A mutual aid agreement is an agreement in which participating agencies guarantee the provision of available resources to a requesting agency in the event of an emergency. An automatic aid agreement provides services without regard for service boundaries but based on earliest response. The SPFD has automatic aid agreements with the twelve other agencies[2] affiliated with the Verdugo Fire Communications Center (VFCC), all of whom operate under the Unified Response agreement. The SPFD also participates in the State of California Master Mutual Aid program, which is used when all available local resources have been depleted or committed to an incident, allowing the State to coordinate resources available from neighboring counties, as necessary.

Police Protection Services

Police protection and law enforcement services in the City are provided by the South Pasadena Police Department (SPPD) from its station at 1422 Mission Street. The SPPD's mission statement is "…to provide our community with the safest possible environmental using interactive crime prevention methods, public education programs, and the equitable and professional application of the law". The SPPD includes the following divisions, Field Services and Support Services, each described below.

The Field Services Division provides the front line police services to the community and includes the following: Patrol Officers, Reserves, Traffic Unit, K9 Team, Bicycle Unit, Detective Bureau including Police Assistants, Records, Cadets, and Parking Enforcement, Foothill Air Support Program (FAST), Evidence/Property, Area C Mutual Aid, and Emergency Management. The SPPD has participated in the FAST for the past five years. FAST provides a regional law enforcement helicopter air support program to enhance public safety services in the San Gabriel Valley. FAST also assists with Homeland Security checks at major sporting events in the San Gabriel Valley. Currently, FAST is a partnership between the cities of Alhambra, Arcadia, Covina, Glendora, Monrovia, Pasadena, Pomona, San Marino, Sierra Madre, and South Pasadena. The Support Services Division including Crime Analysis, Crime Prevention, and a School Resource Officer; Office of Professional Standards; Communications; Emergency Operations; and Volunteers. The Support Services Division also oversees department purchases, vehicle and station maintenance, and budget and grant management.

As of 2021, the South Pasadena Police Department consists of 33 sworn officers, 16 non-sworn (i.e., civilian) full-time employees, 4 part-time non-sworn employees, and 2 volunteers; and the SPPD is also augmented with 4 Reserve Officers (SPPD 2022). The SPPD has divided the City into four sections designated as service areas 1 through 4; the dividing lines between the service areas are Meridian Avenue (north-south) and Monterey Road (east-west). In the case of an emergency call for service, officers can respond anywhere in the City, not just the assigned service area. In 2021, SPPD received 54,312 calls for service, including 27,339 calls for dispatched service and 5,909 emergency (i.e., 911) calls. Table 3.13-1, South Pasadena Part One Crime Statistics – Years 2020 and 2021, summarizes the calls for service for Part One Crimes. As shown, Part One Crimes decreased by 20.2 percent from 2020 to 2021 (SPPD 2022).

[2] The VFCC currently includes the cities of Alhambra, Arcadia, Burbank, Glendale, Monrovia, Montebello, Monterey Park, Pasadena, San Gabriel, San Marino, Sierra Madre, South Pasadena, and the Bob Hope Airport Fire Department.

TABLE 3.13-1
SOUTH PASADENA PART ONE CRIME STATISTICS – YEARS 2020 AND 2021

Crime	2020	2021
Homicide	1	0
Rape	4	2
Robbery	17	10
Assault	66	63
Burglary (Residential)	44	42
Burglary (Commercial)	65	43
Larceny-Theft	429	349
Auto Theft	92	65
Arson	4	2
Total	**722**	**576**
Source: SPPD 2022.		

School Services

The South Pasadena Unified School District (SPUSD) provides public educational services to the City, through three elementary schools, one middle school, and one high school. The SPUSD schools and their enrollment are summarized in Table 3.13-2, SPUSD Schools and Enrollment for 2022-2023 School Year.

TABLE 3.13-2
SPUSD SCHOOLS AND ENROLLMENT FOR 2022-2023 SCHOOL YEAR

School Name	Address	Enrollment (2022–23)
SPUSD High School (Grades 9–12)		
South Pasadena High School	1401 Fremont Avenue	1,477 students
SPUSD Middle School (Grades 6–8)		
South Pasadena Middle School	1500 Fair Oaks Avenue	1,084 students
SPUSD Elementary Schools (Grades K–5)		
Arroyo Vista Elementary School	335 El Centro Street	721 students
Marengo Elementary School	1400 Marengo Avenue	754 students
Monterey Hills Elementary	1624 Via Del Rey	586 students
Total		**4,651 students**
Source: CDE 2023.		

Library Services

The South Pasadena Public Library (SPPL), located at 1100 Oxley Street, provides library services to the City and is a community resource for literacy, lifelong learning, recreation, and professional development. The SPPL was founded in 1895, with the first dedicated library built in 1907 on the southeast corner of Diamond Avenue and El Centro Street with funding from the Carnegie Corporation. In 1917 the building was significantly expanded, and in 1930 portions of the original building were moved to the current location in the center of Library Park. In 1982, the

library underwent a major renovation that included all new construction for reading rooms, children's room, staff areas, conference rooms, and stacks. A portion of the original historic structure was retained as a 3,000-square-foot community room that hosts library and City events and is available to the community as a rental space. The 24,500-square-foot facility offers free high-speed Wi-Fi, Internet connected computers, a conference room, dedicated space for teens and children, and seating for more than 130 people. In the 2021-2022 fiscal year, library collections included 117,781 physical items in print and audiovisual formats, 48,111 e-books, 12,422 downloadable audio materials 29,548 downloadable video materials, and a wide variety of online resources (e.g., homework help language learning, tools for researchers and job seekers).More than 8,500 people attended a total of 219 virtual or live library programs, including concerts, author talks, storytimes, hands-on crafting activities, book discussions, summer reading program, performances, workshops, and other community-focused programs. Except for operational changes due to the COVID-19 pandemic, the SPPL is open 7 days a week for a total of 58 hours per week, or more than 2,354 public service hours in Fiscal Year 2021–2022, with 38 employees and 51 volunteers. There were 15,446 registered library cards, more than 124,332 visits, 19,944 reference interactions, approximately 362,925 items circulated (including e-materials), and over 3,149 internet computer sessions (CSL 2023).

Parks and Recreation Services

City Recreational Facilities

The City of South Pasadena has approximately 118.34 acres of parkland, recreation facilities, and open space areas. The City currently provides approximately 4.6 acres of parkland per 1,000 residents. Table 3.13-3, South Pasadena Parks and Recreational Facilities, on the following page, summarizes the recreation amenities within the City.

There are gazebos and/or fields available for reservation by the public at Garfield Park, Orange Grove Park, Arroyo Park, and Eddie Park. There are indoor facilities available for reservation by the public at the War Memorial Building, South Pasadena Senior Center, Eddie Park House, Orange Grove Mid-Level Meeting Room, and Garfield Park Youth House. Garfield Park is also the first zero-emission American Green Zone Alliance Green Zone municipal park in the United States.

Park development, renovation, and maintenance, as well as leisure classes and recreational programs are provided by the South Pasadena Community Services Department. The Community Services Department also oversees the City-leased and -managed properties, including the Arroyo Seco Golf Course, Arroyo Seco Racquet Club, San Pasqual Stables, All-Star Baseball School Batting Cages, and South Pasadena Historical Museum; manages the South Pasadena Senior Center and related services, including Dial-A-Ride; and provides a variety of youth services and events, including after-school programs and middle school summer camp (South Pasadena Community Services Department 2022).

TABLE 3.13-3
SOUTH PASADENA PARKS AND RECREATIONAL FACILITIES

Name/Location	Size (acres)	Facilities
Neighborhood Public Parks and Other Facilities		
Arroyo Seco Park 613 Stoney Drive	73.9	Lighted athletic fields, playground equipment, picnic area, golf course/driving range/miniature golf, racquet center, San Pascual Stables, skate park, batting cages, Arroyo Woodland and Wildlife Park
Garfield Park 1750 Mission Street	7.0	Playground equipment, 2 tennis courts (lighted), picnic areas, walking path, open lawn, fire ring, Youth House, Healing Garden
Eddie Park 2017 Edgewood Drive	1.5	Open lawn, playground equipment/swings, historic Eddie House, group barbecue area
Library Park 1102 Oxley Street	2.0	Benches, open lawn, walkways surrounding library building
Orange Grove Park 815 Mission Street	2.5	Softball and soccer fields (lighted), 2 tennis courts (lighted), recreation room, and daycare
Legion Park	2.0	Memorial garden War Memorial building with multi-purpose room for up to 200 people
South Paws-adena Dog Park 650 Stoney Avenue	0.75	Opened in November 2016; off-leash dog park, with separate small and special needs dog, and large dog areas
Arroyo Seco-South Pasadena Woodland and Wildlife Park 100 Pasadena Avenue	3.0	Trails and seating areas among native California flora and fauna
Total Acres	**92.7**	
Source: South Pasadena 1998		

Regional Recreational Facilities

The Angeles National Forest is located at the San Gabriel Mountains approximately five miles north of the City. This National Forest has a natural environment, offering scenic views, with developed campgrounds, picnic areas, and opportunities for swimming, fishing, and skiing. Walking and hiking trails wind throughout the forest for use by hikers, equestrians, mountain bikers, and off-highway vehicle enthusiasts.

There are a variety of recreation opportunities within the Arroyo Seco where it extends several miles northward from the City of South Pasadena. The Lower Arroyo Seco is the area south of the Colorado Street Bridge; the Central Arroyo Seco is the area between the bridge and Devil's Gate Dam; and the Upper Arroyo, or Hahamongna Watershed Park, is a large park that extends from the dam into the Angeles National Forest. The Lower Arroyo Seco includes features such as a casting pond, archery range, bird sanctuary, memorial grove, and the historic La Casita del Arroyo; the Central Arroyo Seco includes features such as the 3.3-mile paved recreation loop around the Rose Bowl, Rose Bowl Stadium, Rose Bowl Aquatic Center, Kidspace Children's Museum, Brookside Park, and Brookside Golf Course; and the Hahamongna Watershed Park includes features such as Oak Grove multipurpose field, Flint Wash Bridge, Oak Grove Disc Golf Course, spreading basins and Devil's Gate Dam (a County of Los Angeles Department of Public Works facility). There are hiking, biking, and/or equestrian trails throughout the Arroyo Seco, including trails that connect the City of South Pasadena north to the Hahamongna Watershed Park (Pasadena 2010).

The Ernest E. Debs Regional Park, located at 4235 Monterey Road in the Montecito Heights neighborhood of central-northeast Los Angeles less than one mile from South Pasadena at the nearest point, is a large open space nature reserve and park operated and maintained by the City of Los Angeles Department of Recreation and Parks (Los Angeles 2018).

Griffith Park, also operated by the City of Los Angeles, is located at 2800 East Observatory Road approximately 5.5 miles west-northwest of South Pasadena. Griffith Park is one of the largest municipal park in North America and is the largest historic landmark in the City of Los Angeles, now covering 4,511 acres. In addition to providing over 70 miles of hiking and equestrian trails, Griffith Park houses the Griffith Observatory, Autry Museum of the American West, Greek Theatre, Los Angeles Zoo, Travel Town Transportation Museum, Los Angeles Live Steamers Railroad Museum, Shane's Inspiration universally-accessible playground, a ranger station, two 180 hole golf courses, three tennis complexes, and "The Plunge" swimming pool (Los Angeles 2016).

There are other public recreation spaces of various sizes and amenities within approximately 10 miles of the City, maintained by the County or other city municipalities. The above-described facilities are the largest and/or nearest major regional facilities that City of South Pasadena residents can access with ease.

3.13.3 RELEVANT PROGRAMS AND REGULATIONS

State

California Fire Plan

In a collaborative effort between the State Board of Forestry and the California Department of Forestry and Fire Protection (CDF), the *2018 Strategic Fire Plan for California* (Fire Plan) was prepared to address the protection of lives and property from California wildfires while recognizing that wildfires are a natural phenomenon and can have beneficial effects, particularly on ecosystem health. The Fire Plan is a comprehensive update to the 2010 Strategic Fire Plan for *California*. The overarching vision of the Fire Plan is to have "A vision for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of and responsive to the benefits and threats of wildland fire; all achieved through local, state, federal, tribal, and private partnerships". This vision is supported by eight goals and related objectives, and the application of adaptive management as a fundamental strategy of Fire Plan implementation to provide flexibility and allow for changing internal and external conditions (CAL FIRE 2018).

California Disaster and Civil Defense Master Mutual Aid Agreement

The California Disaster and Civil Defense Master Mutual Aid Agreement is an agreement between the State of California, its various departments and agencies, and the various political subdivisions, municipal corporations, and other public agencies of the State of California. The agreement allows for the use of all the resources and facilities of the participating agencies in preventing and combating the effect of disasters, such as flood, fire, earthquake, pestilence, war, sabotage, and riot. It commits the participating agencies to voluntarily aid and assist each other in the event of a disaster, through the interchange of services and facilities, including fire, police, medical and health, communication, and transportation services and facilities, as necessary to provide rescue, relief, evacuation, rehabilitation, and reconstruction.

Assembly Bill 2926

The State has traditionally been responsible for funding local public schools. To assist in providing facilities to serve students generated by new development projects, the State passed Assembly Bill (AB) 2926 in 1986. This bill allows school districts to collect impact fees from developers of new residential and commercial/industrial building space to fund school construction and reconstruction. AB 2926 also established maximum fees (adjusted for inflation) which can be collected under this and any other school fee authorization.

Senate Bill 50

Senate Bill (SB) 50 (or "Leroy Greene School Facilities Act") and Proposition 1A (both of which passed in 1998) provide a comprehensive school facility financing and reform program by, among other methods, authorizing both a $9.2 billion school facilities bond issue and school construction cost containment provisions. Specifically, the bond funds are to provide for new construction and for reconstruction/modernization needs. The provisions of SB 50 (1) prohibit local agencies from denying either legislative or adjudicative land use approvals on the basis that school facilities are inadequate and (2) reinstate the school facility fee cap for legislative actions (e.g., general plan amendments, specific plan adoption, zoning plan amendments). According to Section 65996 of the *California Government Code*, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation".

SB 50 establishes three levels of developer fees that may be imposed upon new development by a school district's governing board. Beginning in 2000, the maximum allowable amount of Level 1 developer fees is adjusted every two years based on the change in the statewide cost index for class B construction per Section 65995(b)(3) of the Government Code (OPSC 2023). These fee levels depend upon certain conditions within a district. For year 2022, these three levels currently include the following:

Level 1: Level 1 fees are the base statutory fees. Level 1 fees are $4.79 per square foot (sf) for new residential development and $0.78 per sf of chargeable, covered, and enclosed floor space for new commercial/industrial development. These amounts represent the maximum that can currently be legally imposed upon new development projects by a school district unless the district qualifies for a higher level of funding. Payment of this fee is deemed to constitute full, complete, and adequate mitigation of a project's impacts on school facilities (OPSC 2023).

Level 2: Level 2 fees allow a school district to impose developer fees above the statutory levels up to 50 percent of school construction costs under designated circumstances. The State provides grant amounts for new school construction if funds are available.

Level 3: Level 3 fees apply if the State runs out of bond funds, allowing a school district to impose 100 percent of the cost of the school facility or mitigation on the developer minus any local dedicated school monies. However, Senate Bill 1016 (Chapter 38, Statutes of 2012) suspended the ability of school districts to levy Level III fees.

To accommodate students from new development projects, school districts may alternatively finance new schools through special school construction funding resolutions and/or agreements between developers, the affected school districts and, occasionally, other local governmental agencies. These special resolutions and agreements often allow school districts to realize school

mitigation funds in excess of the developer fees allowed under SB 50. As discussed further below, SPUSD adopted Level 1 Developer Fees that were effective December 12, 2022.

Quimby Act

California allows a City or County to pass an ordinance that requires, as a condition of approval of a subdivision, either the dedication of land, the payment of a fee in lieu of dedication, or a combination of both for park or recreational purposes (*California Government Code,* Section 66477). This legislation, commonly called the "Quimby Act," establishes a standard of 3 acres of parkland per 1,000 residents for new subdivision development unless the municipality has already established a higher rate. This is the case with the City of South Pasadena, which has set a standard of 4 acres per 1,000 population.

In February 2008, the City established a Park Impact Fee of $5.89 per sf with an exemption for the first 250 square feet for renovations/remodels. In June 2016, the City Council increased the fee to $7.65 per sf of new or remodeled residential, with fees for senior housing projects at $2.95 per sf, and exemptions for the first 250 sf of the project that increases the habitable living space. These capital fees remain in place as of the City's Master Fee Schedule effective July 1, 2023 (South Pasadena 2023).

Assembly Bill 602

AB 602 imposes additional standards and procedures for agencies adopting impact fees. It requires agencies to identify an existing level of services for public facilities and information supporting the agency's actions in increasing fees and requires agencies to impose fees on a housing development proportionately to the square footage of the development or make findings for a different methodology. Agencies must adopt studies at a public hearing with at least 30 days' notice, notify any member of the public who requests notice of an impact fee nexus study, and consider any evidence submitted by any member of the public that the agency's determinations or findings are insufficient. Large jurisdictions are required to adopt a capital improvement plan as part of the nexus study. Agencies must update nexus fee studies at least every eight years from the period beginning on January 1, 2022. Agencies must also post the current impact fee schedule and update at least twice a year. Finally, the law directs the California Department of Housing and Community Development (HCD) to create an impact fee nexus study template. The modification or establishment of development impact fees in the City, that would apply to new development or redevelopment pursuant to the Project, would be developed in compliance with AB 602.

City

Municipal Code

Chapter 16A, Growth Requirement Capital Fee

Pursuant to Chapter 16A of the South Pasadena Municipal Code (SPMC), the City assesses a growth requirement capital fee (capital fee) upon new residential and commercial development within City boundaries to support the associated need for additional public facilities and services. The fees collected from residential development are used for all capital improvements, which include government, police, and fire facilities; essential infrastructure and related facilities; and cultural and recreational facilities. Residential developments also pay a park facilities impact fee in addition to the capital fee, which contributes to the City's funding for park facilities. The capital

fees collected from commercial and industrial development are only used for capital improvements but not park facilities.

The capital fee is based on a formula designed to ensure that individual developers pay their fair share for public facilities needed to serve the city's growing population. The rates upon which the fees are based shall be adjusted as of July 1st of each year to reflect changes in building costs as determined by the Construction Cost Index for Los Angeles. The public improvements are identified by category in the city's capital improvement program, which is updated annually. Effective July 1, 2023, the capital fees are $1.64 per sf for residential and $1.07 per sf for commercial (South Pasadena 2023).

South Pasadena Unified School District and SB 50

Per SB 50, SPUSD requires developers to pay fees for new residential, commercial, and industrial development; residential construction which increases assessable space by greater than 500 sf; and location, installation, or occupancy of manufactured and mobile homes. The current fees, which went into effect on December 12, 2022, are as follows: No fee for Additions to Existing Residences under 500 sf; $4.79 per sf for Additions to Existing Residences over 500 sf or New Residential; and $0.78 per sf for Commercial/Industrial (SPUSD 2023).

3.13.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse public services impact if it would:

Threshold 3.13a: 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.

b) Police protection.

c) Schools.

d) Parks.

e) Other public facilities.

Threshold 3.13b: 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; and/or

Threshold 3.13c: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.13.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P6.2 Roadway designs should prioritize safety and promote safe complete street networks that facilitate safe and comfortable walking and biking.

A6.2e Engage the Police Department to partner with community groups to reduce the frequency of crime and traffic safety problems.

P6.4 Facilitate contact with nature through network of public and private green space

A6.4a Prioritize new parks in areas underserved by parks and open space.

A6.4b Remove barriers and enhance access to existing parks.

A6.4c Amend development regulations to require new development to provide a range of public and private open spaces.

P7.1 Provide a high level of police service in the community.

A7.1 Maintain an average police response time of less than 3 minutes for emergency calls for service.

P7.2 Promote crime prevention strategies.

A7.2a Continue to support crime prevention and neighborhood watch programs throughout the City.

A7.2b Emphasize and prioritize crime prevention strategies such as pedestrian-scale lighting in targeted areas.

A7.2c Reduce opportunities for criminal activity through physical design standards, recreation opportunities, educational programs, and counseling services.

A7.2d Incorporate natural surveillance principles and best practices into development codes and review processes.

P7.8 Provide a high level of fire protection service in the community.

P7.8a Maintain an average fire department response time of 5 minutes or less to emergency calls for service.

A7.8b Continue to secure adequate equipment and attract and retain personnel while collaborating with neighboring jurisdictions and partner agencies to adequately respond to emergencies and incidents in all parts of the City.

P7.9 Maintain a current Emergency Operations Plan.

A7.9 Regularly review and update the City's General Plan Safety Element as required by State law; regularly update hazard plans to maximize resilience efforts.

P7.4 Minimize risk to life and property from brushfires.

A7.4a Require fire-resistant building materials for all structures in hillside areas and encourage use of fire-resistant landscaping.

A7.4b Require house sprinklers, where determined necessary by the Fire Department.

A7.4c Require adequate fire flow and emergency access as a condition of approval for entitlements within Hillside areas.

P7.6 Maintain multi-jurisdictional programs to protect residents from the risks of fires, foods, seismic events, other natural hazards, and crime.

A7.6a Develop a rapid response team to respond to areas that regular emergency vehicles cannot access.

A7.6b Periodically review and update the post-disaster recovery plan.

A7.6c Provide timely disaster updates and emergency notifications to community members, in multiple languages and formats as appropriate.

A7.6d Install signs in hillside neighborhoods directing residents to the closest evacuation route or shelter, with the ability to provide real-time information.

A7.6e Work with transit agencies and community-based organizations to create an evacuation plan for residents without access to personal vehicles.

A7.6f Upon the next revision of the Local Hazard Mitigation Plan, identify evacuation routes and their capacity, safety, and viability, and evacuation locations, under a range of emergency scenarios.

P5.20 Support safe emergency evacuation for all hillside residents.

A5.20a Develop a rapid response team to respond to areas that regular emergency response vehicles cannot access. This team will need specialized vehicles equipped to maneuver these parts of the City, while also containing the basic necessary equipment to provide emergency response.

A5.20b Periodically review and update the post-disaster recovery plan.

P8.1 Expand parkland inventory to strive for the standard of 5 acres/1000 residents.

A8.1a Procure a linear park easement from Edison.

A8.1b Consider the feasibility of consolidating individual islands at the intersection of Huntington Drive and Fair Oaks Avenue into a park without impacting the orderly flow of traffic.

A8.1c Collaborate with the school district to facilitate access and community use of school grounds (joint use agreements).

A8.1d Consider the feasibility of capping SR-110 with a linear park system.

A8.1e Amend development code to require new development to provide its fair share of public and private open spaces.

P8.2 Ensure the maximum distance between residents' homes and the nearest public park or preserve is ½ mile; ¼ mile is preferred.

A8.2 Expand the overall parks and recreation system through repurposing public land such as excess street space, partnering with organizations like SPUSD, churches, YMCA, and similar institutional uses for access and joint use of open space and facilities, and use other creative means to help address recreational service gaps.

P8.4 Identify opportunities to provide small parks or provisional open space uses.

A8.4a Acquire individual lots in areas of the City that are underserved with park land to develop mini parks for the residents' use.

A8.4b Examine underutilized residual spaces for potential use as passive or active open space areas.

P8.5 Develop and support a citywide parklet program.

A8.5a Develop appropriate design guidelines for parklets and streamline the permitting process and maintenance requirements.

A8.5b Support implementation of parklet demonstration projects and maintenance requirements.

A8.5c Identify locations for parklets citywide along streets with foot traffic, where automobile traffic is low-speed, and where there are surrounding establishments that can provide a level of surveillance.

P8.6 Identify and remove barriers to access parks. Encourage walking and biking as preferred way to get to and from parks.

A8.6a Increase visibility and access to Orange Grove Park by removing fence barrier.

A8.6b Improve sidewalk conditions leading to parks. Install a new sidewalk on Stoney Drive, the main access that leads down to the lower Arroyo.

A8.6c Provide bike lanes, and biking facilities, such as racks and lockers.

P8.7 Create and promote opportunities for youth and adults to participate/volunteer in the expansion/maintenance/operations of parks, recreation, open space events, projects, and programs.

A8.7a Use the City App for smart phones to promote special events and allow public to report any graffiti, or street, sidewalk, light, tree problem, or issues at parks.

A8.7b Create a map of park locations that identifies safe walking paths and distance information.

P8.8 Provide creative expressions in parks and recreations facilities and programs.

A8.8a Allow art installations in parks in compliance with the City's Public Art Program (SPMC 36.390).

A8.8b Collaborate with South Pasadena Art Council (SPARC) to create programs for all ages to promote creative expressions.

A8.8c Continue to work with teens to develop programs and activities, as well as positive and safe places to socialize with friends. Support and expand teen concerts.

P8.9 Strive for financial resiliency to provide, maintain, and operate parks and recreational programs as an integral part of the City's services.

A8.9a Develop a Community Center to provide a location to offer more classes, programs, rental space, and banquets, to increase revenues.

A8.9b Identify operational and maintenance costs for the Community Center facility to adequately plan for future budget considerations.

A8.9c Reevaluate user fees for services to ensure they cover staffing, maintenance, and upkeep.

A8.9d Assure that the City's Park Impact Fee Ordinance is kept current and reflects the appropriate impact fee for residential development.

A8.9e Consider expanding volunteer opportunities such as Adopt-a-Park, Teen Internships, Neighborhood Cleanups, Habitat Restoration, Youth Sports Coaches and Officials, etc. to enhance volunteer efforts in the City.

A8.9f Explore the feasibility of a Development Impact Fee for library services.

A8.9g Conduct a library space needs assessment and explore opportunities for library expansion to meet community demand for meeting rooms, study space, cultural events, and technology resources.

A8.9h Identify operational and maintenance costs related to library expansion to adequately plan for future budget considerations.

P8.10 Explore creative or alternative funding opportunities for programs and capital projects.

A8.10 Explore establishing a Community Foundation or "Friends of South Pasadena Parks" organization for the purpose of soliciting park land donations; applying for private grants the City cannot apply for on its own; and for fundraising to acquire park land and open space.

A8.10b Explore naming rights, sponsorships and asset management opportunities to create ongoing revenue to repay bonds used to build new recreation facilities or for maintenance and operations of existing facilities.

P8.11 Develop links between existing open spaces and the regional open space system.

A8.11 Community Services and Public Works should explore potential regional partnerships to link existing open spaces into a larger regional network of open spaces.

Downtown Specific Plan Update

P2.9 Explore un-tapped opportunities for value capture and revenue generation.

A2.9a Use developer agreements to support the City's public realm improvement goals.

A2.9b Fortify the City's existing Development Impact Fee regime.

P6.2 Lead with roadway design that prioritizes safety. Promote safe networks of complete streets that facilitate safe and comfortable walking and biking.

A6.2b Partner with law enforcement and community groups to reduce the frequency of crime and traffic safety problems.

A6.2c Augment pedestrian activity and social interaction along Mission Street; provide more sidewalk space, and provide a series of parklets distributed throughout the street.

P6.8 Expand the opportunities in the Downtown area to interact with nature within the streets, open spaces, and buildings.

A6.8a Incorporate street trees, street side planters, parklets into street and alley design.

A8.6b Develop a network of public and private green space.

P6.11 Support efforts to expand access to affordable and nutritious food for all people in South Pasadena.

A6.11b Incorporate trees, planters, and parklets into street and alley design.

A6.11c Identify and inventory potential community garden sites in existing parks, public easements and right-of-ways, and schoolyards, and prioritize site use as communities gardens in appropriate locations.

P7.3 Reduce opportunities for criminal activity through physical design standards, recreation opportunities, educational programs, and counseling services.

A7.3 For new infill development and major rehabilitation, incorporate natural surveillance principles and best practices into development codes and review processes.

P8.1 Encourage the dynamic and flexible use of existing open spaces and promote a variety of new recreation and open space uses, where appropriate.

A8.1a Explore ways to use the public rights of way as active open space, such as parklets and exercise amenities or for special events. Redesign the open space around the Metro A Line Station to create a large, cohesive, and central civic amenity, improve pedestrian and vehicular flow, and improve the paved surface aesthetics.

A8.1b Redesign Orange Grove Park with enhanced sight lines and an active, accessible, and visually engaging perimeter design. Explore possible use of Orange Grove for other uses in addition to AYSO & Little League.

A8.1c Continue to partner with the owner of the South Pasadena School District site for the use of their central court to host a variety of public events and festivals.

A8.1d Amend the standards to require and/or encourage private development to provide a range of public and private open spaces on the block, lot, and building.

A8.1e Develop long-term funding mechanisms for maintenance, operation, renovation and acquisition of open space and recreation.

P8.2 Provide and promote a balanced recreation system that offers a variety of high quality recreational opportunities for all residents.

A8.2a Provide a range of recreational activities and programs that are responsive to community needs and changing demographics.

A8.2b Support the expansion of the library and identify a sustainable way to fund expanded operations and maintenance.

2021–2029 Housing Element Implementation Programs

There are no Housing Element Implementation Programs goals or policies related to public services and recreation.

3.13.6 ENVIRONMENTAL IMPACTS

Threshold 3.13a: Would 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?

b) Police protection?

c) Schools?

e) Other public facilities?

Fire Protection and Emergency Medical Services

Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would increase the number of residents, employees, businesses, and structures in the City, including patrons and visitors, thereby increasing the demand for fire protection services. Potential development is anticipated to create the typical range of fire service calls that other similar uses existing in the City generate. Assuming buildout of the General Plan Update in the year 2040, the City is anticipated to increase by up to 2,775 dwelling units (DUs) and 430,000 sf of retail/office land uses, which would generate an estimated 6,882 residents and 1,978 jobs. It is noted the proposed increase in non-residential uses is focused on office and retail development, and no industrial/manufacturing land uses that would more likely handle hazardous materials and/or have increased fire risk are envisioned. The SPFD has indicated the existing facilities and staffing could support the buildout of land uses, and associated increase in resident and daytime population, under the proposed Project.

Individual development projects would be reviewed by the SPFD as part of the City's project review process and would be required to comply with all fire code standards in effect at the time the building permit is issued, pursuant to Section 14.4 et. seq. of the SPMC, which includes requirements for building construction, fire flows and pressures, hydrant placement, and other requirements that would reduce the creation of fire hazards and facilitate emergency response. Additionally, the area located south of Monterey Road and west of Meridian Avenue is defined as a "High risk fire area" pursuant to Section 14.1 of the SPMC. In addition to City fire code standards, development of any parcels in this area would be required to have Class A roof assemblies, which are effective against severe fire test exposures.

The SPFD has determined the construction of new or expanded facilities would not be required to serve the projected growth in the City; therefore, there would be no physical impacts associated with the construction of new facilities as a result of the General Plan Update. Additionally, future funding for maintenance of SPFD resources and services (i.e., fire inspectors or fire companies) would be provided through the City's capital fee program collected on new development (Chapter 16A of the SPMC) as well as through the collection of taxes from existing taxes. If it is determined at a later date that additional fire protection facilities are required, such a development would be subject to project-specific environmental review pursuant to the California Environmental Quality Act (CEQA). Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the General Plan and DTSP Update, as discussed

in Sections 3.1 through 3.16 of this Program Environmental Impact Report (PEIR), and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation.

The proposed General Plan Update includes policies and actions to provide a high level of fire protection services in the community, including continuing to secure adequate equipment and personnel while partnering with partner agencies. The General Plan Update calls for maintaining a current Emergency Operations plan, with a review and update every five years. For areas at risk of brush fires, policies and actions direct the use of fire-resistant building materials and ensuring adequate fire flows and emergency access as a condition of approval. These actions are consistent with the SPMC fire code standards.

Therefore, with implementation of the policies and actions identified above and the requirements of the SPMC, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts to fire protection services and would note cause a need for new or physically altered facilities. Thus, no mitigation is required.

Police Protection Services

Future development pursuant to the General Plan Update & 2021–2029 Housing Element Implementation Programs would increase the number of residents, employees, businesses, and structures in the City, including patrons and visitors, thereby increasing the demand for police protection services. Increase in vehicle trips on City roadways could also increase the potential for traffic accidents and violations. These factors would lead to increases in the demand for police protection and law enforcement services from the SPPD.

The SPPD has indicated that while the existing facilities could support the buildout of land uses under the Project, it is recommended that two additional sworn police officers are added to the existing staff. This increase in staff would also entail an additional administrative cost to support the increase in calls for service, public requests, special events, community activities, and ancillary support. The small increase in sworn and non-sworn support staff to provide police protection services to future land uses and populations is solely a cost-based issue. The funding for new officer positions and resources needed to maintain acceptable Citywide police protection service levels comes from the growth requirement capital fee assessed on all new residential and commercial development (Chapter 16A of the SPMC) and the City's General Fund. Property taxes and other fees assessed on property owners within the City contribute to the General Fund revenues.

However, the SPPD has determined that construction of new or expanded facilities is not required to support implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. If it is determined at a later date that additional police protection facilities are required, they would be subject to project-specific environmental review pursuant to CEQA. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, as discussed in Sections 3.1 through 3.16 of this EIR, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

The proposed General Plan Update includes policies and actions to provide a high level of police protection services in the community, including maintaining an average emergency response time of less than three minutes; reducing opportunities for criminal activity through physical design

standards, recreation opportunities, educational programs, and counseling services; incorporating natural surveillance principles and best practices into development codes and review processes; and emphasizing and prioritizing crime prevention strategies such as pedestrian-scale lighting in targeted areas. The General Plan Update calls for maintaining a current Emergency Operations Plan, with a review and update every five years.

Therefore, with implementation of the policies and actions identified above and the requirements of the SPMC, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts to police protection services, and no mitigation is required.

School Services

Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would increase the number of homes in the City through 2040, thereby increasing the demand for school services. For purposes of this analysis, all student generation in the City is assumed to be served by the SPUSD. Table 3.13-4, Student Generation Estimate, provides the estimate of students that would be generated by future development in the City. The 2021–2029 Housing Element Implementation Programs has identified capacity for 246 single-family DUs and 297 Accessory Dwelling Units (ADUs), which are also assumed to be single-family as a conservative approach to this analysis. All other sites would be considered multi-family for the calculation of student generation. It is noted that not all households generate children, some households are occupied with children beyond school age; and ADUs are often used to house grandparents or aging parents, or young adults that have not started a family. Nonetheless, all DUs identified in the Housing Element Implementation Programs are assumed to generate school-age children, thereby providing a very conservative analysis.

TABLE 3.13-4
STUDENT GENERATION ESTIMATE

Grade	Enrollment for Single-Family (student/DU)	Estimated Generation for Single-Family (543 DUs)	Enrollment for Multi-Family (student/DU)	Estimated Generation for Multi-Family (2,232 DUs)	Total Estimated Enrollment at Buildout	Total Estimated Enrollment Per Year
K–6	0.455	247	0.189	422	669	39
7–8	0.127	69	0.075	167	236	14
9–12	0.164	89	0.094	210	299	18
Totals	**0.746**	**405**	**0.358**	**799**	**1,204**	**71**

du: dwelling unit
Note: Some totals may not add due to rounding.
Source of generation factors: SPUSD 2016.

Based on the assumptions described above, approximately 1,204 school-age children requiring school services would be generated by new housing development in the City through 2040, or approximately 71 students per year distributed across the 12 grade levels. The estimated annual enrollment is based on 17 years from preparation of this PEIR (2023) through 2040. Future non-residential development is not expected to lead directly to a demand for school services. While employees at the future non-residential uses may request intra-district transfers based on employment location, this is only allowed based on the availability of space.

Long term enrollment projections are predicated primarily on birth rates, property and rental values, family migration patterns and unknown changes in the California Education Code by the Governor and State Legislature. Therefore, current facilities for elementary, middle, and high school students may need to be expanded. Specifically, the SPUSD envisions the need for expansion of permanent (non-modular) facilities on existing campuses and/or reopening the Oneonta School, located at 1955 Fremont Avenue, as an SPUSD elementary school and/or reconfiguring the grade level composition at its elementary and middle schools. The Oneonta School property is owned by the SPUSD, and the facility is leased by the Institute for the Redesign of Learning Almansor Academy, a special education non-public day school. The latter option would require extensive remodeling and modernization to accommodate the planned use.

When and if it is determined that expanded and/or renovated school facilities are required, they would be subject to project-specific environmental review pursuant to CEQA and would also be required to comply with State standards for school siting. This would include consideration of any indirect effects to the Almansor Academy and its relocation. However, at this time, there is not enough data to determine the precise scenario for expanding permanent elementary school services that would ultimately be determined preferable by the SPUSD. As such, the environmental effects of such expansion are not reasonably captured in this PEIR. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the General Plan and DTSP Update & 2021–2019 Housing Element Implementation Programs, as discussed in Sections 3.1 through 3.16 of this EIR, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

As allowed under the SB 50, school districts serving the City can assess school impact fees based on the floor area of new dwelling units and non-residential developments. These fees are used to fund school services and facilities needed to provide the necessary school services. Future development would need to pay school impact fees prior to issuance of building permits. These fees are subject to changes on an annual basis, as deemed appropriate by the SPUSD, and will be determined at the time individual projects are processed/reviewed. As noted above, SPUSD's current fees are as follows: $4.79 per sf for Residential and $0.78 per sf for Commercial (SPUSD 2023). As part of this fee program, information on individual development projects would have to be submitted to the school districts that would serve each development to determine applicable school impact fees and to allow the school districts to analyze potential demand for school services and the facility needs of the development. In addition to SB 50 fees, State and local bond measures have been passed, and may be passed in the future, to fund additional school facilities.

As provided under *California Education Code* Section 17620 and *California Government Code* Section 65970, the payment of statutory school fees is presumed to fully mitigate a project's impacts on schools. *California Government Code* Section 65995(h) states that payment of fees is "full and complete mitigation of the impacts". The *California Education Code* and *California Government Code* do not require the dedication of land or payment of fees in excess of statutorily established school fees. Thus, impacts on school services from future residential development would be less than significant with payment of required SB 50 fees, and no mitigation is required.

Library Services

For purposes of this PEIR, other public services refer to library services. Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would increase the number of residents in the City, thereby increasing the demand for library services. The American Library Association and the Public Library Association do not publish service ratio standards for public libraries since needs vary across diverse communities;

however, there are a variety of professional resources available (e.g., The National Institute of Building Sciences[3]) that provide a standard framework for calculating public library facility and equipment needs based on population. These guidelines address collection space, user seating space, staff workspace, meeting space, and special use space.

Based on current cardholder data, the SPPL assumes that approximately 55 percent of future residents would carry and use a library card, or approximately 17,854 total residents (55 percent of the projected 2040 population of 32,462). SPPL residents make up approximately 53 percent of the total number of active cardholders. While the popularity of the library's e-books and e-audiobooks that are available remotely continues to increase, lending of physical materials remains robust and the demand for in-person services at the library is undiminished. The SPPL states that the library is the most visited public building in the City, and it is expected that the demand for in-library services, including computers, Wi-Fi, space to work and study, librarian assistance, and programs and special events, would increase as the population increases. The existing library facility and equipment is not always adequate to meet current demand.

The SPPL was last expanded and renovated in 1982 and as early as 2020 the Library Board of Trustees recognized that the library needed to be upgraded and expanded to meet the community's needs for a 21st century library. The City and the SPPL have considered expanding library services into the existing Senior Center if and when a new Community Center is constructed. However, a new Community Center remains in the planning stages, and the location and timing of this facility is unknown as of preparation of this PEIR. The General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs include actions that support creation of a Community Center, and a sustainable way to fund its operation and maintenance. This is the most likely pathway to expanded library space. The General Plan also includes actions to explore a Development Impact Fee for library services, conduct a library space needs assessment, and identify operational and maintenance costs related to library expansion to adequately plan for future budget considerations.

The SPPL would continue to evaluate library space with regard to adequacy of levels of service as the City grows in the future. The City's growth requirement capital fee assessed on all new residential and commercial development (Chapter 16A of the SPMC) is intended in part to support library services. When and if it is determined that additional library facilities are required, they would be subject to project-specific environmental review pursuant to CEQA. Like the discussion of schools above, a likely path to provide expanded library services has already been identified and would also involve reuse of an existing space; however, at this time, there is not enough data to determine the precise scenario for expanding library services that would ultimately be implemented by the City. As such, the environmental effects of such expansion are not reasonably captured in this PEIR and would be analyzed as a separate project in the future, if implemented. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, as discussed in Sections 3.1 through 3.16 of this EIR, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, with implementation of the policies and actions identified above and the requirements of the SPMC, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts to library services, and no mitigation is required.

[3] https://www.wbdg.org/building-types/libraries/public-library

Threshold 3.13a: Would 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:

d) Parks?

Future development pursuant to the Project would increase the number of residents in the City, thereby increasing the demand for recreational services. Non-residential development is not likely to create a direct demand for parks and recreational facilities. As discussed above, the City has approximately 118 acres of parks, equating to approximately 4.6 acres of parkland per 1,000 residents. The City's parks standard of 5 acres of parkland per 1,000 residents is slightly higher than the State standard at 4 acres of parkland per 1,000 residents. However, the General Plan Update includes a policy to expand parkland inventory to strive for a standard of 5 acres per 1,000 residents.

To meet this standard for the existing population (25,580 persons), an estimated 9.9 acres of additional, or 128.0 acres total, of parks, recreation facilities, and open space areas would be needed. To meet this standard for future growth, the estimated 6,882 residents generated with buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs (assuming no residential vacancies) would require approximately 34.4 acres of parks and other recreation facilities. When considering both existing and future growth, an estimated 44.3 acres of additional, or approximately 162.3 acres total, of parks and other recreation acres would be needed.

In Spring 2017, the City acquired the deeds to two parcels previously owned by Caltrans, located at 2006 Berkshire Avenue and 1107 Grevelia Street, for the development of pocket parks. The City Council has approved the hiring of a landscape architecture firm to compile the results of the ongoing public outreach effort and complete a conceptual design for each park, for use in seeking grant funding for the construction of each site. On May 10, 2021, the City reinitiated this effort with a community meeting. On June 14, 2021, the Parks and Recreation Commission provided a recommendation to City Council to move forward with the concept designs and construction documents for the two pocket parks. In August 2021, City Council approved the concept designs and associated budgets for construction of the pocket parks. As of July 2023, the City is preparing to go out to bid for construction of both parks.

The General Plan and DTSP Update includes numerous policies and actions focusing on development of additional parks, operation and maintenance of existing and future parks, and facilitating improved access to and use of parks. Purchasing vacant Caltrans properties for development as recreation features are along these actions. Other methods to expanding the parks and recreation system include, but are not limited to: repurposing public land like excess street space, partnering with other organizations like SPUSD, churches, YMCA, and similar institutional uses for access and joint use of open space and facilities; acquiring individual lots and areas in portions of the City that are underserved with park land to develop mini parks for the residents' use; consolidating the individual islands at the intersection of Huntington Drive and Fair Oaks Avenue into a park; procuring a linear park easement from Southern California Edison; and amending the City's development code to require new projects to provide their fair share of public and private open spaces.

The City would strive to meet and maintain acceptable parkland standards, defined in the General Plan Update as 5 acres per 1,000 residents. The City recognizes that providing adequate, or abundant, parks and other open spaces has substantial benefits both to its residents and to the environment. The General Plan Update, as a policy document, has outlined the priorities and methods for ensuring that park facilities are provided and improvements necessary to meet the long-range demand are implemented. Therefore, from a policy level, there would be no impact. Site-specific improvement plans would be evaluated pursuant to CEQA at the time the development is proposed. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, as discussed in Sections 3.1 through 3.16 of this EIR, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, with implementation of the policies and actions identified above, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts to parks services, and no mitigation is required.

Threshold 3.13b: 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?

The additional residents in the City pursuant to the Project would be likely to use both existing and future parks and recreational facilities in the City, as well as facilities in the surrounding area. These include City parks, County parks and recreational facilities, private recreational facilities, and recreational areas at the Angeles National Forest.

As discussed above, to meet the proposed standard of 5 acres of parks per 1,000 residents for future growth, the estimated 6,882 residents generated with buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would require approximately 44.3 acres of parks and other recreation facilities. The City currently provides approximately 4.6 acres of parks per 1,000 residents, which exceeds the State/Quimby Act standard of 3 acres per 1,000 residents. Under this standard, the City's approximately 118 acres of parks and recreation facilities would meet the State standard even when considering the projected growth under the Project, which would equate to approximately 97.4 acres. Therefore, the need to add parkland to meet the City's standard is solely a function of the high standard for recreation being sought. However, when considering that the State standard would be met (for what is considered adequate parkland in combination with the likely expansion of parks in the City, the addition of an estimated 6,882 residents (assuming no residential vacancies) would not 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.

Therefore, with implementation of the policies and actions identified above, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts to park conditions, and no mitigation is required.

Threshold 3.13c: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

There are no individual parks or recreational facilities that have been identified for construction through adoption of the General Plan and DTSP Update & 2021–2029 Housing Element

Implementation Programs. New parks or park expansions that would be constructed by the City or are part of individual development projects are expected to occur within the developed areas of the City, including infill vacant lots. As discussed above, many of the methods that may be used to create additional parkland involve the strategic and creative use of existing lands in the City, such as the Southern California Edison easement and vacant lots, as the City is largely built out. The development of new parks and recreational facilities would be a beneficial impact in the City by meeting existing and future demands. New parks and recreational facilities would result in environmental impacts as discussed under the various sections of this PEIR, including but not limited to short-term construction-related impacts (e.g., air quality, noise, and water quality) as well as long-term operational impacts (e.g., light/glare, noise, traffic). There are several policies and actions pertaining to recreation facilities that focus on the sustainable long-term operation and maintenance of these facilities, both environmentally and financially. Individual park projects would be subject to separate CEQA review once specific development plans are identified.

Therefore, with implementation of the policies and actions identified above, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in less than significant impacts to park construction, and no mitigation is required.

3.13.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Future growth and development within the San Gabriel Valley would generate increased demand for public services from various service agencies. While increases in demand would occur on other public service agencies that do not serve the City, future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not add to the service demands on those agencies that do not serve the City. Thus, the cumulative analysis for public services considers the service area of the respective providers and adjacent service agencies, as they may be affected by services provided in the City. As identified in this section, the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not result in cumulatively considerable impacts related to public services, and no mitigation is required.

Fire Protection and Emergency Medical Services

For fire protection services, the SPFD provides automatic aid to the cities of Alhambra, Arcadia, Burbank, Glendale, Monrovia, Montebello, Monterey Park, Pasadena, San Gabriel, San Marino, and Sierra Madre and the Bob Hope Airport Fire Department as part of the VFCC. The SPFD also participates in the State of California Master Mutual Aid program, which is used when all available local resources have been depleted or committed to an incident, allowing the State to coordinate resources available from neighboring counties, as necessary. Thus, future development in the City of South Pasadena and the VFCC participating agencies would increase the population and introduce structures that would create a demand for fire protection and emergency services. This cumulative demand for fire protection services would require additional personnel and resources at individual agencies to provide the same level of service and maintain existing response times. Conversely, the purpose of the VFCC is to provide a localized dispatch center with a borderless system among the participating agencies whereby the nearest available responder to the event, regardless of jurisdictional boundary, would provide the needed fire or emergency services.

Essentially, each participating agency has the resources of all other participating agencies available for emergency response.

Individual developments are required to comply with pertinent provisions of the California Fire Code to prevent the creation of fire hazards, to promote fire safety, and to facilitate emergency response. The individual fire agencies, including the SPFD, also regularly review their services and the needed increases in staffing, fire stations, and equipment, as necessary, to keep response times acceptable and to adequately serve their service areas. Plan reviews of proposed development projects by the individual fire departments would accomplish the following: (1) prevent the creation of fire safety hazards by development; (2) require fire prevention measures to be incorporated into individual projects; and (3) facilitate fire emergency response by providing adequate access and fire alarm systems. Compliance with these existing regulations by the participating VFCC agencies would avoid potential significant cumulative impacts on fire protection service levels, and no mitigation is required.

Police Protection Services

For police protection services, the geographic area for consideration of cumulative impacts is the City, as this is the SPPD service area. As discussed, the SPPD participates in FAST Program, which provides a regional law enforcement helicopter air support program. The SPPD also participates in a mutual aid program similar to the fire department. As determined in the analysis above, implementation of the Project would result in less than significant impact related to police protection services. Therefore, there would not be a significant cumulative impact, and no mitigation is required.

School Services

For school services, the geographic area for consideration of cumulative impacts is the City, as this is the SPUSD service area. As determined in the analysis above, implementation of the Project would result in less than significant impact related to school services. Therefore, there would not be a significant cumulative impact, and no mitigation is required.

Library Services

For library services, the geographic area for consideration of cumulative impacts is the City, as this is the SPPL service area. As determined in the analysis above, implementation of the Project would result in less than significant impact related to library services. Therefore, there would not be a significant cumulative impact, and no mitigation is required.

Parks and Recreation Services

Future residential development pursuant to the proposed Project and development projects in areas surrounding the City would contribute to the cumulative need for more parks and recreation within the City. The analysis of cumulative impacts to parks and recreation considers buildout of the City and growth and development in the San Gabriel Valley through year 2040.

Typically, parkland requirements are a function of expected demand and are related to the number of residential dwelling units created by projects. Pursuant to Section 66477 of the *California Government Code* (or Quimby Act), many nearby cities (e.g., Arcadia, Pasadena, Sierra Madre, Temple City, and El Monte and the County of Los Angeles) have adopted Quimby Act ordinances that require the payment of fees or the dedication of parkland to meet the demand for parks and recreational facilities generated by each residential development. Consistent with

these regulations, developers of individual projects would pay park fees, dedicate open space lands for park and recreation development, and/or provide on-site recreational facilities to meet the demand for parks and recreational facilities generated by each development. Thus, residential developments in and around the City of South Pasadena would provide parks and recreational facilities to meet their demands. Based on the small increment of park demand (approximately seven acres) required for the Project and the adoption of Quimby Act requirements by several surrounding cities and the County, no significant cumulative impacts would result related to park demand from regional population growth.

The development of new parks and recreational facilities to meet the demand of future growth and development in the San Gabriel Valley would result in cumulative environmental impacts. Since the Valley is largely built out, these projects are not expected to represent a significant amount of new development and construction in the Valley. These projects would be subject to separate CEQA review once specific development plans are identified. Since new parks developed under the General Plan and DTSP Update would have less than significant impacts, the Project's cumulative contribution to impacts related to parks and recreation is also considered less than significant.

The increase in San Gabriel Valley population through 2040 would result in the increased use of existing neighborhood and regional parks or other recreational facilities. However, the surrounding cities, County of Los Angeles, and National Forest Service have policies and programs to maintain and/or develop recreation facilities to meet increased demand. It is not expected that there would be regional growth, without some parallel growth of recreation facilities, such that the existing facilities would experience substantial physical deterioration. There would be no significant cumulative impacts related to deterioration of existing facilities from regional population growth, and no mitigation is required.

3.13.8 MITIGATION MEASURES

No significant adverse impacts related to public services and recreation have been identified with implementation of relevant policies and actions in the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. Therefore, no mitigation is required.

3.13.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impact at both a program and cumulative basis.

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3.14 TRANSPORTATION

3.14.1 METHODOLOGY

This section evaluates the potential for implementation of the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project) to result in transportation and traffic impacts in the City of South Pasadena (City). This section describes the existing transportation conditions in the City, including the roadway network, bicycle and pedestrian network, transit network, and current intersection and roadway segment operations.

On May 20, 2020, the City adopted California Environmental Quality Act (CEQA) transportation analysis thresholds (Resolution No. 7656) pursuant to Senate Bill (SB) 743. SB 743 was passed in September 2013 and incorporated into updated State CEQA Guidelines adopted by the Natural Resources Agency in December 2018. The updates included changes to the CEQA Environmental Checklist presented in Appendix G of the State CEQA Guidelines, including a finding that auto delay and roadway volume to capacity measures are no longer applicable metrics to evaluate transportation impacts under CEQA. For the purposes of a CEQA-compliant transportation analysis, the City utilizes measures of vehicle miles traveled (VMT) per capita, per employee, and per service population (i.e., residents plus employees). However, the City will continue to maintain the use of local traffic operations analysis (i.e., Level of Service [LOS] analysis) outside of the CEQA process to ensure adequacy of public roadway facilities.

An SB 743-compliant transportation analysis was prepared in 2023 for the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs by Iteris, Inc. (Iteris). The findings of the VMT transportation analysis are presented in this section.

3.14.2 EXISTING CONDITIONS

South Pasadena's transportation system includes roadways, public transportation, and bicycle and pedestrian infrastructure.

Existing Roadway Network

The City classifies its streets into three major categories based on the functional classification system and includes arterials, collectors, and local residential streets.

Arterial streets are generally the commercial arteries. They carry most of the traffic within the City. A major arterial would contain either four or six lanes of through traffic, plus left-turn lanes at key intersections. Minor arterials serve the same function as major arterials but have four lanes of through traffic and may or may not have separate left-turn lanes. Recommended design volumes on arterials are generally greater than 25,000 vehicles per day for major arterials and between 4,000 and 30,000 vehicles per day for minor arterials, depending on number of lanes and left-turn movements. Arterials serve two primary functions: (1) to move vehicles within the City and (2) to serve adjacent commercial land uses. Driveways and other curb cuts along arterials are generally limited to minimizing disruption to traffic flow. Major arterials in the City include Huntington Drive and Fair Oaks Avenue. Minor arterials in the City include Freemont Avenue, Garfield Avenue, Grevilia Street, Monterey Road, Orange Grove Avenue, Mission Street, and Pasadena Avenue.

Collector streets are intended to carry traffic between residential neighborhoods and the arterial street network. They are generally two and four-lane roadways that have a mixture of residential and commercial land uses along them. Traffic volumes on collector streets are generally between 7,000 and 20,000 vehicles per day. Higher density residential land uses, or side yards of single-family homes may be located adjacent to collector streets. Higher traffic volumes may be acceptable on certain collector streets such as those fronting commercial uses.

Local residential streets are designed to serve adjacent residential land uses only. They allow access to residential driveways and often provide parking for the neighborhood. They are not intended to serve through traffic. Traffic volumes on a residential street can carry up to 6,000 vehicles per day. The maximum residential traffic volume that is acceptable to persons living along a street may vary from one street to another, depending upon roadway width, type of dwelling units (i.e., high density apartments versus single-family homes), presence of schools, and other factors.

Truck Routes

Streets declared by the City as truck routes are for the movement of commercial vehicles exceeding a maximum gross weight of 6,000 pounds, laden or unladen, include the following:

- Fair Oaks Avenue between Huntington Drive and the northerly City limits;
- Huntington Drive between the westerly City limits and the easterly City limits;
- Pasadena Avenue between Mission Street and the westerly City limits;
- Mission Street between Pasadena Avenue and Fair Oaks Avenue; and
- Fremont Avenue between Alhambra Drive and the south drive of Huntington Drive.

Baseline Traffic Conditions

The VMT analysis was prepared in conformance with the City of South Pasadena's transportation analysis guidelines. VMT is defined as the total miles traveled by vehicles (within a transportation network). Daily VMT values for the City were generated using the Southern California Association of Governments' (SCAG's) regional travel demand model. SCAG's regional model analyzes modes of travel—local and express bus transit, urban rail, commuter rail, toll roads, carpools, and truck traffic—as well as non-motorized trips based on changes in land use types, household characteristics, transportation infrastructure, and travel costs such as transit fares, parking costs, tolls, and auto operating costs.

The baseline VMT was developed through utilizing the SCAG regional travel demand model's most recent existing conditions socioeconomic data and transportation network at the time of preparation of the transportation analysis (designated as Year 2018 in the SCAG regional travel demand model). Table 3.14-1 presents the VMT analysis results for the baseline scenario. Two metrics for VMT are shown: (1) home-based VMT per population (VMT per Capita) and (2) total VMT per service population (VMT per Service Population), which is population plus employment. As shown in Table 3.14-1, under baseline conditions the City's VMT per Capita is 14.5 miles per day and the VMT per Service Population is 24.5 miles per day.

TABLE 3.14-1
CITY OF SOUTH PASADENA BASELINE DAILY VMT

Scenario	Home-Based VMT	Population	VMT/ Capita	Total VMT	Service Population	VMT/Service Population
Baseline	371.493	25,580	**14.5**	961,265	39,280	**24.5**

Public Transportation System

The Los Angeles County Metropolitan Transportation Authority (Metro) provides transit services in the City of South Pasadena and is the leading transit provider in the County of Los Angeles (County), offering a wide range of rail and fixed-route bus service. The Metro A Line Station near the intersection of Mission Street and Meridian Avenue provides light rail service between East Los Angeles and the City of Azusa via downtown Los Angeles. Metro bus lines serving the City currently include the following:

- Metro Local Line 179 to/from Downtown Los Angeles to Arcadia along Huntington Drive;
- Metro Local Line 258 to/from Highland Park/South Pasadena to Paramount along Fremont Avenue and Eastern Avenue; and
- Metro Local Line 260 to/from the Artesia Blue Line Station along Atlantic Avenue and Fair Oaks Avenue.

Metro also provides curb-to-curb shared-ride services through its Access, or ADA Complementary Paratransit, service for people who have a disability. Access will pick up and drop off disabled riders within ¾-mile of any fixed bus operated by the County and any Metro rail stations during the hours the systems are operational. Access services are consistent with all federal Title V requirements. The City is located in the Eastern Access Service Region.

The City also provides Dial-A-Ride services for City residents who are over 55 years of age and/or residents with disability. Registration is required and all rides are by appointment only. Transportation is provided to and from any location within the City limits. Services is also provided to some surrounding medical offices in the cities of Pasadena, San Marino, Arcadia, and Alhambra.

Bikeway Network

Bicycling is encouraged throughout the City of South Pasadena, and the City continues to make fiscal commitments to substantively expand the existing network of bikeways in the community. The existing bicycle facilities serving the community include the following:

Bicycle Path

- The Arroyo Seco Bike Path from Arroyo Seco Park to the Montecito Recreation Center in the City of Los Angeles.

Class II Bicycle Lanes

- Marengo Avenue from Alhambra Road to Mission Street;
- Mission Street from Brent Avenue to east of Garfield Avenue;
- Raymondale Drive from State Street to Amberwood Drive;
- El Centro Street from Orange Grove Park to Pasadena Avenue;
- Pasadena Avenue from Mission Street to Hawthorne Street;
- Pasadena Avenue from Arroyo Drive to Arroyo Verde Drive; and
- Marmion Way from east of Arroyo Verde Road to west of Arroyo Verde Street.

Class III Bicycle Routes

- Oxley Street from Fremont Avenue to Fair Oaks Avenue.
- El Centro Street from Meridian Avenue to Orange Grove Park.

Pedestrian Network

Metro A Line station access is a major focus of the Project. Several streets lead to the station from the north, south, east, and west (i.e., Meridian Street, Mission Avenue, El Centro Street, Glendon Way). These have been identified as path arterials. There are also several streets that connect to and extend for a considerable distance from these streets and provide important connections. These include, but are not limited to: Grand Avenue, Orange Grove Avenue, Prospect Avenue, Fremont Avenue, Grevelia Street, and Monterey Road. Some of these streets are existing or planned bicycle routes providing important connections beyond the half-mile radius to the larger bikeshed. For example, Mission Street and El Centro Street connect to the Pasadena Avenue bike lanes at their western ends.

The walkshed around the A Line station is a well-connected network of streets with relatively small blocks, enabling direct pedestrian and bicycle paths. However, a few obstacles are noted. These include physical barriers—State Route (SR) 110; the rail line itself; the four lanes on Mission Street; lack of traffic calming on Fremont Avenue; and high-speed intersection turns at El Centro Street and Orange Grove Avenue; widely spaced or missing crosswalks; substandard or missing sidewalks on El Centro Street, Monterey Road, and Mission Street; and gaps between bike lanes on Mission Street.

3.14.3 RELEVANT PROGRAMS AND REGULATIONS

State

California Transportation Commission

The California Transportation Commission (CTC) administers the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. The CTC's programming includes the State Transportation Improvement Program, a multi-year capital improvement program of transportation projects on and off the State highway system, funded with revenues from the State Highway Account and other funding sources. The California Department of Transportation (Caltrans) manages the operation of State highways.

California Department of Transportation

Caltrans is the primary State agency responsible for transportation issues. One of its duties is the construction and maintenance of the State highway system. Caltrans approves the planning, design, and construction of improvements for all State-controlled facilities, including the Arroyo Seco Parkway (SR 110) and the associated interchanges. Caltrans has standards for roadway traffic flow and has developed procedures to determine if State-controlled facilities require improvements.

For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. Caltrans also prepares comprehensive planning documents, including corridor system management plans and transportation concept reports, which are long-range planning documents that establish a planning concept for State facilities.

California Manual of Uniform Traffic Control Devices

The California Manual on Uniform Traffic Control Devices (California MUTCD) is published by the State and is issued to adopt uniform standards and specifications for all official traffic control devices in California, in accordance with Section 21400 of the California Vehicle Code. Effective March 10, 2023, Caltrans has made edits, referred to as Revision 7, to the 2014 California MUTCD.

Senate Bill 743

On September 27, 2013, SB 743 was signed into law. A key element of this law is the elimination of or deemphasizing auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant environmental impacts in many parts of the State. According to the legislative intent of SB 743, these changes to then current practice were necessary to balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.

The California Legislature found that with adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), discussed further below, the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce VMT and thereby contribute to the reduction of GHG emissions, as required by the California Global Warming Solutions Act of 2006, Assembly Bill (AB) 32. Additionally, AB 1358, described further below, requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 started a process that fundamentally changed transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay and similar measures of vehicular capacity or traffic congestion (commonly referred to as LOS analysis) as the basis for determining significant transportation impacts. As part of the updated State CEQA Guidelines, the new criteria were designed to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. The Office of Planning and Research (OPR) developed alternative metrics and thresholds based on VMT. The updated State CEQA Guidelines reflecting SB 743 were certified by the Secretary of the Natural Resources Agency in December 2018. These updates require that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a

significant impact on the environment for CEQA purposes. Individual agencies (cities and counties) had until July 1, 2020, to adopt new VMT-based criteria.

The City developed and adopted new CEQA transportation impact analysis methodology consistent with SB 743 on May 20, 2020 (Resolution No. 7656), to evaluate the transportation impacts of the proposed Project as well as future projects in the City's jurisdiction.

SB 375: Sustainable Communities and Climate Protection Act

On December 11, 2008, the California Air Resources Board (CARB) adopted its proposed Scoping Plan for AB 32, the Global Warming Act. This scoping plan included the approval of SB 375 as the means for achieving regional transportation-related GHG emissions targets. SB 375 provides guidance on how curbing emissions from cars and light trucks can help the State comply with AB 32. There are five major components to SB 375.

First, SB 375 addresses regional GHG emissions targets. CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each metropolitan planning organization (MPO) in the State. These targets, which MPOs may propose themselves, are updated every eight years in conjunction with the revision schedule of housing and transportation elements.

Second, MPOs are required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional GHG emissions targets. The SCS and the Regional Transportation Plan (RTP) must be consistent with each other, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an Alternative Planning Strategy that details an alternative plan to meet the target.

Third, SB 375 requires that regional housing elements and transportation plans be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment (RHNA) allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land because of changes in the housing element, rezoning must take place within three years.

Fourth, SB 375 provides CEQA streamlining incentives for preferred development types. Residential or mixed-use projects qualify if they conform to the SCS. Transit-oriented developments also qualify if they: (1) are at least 50 percent residential, (2) meet density requirements, and (3) are within one-half mile of a transit stop. The degree of CEQA streamlining is based on the degree of compliance with these development preferences.

Fifth, and finally, MPOs must use transportation and air emission modeling techniques consistent with guidelines prepared by the CTC. Regional transportation planning agencies, cities, and counties are encouraged but not required to use travel demand models consistent with the CTC guidelines.

AB 1358: California Complete Streets Act of 2008

The California Complete Streets Act of 2008 was signed into law on September 30, 2008. Beginning January 1, 2011, AB 1358 required circulation elements to address the transportation system from a multimodal perspective. The bill states that streets, roads, and highways must "meet the needs of all users…in a manner suitable to the rural, suburban, or urban context of the general plan." Essentially, this bill requires a circulation element to plan for all modes of transportation where appropriate—including walking, biking, car travel, and transit.

The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and the disabled. For further clarity, AB 1358 tasked OPR to release guidelines for compliance, which were released in December 2010.

California Fire Code

The 2022 California Fire Code sets requirements pertaining to fire safety and life safety, including for building materials and methods, fire protection systems in buildings, emergency access to buildings, and handling and storage of hazardous materials (Title 24 Part 9 of the California Code of Regulations).

Regional

Regional Transportation Plan/Sustainable Communities Strategies

SCAG is the MPO for six counties: San Bernardino, Orange, Riverside, Los Angeles, Ventura, and Imperial, which encompasses an area of more than 38,000 square miles with a population exceeding 19 million persons. As the designated MPO, the federal government mandates that SCAG research and prepare plans for transportation, growth management, hazardous waste management, and air quality. SCAG has developed several plans to achieve these regional objectives, including the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS).

The RTP/SCS is a long-range plan that provides a vision for transportation investments throughout the southern California region. The RTP/SCS integrates land use and transportation strategies that will achieve CARB emissions reduction targets. The RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and utilize resources more efficiently. SCAG utilizes a regional travel demand model to analyze the air quality and transportation impacts of the RTP/SCS transportation and land use strategies. The SCAG travel demand model was used to inform the transportation impact analysis for the Project.

High-Quality Transit Areas

With adoption of the former 2012 RTP/SCS, the areas formerly known as 2% Strategy Opportunity Areas were replaced with what are now referred to as High-Quality Transit Areas (HQTAs). HQTAs are areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours (SCAG 2020). Most of the City is within an HQTA identified in the 2020–2045 RTP/SCS; the portions not within an HQTA include much of the Monterey Hills in the southwest corner of the City and small polygons at the northern and northeastern City boundary.

Transit Priority Areas

SCAG defines a Transit Priority Area (TPA) as an area within one-half mile of a major transit stop that is existing or planned (SCAG 2020). The one-half mile radius around Metro's A Line Station at the Mission Street and Meridian Avenue intersection and the one-half mile radius around the fixed bus stop at the Huntington Drive-Garfield Avenue-Atlantic Boulevard/Los Robles Avenue intersection are identified as TPAs in the 2020–2045 RTP/SCS.

Federal Transportation Improvement Program (SCAG Region)

The Federal Transportation Improvement Program (FTIP) is the implementation tool for the RTP/SCS and includes a listing of highway improvements, transit, rail and bus facilities, high occupancy vehicle lanes, signal synchronization, intersection improvements, freeway ramps, and other transportation projects that have been proposed by cities and local agencies in the SCAG region. The 2023 FTIP lists federally funded projects and regionally significant projects developed in compliance with State and federal requirements. The 2023 FTIP has been reviewed and adopted by SCAG. It has also been given an air quality conformity determination by the Federal Highway Administration (FHWA)/Federal Transit Administration (FTA).

South Coast Air Quality Management District, Air Quality Management Plan

The South Coast Air Quality Management District (SCAQMD) is the federally mandated agency that is assigned the responsibility for promulgating and enforcing regulations to achieve compliance with national and State air quality standards. SCAQMD's central mandate is reflected in its 2022 Air Quality Management Plan (AQMP), which is the region's blueprint for achieving air quality standards in the South Coast Air Basin, which includes the City. Because of the importance of motor vehicles—the primary source of air pollution—substantial emphasis is placed on reducing motor vehicle travel and increasing transit ridership. The 2022 AQMP relies on regulatory and incentive-based approaches to reducing pollution while eliminating reliance on future uncertain technologies.

County

Metro Long Range Transportation Plan

The Metro 2020 Long Range Transportation Plan (LRTP) is Metro's roadmap for how Metro will plan, build, operate, maintain, and partner for improved mobility in the next 30 years. The LRTP guides funding plans and policies needed to move Los Angeles County forward for a more mobile, resilient, accessible, and sustainable future. The vision of this program is to enhance the public transit program by investing in bus system while expanding the rail system. The LRTP is also delivering highway improvements such as new carpool lanes and projects that are easing freeway bottlenecks for both auto and truck traffic. Additionally, the LRTP invests in many other programs, including transit operations, highway maintenance, local street improvements, bicycle and pedestrian connections, and transit services for the disabled. The LRTP was adopted by the Metro Board of Directors on September 24, 2020.

Los Angeles County Measures R and M

Measure R is a half-cent sales tax for the County to finance new transportation projects and programs and accelerate those already in the pipeline. This measure took effect in July 2009. The Measure R Expenditure Plan devotes its funds to seven transportation categories as follows: 35 percent to new rail and bus rapid transit projects; 3 percent to Metrolink projects; 2 percent to Metro Rail system improvement projects; 20 percent to carpool lanes, highways and other highway-related improvements; 5 percent to rail operations; 20 percent to bus operations; and 15 percent for local city sponsored improvements. All Measure R funds will be spent in accordance with the plan approved by voters. There will be an annual independent audit and report to taxpayers and ongoing monitoring and review of spending by an independent taxpayer oversight committee.

Measure M, a half-cent sales tax ballot measure, was approved in 2016. Measure M was developed to address new transit and highway projects, enhanced bus and rail operations, and several other transportation improvements in the County. Metro's Program Management Plan serves as a strategic framework for Measure M Capital Project. The Program Management Plan summarizes program scope, schedule, and budget; provides organizational information for control systems, processes, responsibilities, and authority; describes agency policies, procedures, and interrelationships; establishes mechanisms for managing technical and financial risks; and demonstrates stakeholder accountability and transparency. Measure M is expected to fund 40 major highway and transit projects in the first 40 years. The goals of Measure M include easing traffic congestion; improving freeway traffic flow; expanding rail and rapid transit systems and improving system connectivity; repaving local streets, repairing potholes, and synchronizing signals; making public transportation more accessible, convenient and affordable for seniors, students, and the disabled; earthquake retrofitting bridges and keeping the transit and highway system safe and in good working condition; embracing technology and innovation; creating jobs, reducing pollution and generating local economic benefits; and providing accountability and transparency by protecting and monitoring the public's investment.

City

South Pasadena Climate Action Plan

The City of South Pasadena adopted the City's first Climate Action Plan (CAP) on December 16, 2020, a strategy for reducing its GHG emissions in accordance with Statewide targets. The CAP set a baseline for past and current GHG emissions. The CAP also intends to facilitate the reduction of GHG emissions throughout the City through the implementation of SCAG's 2016–2040 RTP/SCS, the current RTP/SCS at the time of CAP adoption, in a way that is practical, efficient, and beneficial to the community and enhances the City's desirable characteristics and qualities.

The foundation for developing GHG emissions reduction and climate adaptation measures is based on the City's existing work as detailed in the extensive plans and programs comprising the City's sustainability goals and vulnerability analysis. In the long term, the CAP will also help achieve multiple community goals such as lowering energy costs, reducing air pollution, supporting local economic development, and improving public health and quality of life.

SB 743 Transportation Impact Analysis Guidelines

The City adopted CEQA transportation analysis guidelines on May 20, 2020 (Resolution No. 7656), pursuant to SB 743, discussed above. The guidelines outline screening criteria and significance thresholds for land use plans, land development projects, and transportation projects.

For land use plans that would change population and/or employment, the SCAG model will be used to forecast the change in VMT. The model parameters will be determined by the City's Director of Public Works prior to each analysis.

The total VMT of the land use plan area will be divided by population (per capita) and service population (population plus employees). The comparison will use the same model year for both scenarios (i.e., a land use plan with a buildout of 2040 would be compared to a baseline year 2040 no project scenario). The baseline model scenario VMT per population and service population will also be reported in the analysis but will not be used to determine potential significant environmental impacts. A significant impact would occur if the VMT per capita or service population for the land use plan exceeds the VMT per population or service population of

the baseline. A cumulative significant impact would be the same as the project-level impact since the analysis includes all regional land use and transportation cumulative conditions.

South Pasadena Bicycle Master Plan Update

On August 17, 2011, the City Council approved an update to the City's Bicycle Master Plan. Utilizing the existing bicycle plan, the updated plan recommends programs and infrastructure improvements that upon implementation will lead to the development of a safe, inviting, and viable mobility choice for bicycle riders of all levels while reinforcing the small-town atmosphere commonly associated with the City.

South Pasadena Complete Streets Policy

On January 18, 2017, the City Council approved the City's Complete Streets Policy (Resolution No. 7497) to consider the needs of all users when evaluating available treatments for a project and can lead to the development of superior project designs that facilitate a multi-modal network for walking, biking, and driving.

Public Works Department

The City has historically focused on stopping the northern extension of the SR-710. The City's Public Works Department also works on regional and local policy issues related to improving mobility choices while reinforcing a small-town quality of life in South Pasadena that is connected to the larger Los Angeles region. This department also prepares local policy and planning documents. On a regional level, staff participates in the development of regional transportation plans such as Metro's LRTP and SCAG's RTP/SCS. Staff also represents the City at various stakeholder groups such as regional boards, working groups, technical advisory groups, and councils of governments.

In addition, the Public Works Department oversee transportation issues not related to policy, such as street paving, stop lights, signs, and traffic-calming. Other departments also oversee transportation issues not related to policy, such as the Dial-A-Ride program (Community Services Department); and parking (Police Department). Metro oversees all issues related to mass transit; the City is served by both the Metro A Line and Metro Bus systems.

It is noted that the Public Works Department has proposed several transportation improvement concepts to be included in, and thereby receive funding for, Metro's SR-710 Early Action Projects. This is happening concurrent with the General Plan and DTSP Update process, and in coordination with the adjacent municipalities (e.g., Alhambra, Pasadena). It is not known if funding will be received for some or all of the proposed concepts, and as such implementation of these concepts is not considered reasonably foreseeable for purposes of CEQA.

3.14.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse transportation/traffic impact if it would:

Threshold 3.14a: Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;

Threshold 3.14b: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b);

Threshold 3.14c: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and/or

Threshold 3.14d: Result in inadequate emergency access.

3.14.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.2 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

A1.2 Continue to channel Federal, State and Local transportation funds to programs, and infrastructure improvements that reduce air pollution through the promotion of walking, biking, ride-sharing, public transit use, the use of alternative fuel vehicles or other clean engine technologies.

P2.2 Focus employment-generating development primarily within the Ostrich Farm District, and as part of infill development in Downtown.

A2.2a Leverage locational strengths to reduce cost of new infill development.

P2.5 Invest in public improvements.

A2.5 Make infrastructure and public realm improvements such as larger sidewalks to accommodate outdoor seating, pedestrian and cyclist amenities, and streetscaping to create walkable, safe, and attractive shopping, dining, and recreational areas.

P.2.9 Adopt creative parking strategies Downtown and utilize public parking as a revenue source

A2.9a Allow public paid access to City-owned surface parking lots during nights and weekends (or other times when not in use by City facilities).

A2.9b Explore metered on-street parking on shopping streets.

A2.9c Consider reducing or eliminating on-site parking requirements on shopping streets to foster financial feasibility for developers and businesses, and establish a resident and employee Preferential Parking District to balance parking needs of businesses with nearby residents.

P2.10 Encourage a diversity of housing types to promote mixed-use districts and leverage transit access.

A2.10a Support higher-intensity and high-quality multifamily development near the Metro A Line Station, close to retail activity.

P4.1 Provide safe, comfortable, and convenient access to local destinations for people walking and bicycling in South Pasadena and integrate the local walking and bicycling network into the regional network to connect to adjacent jurisdictions and points beyond.

A4.1a Upgrade and enhance existing walking and bicycling facilities to support safety, comfort, and convenience, especially in Pedestrian Priority Areas and along Bicycle Priority Corridors.

A4.1b Enhance active transportation connections to and from the Metro A Line station.

A4.1c Ensure that walking facilities – including sidewalks, curb ramps, crossings, and trails – are accessible for people with physical impairments.

A4.1d Develop a signage master plan consistent with state regulations that specifies guidelines and requirements for the design of high-quality, user-friendly and attractive human-scaled signage directing people driving, walking, and bicycling to destinations and guiding them through the bicycle/pedestrian network.

A4.1e Encourage and/or require the provision of secure bicycle parking facilities at employment centers, commercial centers, recreational amenities, and civic amenities.

P4.2 Engage and educate the community to encourage people to walk and bike in South Pasadena for recreation, transportation, and health/fitness. Promote walking and biking as safe, enjoyable, convenient, and environmentally sustainable alternatives to automobile travel.

A4.2a Support bicycle and pedestrian safety education classes and programs in order to improve safety for all road users.

A4.2b Support programs that encourage South Pasadena residents, workers, and visitors to choose walking, bicycling, and other active modes of travel.

P4.3 Promote safety for all road users through compliance with – and enforcement of – traffic codes for drivers, bicyclists and pedestrians.

A4.3 Work with the South Pasadena Police Department to increase enforcement of traffic laws related to walking and bicycling.

P4.4 Ensure successful implementation of the active transportation policies and actions by developing programs and strategies for successfully implementing and funding pedestrian and bicycle projects and programs, and for maintaining pedestrian and bicycle facilities.

A4.4a Provide routine inspection and maintenance of pedestrian and bicycle facilities, including pavement repairs, restriping, maintenance of traffic control devices, landscape maintenance, and sweeping bike lanes and paths.

A4.4b Minimize disruption to pedestrians and when repairing and constructing transportation facilities, and provide alternate routes when necessary.

A4.4c Evaluate the progress and effectiveness of the Active Transportation policies and actions to achieve project and program goals.

A4.4d Regularly seek funding for the design and development of active transportation projects, and ensure awareness of current regional, state, and federal funding programs.

A4.4e Coordinate with federal, state, regional, county and local agencies to fund and implement bicycle and pedestrian projects in cooperation with other nearby jurisdictions.

P4.5 Support street designs that emphasize safety and accommodate all users, including pedestrians and cyclists. Ensure that streets are pedestrian-oriented, with complete sidewalks, regular crosswalks, and other measures to improve pedestrian safety and comfort. Limit the widths of vehicular lanes in order to discourage speeding (on truck routes or streets on which public transit operates, ensure that lanes are wide enough to safely accommodate large vehicles passing one another in opposite directions, and that intersections can accommodate turns by large vehicles).

A4.5a Conduct a study of potential speed management improvements to Fremont, with the objectives of a) establishing the need for safety improvements, and b) identifying improvements that would enhance safety while maintaining throughput levels compatible with neighborhood character.

A4.5b Evaluate the adequacy and appropriateness of existing designated truck routes and modify where appropriate based on findings (such as Fremont Avenue south of Huntington).

A4.5c Proceed with modifications to the "bulb-out" curb extensions on Fair Oaks. If some bulb-outs are removed as part of this process, implement alternative measures to protect pedestrians in the corridor including leading pedestrian intervals and enhanced crosswalks

A4.5d Identify and improve the safety and efficiency of crosswalks throughout the City, consistent with the requirements of State legislation including the Americans with Disabilities Act (such as Monterey Road and Pasadena Avenue).

A4.5e Prioritize adoption, funding, and implementation of a Neighborhood Traffic Management Program that identifies physical and operational changes to reduce traffic impacts throughout the City.

P4.6 Provide high-quality pedestrian and bicycle facilities to enhance the safety, comfort and convenience of people walking and bicycling in South Pasadena.

A4.6a Implement South Pasadena's Complete Streets Policy.

A4.6b Design roadways to safely accommodate all users, balancing the needs of people walking, bicycling, riding transit, and driving personal and commercial vehicles.

A4.6c Utilize roadway design/engineering best practices to ensure safe and effective pedestrian and bicycle infrastructure.

A4.6d Utilize best practices for the design of bicycle parking facilities in the public realm and at locations such as employment centers and schools.

P4.7 On streets identified as priorities for one specific mode of travel, such as bicycle routes, prioritize improvements for that mode. Ensure that bicycle lanes provide a high level of separation from traffic, using buffers, vertical elements or parked cars wherever possible.

A4.7a Proceed with implementation of Bicycle Master Plan projects.

A4.7b Update the Bicycle Master Plan to identify the appropriate locations and improvements for a Citywide network of bicycle paths and facilities.

A4.7c Study the viability of adding bicycle lanes to Fair Oaks Avenue and Mission Street.

P4.8 Maintain a roadway system that provides for the efficient movement of goods and people in South Pasadena, while maintaining the community's character and quality of life.

A4.8a Maintain the roadway network according to the street classifications depicted on Figure 7 Existing Roadway Designations.

A4.8b Require that development projects achieve no net increase in Vehicle Miles Traveled (VMT) per capita above current levels for comparable uses in the City of South Pasadena as determined in accordance with the City's Transportation Impact Analysis (TIA) Methodology (updated May 5, 2020).

P4.9 Reduce traffic congestion by modification of traffic signals, turning movements, and other operational changes that do not require increasing the width of rights-of-way or adding lanes to streets.

A4.9a Study the feasibility for reconfiguring the SR-110-Fair Oaks Avenue interchange to improve freeway access and egress and traffic flows.

A4.9b Identify traffic signal improvements where appropriate to optimize traffic flow at safe speeds by implementing adaptive traffic control system technology and synchronization.

A4.9c Encourage Metro and the California Public Utilities Commission to reduce signal delay at the Metro A Line crossing of Mission and Meridian while maintaining safety.

P4.10 Explore options to improve transit service within South Pasadena, including City programs and/or partnerships with Metro.

A4.10 Improve transit service within South Pasadena using one of four options:

1) Expand the City's existing dial-a-ride program to serve all residents (and not just older residents);
2) Implement a circulator shuttle, funded through a public-private partnership, providing connections at least every 30 minutes or more often during the day to the Metro A Line station and other major destinations;
3) Partner with Pasadena to expand Pasadena Transit service to South Pasadena;
4) Initiate a partnership with Metro to pilot "microtransit" on-demand service using smartphone apps.

P4.11 Facilitate safe and improved pedestrian and bicycle traffic between the Metro A Line station and major destinations.

A4.11a Study and develop a plan for sidewalk, signalization, crosswalk, bike ways, and other improvements on streets connecting the Metro A Line station with the downtown and surrounding neighborhoods (for example Mission Street at Prospect Avenue, El Centro Street between Mound and Edison Avenues, and Orange Grove Avenue at El Centro Street).

A4.11b Explore appropriate ways to improve the safety of pedestrians and cyclists at rail crossings.

P4.12 Encourage and facilitate shared-ride options include e-hailing services, carshare, and bikeshare. Increase awareness of multi-modal alternatives to driving to the Metro A Line station.

A4.12 In the near term, work with Metro and private partners (carshare companies) to identify "mobility hub" improvements that could be implemented at or near the Metro A Line station, such as additional, secure parking (lockers) for bicycles, a future bikeshare station and carshare vehicles stationed in the Mission Meridian Village Parking Garage.

P4.13 Proactively manage public and private parking supply within a common area as a shared resource, and focus on measures to ensure availability and access rather than simply increasing supply.

A4.13a Establish a Preferential Parking Permit Program that can be managed efficiently, incorporates minimum requirements for implementation and identifies appropriate revenue sources to pay for administrative costs. Cap the number of permits that may be issued to a household as appropriate.

A4.13b Periodically review Preferential Parking Permit program to make sure it is meeting the needs of designated locations.

P4.14 Establish resilient transportation investments by prioritizing flexibility and adaptability.

A4.14a Identify and implement additional passenger loading zones as needed by monitoring demand for pick-up\drop-off access to curbs.

A4.14b Where demonstrated parking shortages exist, provide information on parking availability nearby rather than increasing supply. Strategies for doing so may include Transportation Demand Management (TDM) and Parking Demand Management (PDM) measures.

A4.14c If public parking supply must be increased, prioritize those options with the potential for future conversion to other uses.

A4.14d Evaluate and plan for the use of shared vehicles (such as carshare, bikeshare, etc.), ride-hail, autonomous vehicles, and other emerging technologies that will affect the street network, traffic operations and management, parking, curbside drop-off, and adjoining land uses.

A4.14e Monitor for impacts associated with delivery and loading.

P4.15 Ensure new mobility services and options are accessible and safe for all.

A4.15a Expand the availability of shared bike, micromobility and microtransit options to offer a range of accessible mobility options.

A4.15b Develop clear policies around right-of-way and use of micromobilities in the public right-of-way.

A4.15c Work with technological providers to ensure diversity in the new transportation system.

P6.2 Roadway designs should prioritize safety and promote safe complete street networks that facilitate safe and comfortable walking and biking.

A6.2a Create safe and well-connected street networks for walking and biking to improve access to destinations, school zones, and other community services.

A6.2b Provide infrastructure to support safe biking.

A6.2c Teach children safe walking and biking behaviors. Implement walk to school days, walking school buses, and other similar events.

A6.2d Expand multi-modal mobility choices residents need to remain independent as they age.

A6.2e Engage the Police Department to partner with community groups to reduce the frequency of crime and traffic safety problems.

P8.6 Identify and remove barriers to park access. Encourage walking and biking as preferred way to get to and from parks.

A8.6a Increase visibility and access to Orange Grove Park by removing fence barrier.

A8.6b Improve sidewalk conditions leading to parks. Install a new sidewalk on Stoney Drive, the main access that leads down to the lower Arroyo.

A8.6c Provide bike lanes, and biking facilities such as racks and lockers.

P9.4 Make South Pasadena's arts, cultural, and heritage attractions visible and accessible to tourists and local audiences.

A9.4d Work with appropriate entities, such as Metro and ride hailing services, to provide multi-modal access and parking for attractions/events.

P9.6 Leverage the Metro A Line Station and the potential Metro Bike Share Center at the Station to promote attractions/events.

P9.6a Partner with Metro to advertise events and attractions to riders, and to sponsors community events (like 626 Golden Streets).

A9.6b Develop a marketing brochure that is printed regularly with information on things to see and do in South Pasadena. Distribute the brochure at hotels located near Metro stations.

Downtown Specific Plan Update

P1.1 Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel.

P2.4 Promote higher levels of foot traffic with activities and events.

P2.5 Explore new and existing capital funding sources for key public realm improvements.

A2.5 Pursue the appropriation of Metro funding resulting from the recently disbanded 710 freeway tunnel initiative for public realm objectives.

P2.7 Explore creative parking strategies to efficiently use available parking and generate potential revenues.

A2.7a Leverage publicly-owned parking lots by allowing public paid access during nights and weekends (or other times when not in use by public facilities).

A2.7b Explore metered on-street parking on shopping streets.

P4.1 Support street designs that emphasize safety and that accommodate all users, including pedestrians and cyclists.

A4.1a Ensure that streets are pedestrian-oriented, with complete sidewalks, regular crosswalks, and other measures to improve pedestrian safety and comfort such as compact corner radii, bulb out sidewalk extensions at crosswalks, leading pedestrian intervals at signals, additional safety measures potentially including pedestrian-actuated signals at unsignalized crosswalks, other traffic calming measures, and increased investments in sidewalk maintenance and lighting.

A4.1c Conduct a study of potential speed management improvements to Fremont Avenue, with the objectives of a) establishing the need for safety improvements, and b) identifying improvements that would enhance safety while maintaining throughput levels compatible with neighborhood character.

A4.1d Proceed with modifications to the "bulb-out" curb extensions on Fair Oaks. If some bulb-outs are removed as part of this process, implement alternative measures to protect pedestrians including leading pedestrian intervals and enhanced crosswalks.

P4.2 On streets identified as priorities for one mode of travel, such as bicycle routes, prioritize improvements for that mode.

A4.2a Ensure that bicycle facilities provide a high level of separation from traffic using buffers, vertical elements, or parked cars wherever possible; and consider speed limit adjustments pursuant to Assembly Bill 43.

A4.2b Proceed with implementation of Bicycle Master Plan projects.

P4.3 Reduce traffic congestion by reconfiguring outmoded interchanges and traffic signals rather than adding lanes to streets.

A4.3a Synchronize traffic signals wherever possible to optimize traffic flow at safe speeds.

A4.3b Work with Metro and the California Public Utilities Commission to reduce signal delay at the Metro A Line crossing of Mission Street and Meridian Avenue while maintaining safety.

P4.4 Explore options to improve transit service within South Pasadena, including City programs, public/private partnerships, and/or partnerships with Metro.

A.4.4a Maintain the City's existing Dial-A-Ride program.

A4.4b Initiate a partnership with Metro to pilot "microtransit" on-demand service using smartphone apps.

P4.5 Seek resiliency in transportation investments.

A4.5a Evaluate, design, and maintain critical components of the transportation system to be fail-safe, self-correcting, repairable, redundant, and autonomous.

A4.5b Develop a well connected multi-modal transportation network that provides multiple options to access Downtown destinations.

A.5c Support development of diverse and competing transportation services, such as ride-sharing, delivery services, and use of telecommunications to substitute for physical travel.

P4.6 Identify important pathways for pedestrian and bicycle travel between the Metro A Line station and major destinations, and make improvements to safety and comfort along these paths.

A4.6a Add an unsignalized crosswalk, with accompanying safety measures, on Mission Street at Prospect Avenue.

A4.6b Add a sidewalk on the north side of El Centro Street between Mound and Edison Avenues.

A4.6c Reconfigure the intersection of Orange Grove Avenue and El Centro Street to require slower right turns by vehicles from southbound Orange Grove Avenue onto westbound El Centro Street.

A4.6d Over the longer term, work with Metro to explore options for grade-separation of existing Metro A Line at-grade crossings including Monterey Road/Pasadena Avenue.

P4.7 Encourage and facilitate shared-ride options include e-hailing services, carshare and bikeshare.

A4.7a In the near term, work with Metro and private partners (carshare companies) to identify mobility hub improvements that could be implemented at or near the station, such as

additional, secure parking (lockers) for bicycles, a future bikeshare station, and carshare vehicles stationed in the Mission Street/Meridian Avenue garage.

P4.8 Proactively manage public and private parking supply within a common area as a shared resource, and focus on measures to ensure availability and access rather than simply increasing supply.

A4.8a Explore opportunities to increase availability of public parking through private development.

A4.8b Seek to balance the need for vehicular access to properties with other imperatives, such as the need to reduce traffic for purposes of safety and environmental impact.

A4.8c Review the time limits and other regulations for on-street parking supply in Downtown and streamline regulations to improve the ease of interpreting parking rules.

A4.8d Develop an enhanced wayfinding system of signage directing motorists to public parking lots in Downtown.

A4.8e Periodically monitor parking availability in Downtown. If parking availability becomes a significant access challenge, consider demand management measures combined with an associated benefit district.

A4.8f Develop a simplified process to permit the use of curbside and on-site parking areas for outdoor dining and other amenities with possible differentiation of standards for improvements on Mission Street and Fair Oaks Avenue, compatibility with traffic flow and bicycle lanes, and flexibility to adjust over time due to experience in implementation.

P6.2 Lead with roadway design that prioritizes safety. Promote safe networks of complete streets that facilitate safe and comfortable walking and biking.

A6.2a Repurpose Mission Street and Fair Oaks Avenue to include safe and well-connected street networks for walking and biking, and to improve access to destinations and other community services.

A6.2b Partner with law enforcement and community groups to reduce the frequency of crime and traffic safety problems.

A6.2c Augment pedestrian activity and social interaction along Mission Street; provide more sidewalk space, and provide a series of parklets distributed throughout the street.

A6.2d For blocks over 400 feet long on Mission Street, provide mid-block crossings that encourage pedestrian activity along and across the street.

A6.2e Pave and enhance Pico Alley with string lights, east of the Metro A Line station, so it becomes a gathering space as well as an important pedestrian connection from the station to the eastern blocks, without as an alternative to Mission Street.

A6.2f Pave and enhance with trees and string lights Edison Alley, behind the Rialto, so it becomes a distinct north-south pedestrian connection, connecting the Rialto to Mission Street.

P6.3 Increase infrastructure that supports biking.

A6.3a Encourage existing and new development to provide secure indoor bicycle parking in the form of indoor racks or storage rooms to ensure security and weather protection, and provide outdoor bike racks.

P7.1 Make Downtown streets safe for pedestrians and bicyclists.

A7.1a Carry out the safety enhancements recommend by the Downtown Vision for Mission Street and Fair Oaks Avenue.

A7.1b Add mid-block crossings and parklets on Mission Street.

A7.1c Amend the development codes to allow context sensitive street types.

P8.3 Promote a new balanced traffic culture including walking and cycling for all age groups.

A8.3a Support and develop existing publicly-owned right-of-ways and streets into temporary and permanent open spaces like parklet, curb extension, mid-block crossing, sidewalk extension, shared street, and temporary open street or street park.

A8.3b Transform Mission Street and Fair Oaks Avenue into complete streets that promote safe walking and cycling.

DTSP Catalytic Projects

The DTSP includes Catalytic Projects, which are proposed for potential future implementation because they would support the General Plan and DTSP Update and improve all modes of transportation in the downtown area, including:

Public Improvement Projects

- Fair Oaks & Mission Intersection Enhancement – This project enhances the intersection of Mission Street & Fair Oaks Avenue into a pedestrian-friendly crossing and a visually attractive place. It repaves the entire intersection to define the crossing as a definitive center. The southeast and southwest parcels at this intersection are envisioned with new infill buildings with a quality and character appropriate to enhancing this place.
- Parklets on Mission Street – To augment pedestrian activity and social interaction along Mission Street, and to provide more sidewalk space, a series of parklets are proposed to be distributed throughout the street. Parklets would occupy the space of parallel parking stalls, and are designed as intimate places for outdoor gathering. The introduction of parklets along Mission Street in place of on-street parking received a jump start during the COVID-19 pandemic triggered by the need for restaurants to provide more outdoor dining space. Parklets are envisioned to be less prevalent in the tree-lined formality of Fair Oaks Avenue.
- Mid-block crossings on Mission Street – These crossings help break the large block lengths and encourage pedestrian activity along and across the street. Mid-block crossings should be added where locations meet the City-established thresholds for safety and pedestrian activity.
- Mission Street Mobility Enhancement – Pending further study, Mission Street could become a Main Street with two travel lanes, two bicycle lanes, and parallel parking on both sides. This would reinforce the character of Mission Street as a bicycle-friendly street connecting the Metro A Line station to Fair Oaks Avenue.
- Fair Oaks Boulevard Mobility Enhancement – Fair Oaks Avenue is envisioned to be configured as a grand double-tree lined north-south arterial. It could be restriped to have four travel lanes, two bicycle lanes and parallel parking on both sides. The bicycle lanes are located closest to the street curb and separated from the parallel parking by potted plants in the initial phases and permanent planters in the eventual phases. Bulb outs at

each inter-section could help slow traffic speeds but must be designed to work with the bike lanes for continuous bicycle accessibility.

- Metro Area Enhancement – The area around the Metro A Line station is significantly enhanced. The existing triangular park to the east of the station should be retained. The asphalted road to the east of the station could be redesigned as a paved plaza. The existing historic monuments and Oak trees in this space should likewise be retained. The intersection of Mission Street and Meridian Avenue could be paved to enhance pedestrian connectivity on both sides of Mission Street. The station platform should be directly connected to open spaces on both west and east by stairs or ramps directly from the platform.
- Pico Alley enhancement – The existing alley east of the station could be paved and enhanced with string lights. The alley could become a gathering space as well as an important pedestrian connection from the station to the eastern blocks, as an alternative to Mission Street.
- Edison Lane enhancement – The existing alley behind the Rialto Theater could be paved and enhanced with trees and string lights to become a distinct north-south pedestrian connection between the Rialto Theater and Mission Street.

Public Improvement Projects with Private Collaboration

- Parking Structure adjacent to freeway – The plan envisions a “park-once” parking structure to serve the northern area of the Fair Oaks Avenue zone. The structure could be located in the vicinity of the 110 Freeway.
- Various parking garages as part of infill projects – The plan encourages private infill development to facilitate public access to parking for a fee. Providing public parking in this manner allows the City to reduce its own expenditures on public parking garages. It also serves to distribute public parking throughout the district and makes private development a part of the solution by providing for the needs of a walkable commercial district.

Private Projects with Municipal Collaboration

- Various Infills along Fair Oaks Avenue
- The plan envisions various mixed-use infill developments along Fair Oaks Avenue. These infills will be up to 4 to 6 stories tall, with active ground floors lining the sidewalks. In order to ensure that the form and character of these new buildings is not monolithic, a number of standards and guidelines are provided as part of this vision to enable contextually sensitive development.
- Various Infills along Mission Street – New infill along Mission Street will be up to 4 to 5 stories tall with a two-story base, keeping the existing scale of Mission Street. To enable new buildings to preserve the historic two-story context of Mission Street, building frontage along Mission Street will have a two-story base. The massing for additional floors will provide a stepback of six feet.
- South Pasadena Unified School District site development with central parking plaza – This is a mixed-use development with retail at the street level facing Mission Street, and residential uses at the upper floors. The historic buildings are preserved. It is possible for this project to retain the existing central parking lot in part or whole. This space is currently used as flex space both for public parking as well as an event space on various occasions.

The lot could be paved and converted into an attractive plaza like space used flexible for parking and other uses.

- Plaza at corner of Fair Oaks Avenue and Mission Street – This triangular plaza could be done as part of the private infill development on the parcel at the southeast and south-west corner of Fair Oaks Avenue and Mission Street.

2021–2029 Housing Element Implementation Programs

There are no Housing Element Implementation Programs goals or policies related to transportation.

3.14.6 ENVIRONMENTAL IMPACTS

Threshold 3.14a: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Our Accessible Community element of the General Plan and DTSP Update is consistent with the planning goals of the 2020–2045 RTP/SCS and Metro's LRTP. Consistency with the 2020–2045 RTP/SCS is discussed further in Section 3.10, Land Use and Planning. The four priorities identified in the Metro LRTP include:

1) We envision better transit, with seamless trips for riders traveling across LA to learn, work or play;
2) Our vision is less congestion, where traffic flows more freely and travel times are more certain;
3) We will team up to make complete streets, which area safety and more accessible for everyone; and
4) We will increase access to opportunity to better connect everyone to what they need most.

As discussed previously, the Metro LRTP is a roadmap for how Metro will plan, build, operate, maintain, and partner for improved mobility in the next 30 years; as such, Metro is the primary agency implementing the LRTP. However, as shown in the discussion of transit, bicyclist, and pedestrian transportation below combined with the proposed land use plan that focuses on intensification of land uses in proximity to light rail and bus transit demonstrates consistency of the Project with Metro's LRTP. Additionally, under the Complete Streets Act, general plans are required to include planning for complete streets—that is, streets that meet the needs of all users of the roadway, including pedestrians, bicyclists, users of public transit, motorists, children, the elderly, and the disabled. The General Plan and DTSP Update are consistent with the Complete Streets Act by supporting the City's Complete Streets Policy. As demonstrated in Section 3.14.5 above, the General Plan and DTSP Update includes extensive policies and actions focusing on roadways, complete streets, transit, and bicyclist and pedestrian travel as a key component of the overall land use plan and planning program for the City into the future.

Transit

Policies and actions related to supporting transit facilities in the City include prioritizing multimodal systems, supporting first/last mile connectivity to transit, implementing additional complete streets improvements when it fits the context of the community, and supporting the improvement of transit opportunity corridors. In addition, the DTSP's Catalytic Metro Area Enhancement Project supports

improved station conditions and access by directly connecting the station platform to open spaces on both the west and the east.

Bicyclist Travel

Future bicycle facilities are a mixture of bicycle routes, bicycle lanes, and bicycle paths. Future bicycle facilities from the Bicycle Master Plan are included in the General Plan Update. Policies and actions related to supporting bicycle travel in the City include prioritizing multimodal systems, maintaining a network of complete streets to provide mobility opportunities for all users, implementing additional complete streets improvements when it fits the context of the community, developing and maintaining local and regional bicycle networks, and promoting bicycle safety when infrastructure improvements are made. In addition, the DTSP Catalytic Projects including the Fair Oaks and Mission Intersection enhancement, Mission Street Mobility Enhancement, Fair Oaks Boulevard Mobility Enhancement, and the Metro Area Enhancement support bicycle transportation and access.

Pedestrian Travel

Policies and actions related to supporting pedestrian travel include promoting the development of mixed-use, pedestrian-friendly areas clustered around activity centers; encouraging community interaction through the development and enhancement of plazas, open space, public places, and pedestrian connections with the public realm; and enhancing streets to facilitate safe walking through community participatory design. In addition, the DTSP Catalytic Projects including the Fair Oaks and Mission Intersection enhancement, Parklets on Mission Street, Mission Street Mobility Enhancement, Fair Oaks Boulevard Mobility Enhancement, and the Metro Area Enhancement support pedestrian activity.

Conclusion

In summary, implementation of the Project would support improved public transit, bicycle, and pedestrian facilities as well as roadway circulation. Iteris' review of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs concluded that there are no potential inconsistencies or conflicts with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or the performance or safety of those facilities. The General Plan and DTSP Update incorporate future networks and policies related to supporting transit, bicycles, and pedestrians in the City. These networks are consistent with regional and local planning efforts supporting these modes of travel. Additionally, the General Plan and DTSP Update have numerous policies supporting complete streets (providing accessibility for all users of all ages and abilities) and active transportation, as discussed above. There would be no conflicts with a program, plan, ordinance or policy addressing the circulation system. Therefore, there would be no impact and no mitigation is required.

Threshold 3.14b: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The VMT analysis by Iteris for the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs was prepared in conformance with the City of South Pasadena's Transportation Analysis Guidelines for land use plans. As mentioned previously, for land use plans that change population and/or employment, the SCAG model was used to forecast the change in VMT. The significance determination is based on comparison of a baseline scenario to a "With Project" scenario. Existing Year and Year 2040 (i.e., buildout year) analyses were conducted. The baseline model scenario VMT per population and service population are also

reported in the analysis but are not used to determine potential significant environmental impacts. A significant impact would occur if the VMT per capita or service population for the land use plan exceeds the VMT per population or service population of the baseline. A cumulative significant impact would be the same as the Project-level impact since the analysis includes all regional land use and transportation cumulative conditions.

The transportation network used for the transportation analysis was the 2040 SCAG RTP/SCS travel demand model network, which is consistent with the Metro LRTP. The travel demand model includes modal modules for transit and intrazonal (walking and biking trips); however, changes to the transit and active transportation networks were not made in the "With Project" scenarios for the transportation modeling. Therefore, the model conservatively compares only changes to travel behavior due to the land use changes supported by the Project of additional employment sites and residential units in the City.

Whereas the Project would result in additional employment and population growth, it does not identify the precise locations of the growth. The City provided locations for office and retail, development consistent with General Plan Update P2.2: employment-generating development in concert with affordable housing will be explored primarily within the Ostrich Farm District and as part of infill development in Downtown. The Ostrich Farm District is already home to creative offices and is therefore a natural area for expansion. General Plan Update P2.2 also states that new infill office development on Mission Street and Fair Oaks Avenue can leverage the City's transit connectivity and provide a daytime shopping population to support surrounding retail businesses and restaurants.

Detailed housing distribution is based on the availability of sites for housing in the City's 2021–2029 Housing Element Implementation Programs to meet the requirements of the RHNA. The addresses of potential residential development parcels were used to allocate single-family and multifamily housing units in the model socioeconomic data for the "With Project" model scenario. Accessory dwelling units (ADUs) are allowed in all City zones that allow for single-family and multifamily residential units.

The City of South Pasadena is represented by five traffic analysis zones in the SCAG travel demand model. The allocation of land uses to these zones for purposes of the VMT analysis is shown in Exhibit 3.14-1, City of South Pasadena Traffic Analysis Zones. It is noted that this is not meant to reflect the precise distribution of land uses that would or should eventually be developed but is a representation of a reasonably foreseeable buildout scenario based on the above assumptions for purposes of modeling VMT. The real-life distribution of land uses that would generate VMT will vary. Also, this modeling is analyzing the VMT generation of all land uses based on the existing circulation system. In reality, individual projects would be built incrementally over time and, where necessary, circulation improvements would be implemented by Public Works.

Table 3.14-2 summarizes the results of the VMT modeling for buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, comparing the baseline scenario to "With Project" scenario in the existing conditions (2023) and future conditions (2040).

TABLE 3.14-2
VMT PER CAPITA AND VMT PER SERVICE POPULATION FOR THE GENERAL PLAN AND DTSP UPDATE & 2021—2029 HOUSING ELEMENT IMPLEMENTATION PROGRAMS

Scenario	Home-Based VMT	Population	VMT/ Capita	Total VMT	Service Population	VMT/Service Population
Existing Baseline No Project	371,493	25,580	14.5	961,265	39,280	24.5
Existing Baseline With Project	349,757	32,093	10.9	1,152,534	47,761	24.1
Future Year 2040 Baseline No Project	324,479	25,580	**13.5**	911,531	39,280	**23.2**
Future Year 2040 With Project	344,985	32,083	**10.1**	1,066,474	47,761	**22.3**

As shown, the results of the transportation analysis indicate the Future Year 2040 With Project would have a lower VMT per capita and VMT per service population than the Future Year 2040 Baseline. Furthermore, the policies and actions of the General Plan and DTSP Update promote the reduction of VMT both explicitly (General Plan Update A4.8b–Require that development projects achieve no net increase in Vehicle Miles Traveled [VMT] per capita above current levels for comparable uses in the City of South Pasadena as determined in accordance with the City's Transportation Impact Analysis [TIA] Methodology [updated May 5, 2020]); and as supportive of actions to reduce vehicle travel (General Plan Update P1.2–Promote alternative transportation modes like walking, biking, and transit that reduce emissions related to vehicular travel). Therefore, the Project would not conflict or be inconsistent with Section 15064.3(b) of the State CEQA Guidelines. There would be less than significant impact, and no mitigation is required.

Threshold 3.14c: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The General Plan and DTSP Update supports circulation network improvements that would be subject to review and future consideration by the City's Public Works engineering staff. Transportation improvements to the existing roadway network, either those contemplated in the General Plan and DTSP Update and/or those proposed as part of Metro's LRTP, would be implemented with the goal of safer and more efficient traffic movement, for all modes of travel. An evaluation of the roadway alignments, intersection geometrics, and traffic control features would be needed, and all roadway improvements would be made in accordance with the City's design standards and meet design guidelines of the California MUTCD.

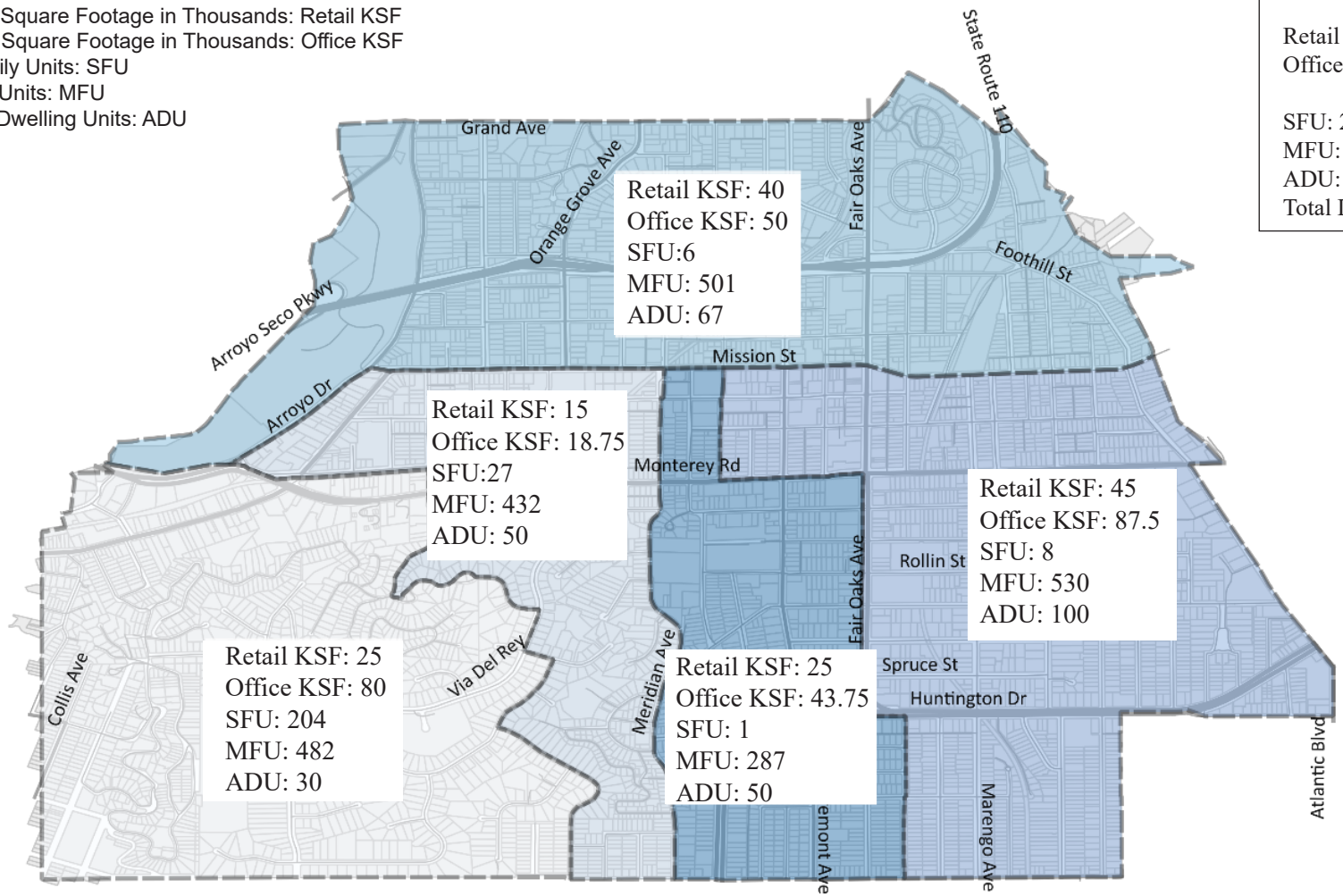
Roadway and other transportation improvements that may be implemented in the future would involve only existing streets, ramps, driveways, and sidewalks. In some instances, addition of new streets may be necessary to break up the large-scale super-blocks into pedestrian-oriented blocks, or complete a block with missing buildings, open space, or infrastructure. No new major streets or other substantial alterations to the existing roadway network could be accommodated as the City is essentially built out. The proposed growth that could be implemented under the Project involves the same land uses already developed within the City, and as part of the City's transportation pattern. Therefore, these land uses would not be considered incompatible. The General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would

Key:
New Retail Square Footage in Thousands: Retail KSF
New Office Square Footage in Thousands: Office KSF
Single Family Units: SFU
Multifamily Units: MFU
Accessory Dwelling Units: ADU

Total City

Retail KSF: 130,000
Office KSF: 300,000

SFU: 246
MFU: 2,232
ADU: 297
Total Dwelling Units: 2,775



Iteris 2023

City of South Pasadena Traffic Analysis Zones

Exhibit 3.14-1

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

N W E S

PSOMAS

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result in no impacts related to substantially increasing a hazard due to a design feature or incompatible uses, and no mitigation is required.

Threshold 3.14d: Would the Project result in inadequate emergency access?

Evacuation routes include major roadways in the City, with SR-110 and Interstate 210 freeways serving as primary regional exit routes. No major change to the existing roadway system serving the City is proposed. As discussed under Threshold 3.14a, transportation improvements contemplated by the City would be implemented with the goal of safer and more efficient traffic movement. This would include traffic during an emergency or evacuation. There would be no impact related to operation of future transportation improvements, and no mitigation is required.

Access to individual development sites would be made available through existing or planned on-site roadways/driveways, as required under Section 36.310.090 “Driveways and Site Access” of the South Pasadena Municipal Code (SPMC). Section 36.310.090 of the SPMC defines requirements for all access from public streets to private properties that ensure adequate and safe access by vehicular and other traffic. The plan check and building permit process by the South Pasadena Fire Department includes review of access for emergency vehicles in accordance with the *California Fire Code*, as adopted by reference by the City (Chapter 14 of the SPMC). Compliance with the requirements for emergency lane width, vertical clearance, and distance would provide adequate emergency access to all new development implemented pursuant to the General Plan and DTSP Update and public and infrastructure projects. There would be no impact related to operation of future land uses, and no mitigation is required.

Construction activities on public rights-of-way may temporarily block traffic and access near the construction zones. As discussed above, compliance with Section 36.310.090 of the SPMC in the design and construction of future projects would always maintain emergency access to individual parcels. Impacts on traffic flows for emergency response or evacuation would be less than significant during construction activities, and no mitigation is required.

3.14.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Future development pursuant to the General Plan and DTSP Update, public and infrastructure projects, and future growth and development throughout the San Gabriel Valley, and in the rest of the region would increase the number of vehicle trips to, from, and through the City. Traffic congestion is expected to increase on freeways and major roadways if no changes to the existing transportation network are made. Some vehicle trips would be confined to the City (short trips), while other trips would travel outside the City to surrounding cities and urban centers and would affect the regional transportation system. Based on regional traffic forecasts, SCAG has identified regional transportation improvements to meet the transportation and circulation needs of the region in its RTP/SCS and FTIP. Additional freeway travel lanes, expanded transit services, rapid bus transit expansion, high-speed rail service, dedicated truck lanes, and other projects are planned and accounted for in the travel forecasts.

As discussed above, the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs includes numerous policies in support of and consistent with regional plans and policies for the circulation system, reflecting all modes of travel. These policies and

actions, as well as DTSP Street Standards and Catalytic Projects, if implemented, would benefit not only local circulation but regional circulation. Therefore, there would be a less than significant cumulative impact related to conflict with circulation system plans, ordinances, or policies.

Traffic issues are generally regional in nature, with drivers and travelers commuting throughout the Southern California region to places of employment and residence. As discussed previously, the VMT transportation analysis presented above includes the assessment of cumulative traffic impacts. A cumulative significant impact would be the same as the project-level impact since the analysis includes all regional land use and transportation cumulative conditions. Based on the analysis presented above, there would be less than significant cumulative impacts related to transportation consistent with the methodology presented in Section 15064.3(b) of the State CEQA Guidelines.

As discussed above, the Project would result in no impacts related to traffic hazards, incompatible uses, or emergency access. Therefore, the Project would not contribute to cumulatively considerable impact related to these issues. As discussed, the Project would result in less than significant impacts related to emergency access during construction activities associated with future projects; this impact would be temporary and intermittent. This would not be considered a cumulatively considerable impact to emergency access.

3.14.8 MITIGATION MEASURES

No significant adverse impacts related to transportation have been identified with implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. Therefore, no mitigation is required.

3.14.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative level.

3.15 UTILITIES AND SERVICE SYSTEMS

3.15.1 METHODOLOGY

This section addresses utilities and service systems that would be used with implementation of the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project (Project) and analyzes potential impacts on the availability and capacity of the local providers for the following utilities and service systems (the service provider is noted parenthetically):

- Water supply and distribution (City of South Pasadena);
- Wastewater facilities (City of South Pasadena [sewage conveyance] and County Sanitation Districts of Los Angeles County [sewage treatment]);
- Solid waste disposal (Athens Services [waste collection] and County Sanitation Districts of Los Angeles County [landfill disposal]); and
- Dry utilities (Southern California Edison and Clean Power Alliance [electric], Southern California Gas Company [natural gas], and various telecommunications companies).

Storm drainage facilities are addressed in Section 3.8, Hydrology and Water Quality. Information presented in this section was derived from the City's and the respective utilities' websites, the existing General Plan, proposed General Plan and DTSP Update, proposed & 2021–2029 Housing Element Implementation Programs, interim drafts of the 2020 Urban Water Management Plan (UWMP) and Integrated Water and Wastewater Resources Management Plan (IWWRMP) being prepared by the City, information from the City Public Works Department staff, and the Recirculated Notice of Preparation comment letter from the County Sanitation Districts of Los Angeles County regarding wastewater.

3.15.2 EXISTING CONDITIONS

Water

Water Supply Sources

The City of South Pasadena supplies water to approximately 24,650 residents[1] through approximately 6,200 active connections. The City's water supply sources include groundwater from the Main San Gabriel Groundwater Basin (Basin), treated imported water from the Metropolitan Water District (MWD) via Upper San Gabriel Municipal Water District (Upper District) connection to the Upper San Gabriel Area 2 (USG-2), and purchased water from the City of Pasadena (South Pasadena 2021). Each of these water sources is discussed further below.

Main San Gabriel Basin

The total fresh water storage capacity of the Basin is estimated to be approximately 8.7 million acre feet (af). Of that storage, about one million af is historically considered to have been actively managed for local public water supply. The Court adjudication of the Basin in 1973 provided for groundwater management that allows operation of basin storage to meet water demands and

[1] Estimated number of current residents receiving potable water from the City is different from the estimated 2021 City population used throughout the rest of this PEIR because they are derived using different methodologies and used for different purposes.

provide a mechanism to fund the purchase and replenishment of untreated imported water to supplement recharge of local water. The management of Basin storage and the use of supplemental imported water for recharge expand and increase the reliability of the available Basin groundwater supply (South Pasadena 2021).

Although there is no limit on the quantity of groundwater that may be extracted by Parties to the Basin adjudication, including the City, groundwater production in addition to a pumper's proportional share of the Operating Safe Yield, requires the pumper to bear the cost of imported Replacement Water to recharge the Basin. The City's share is currently 1.80520 percent of the Operating Safe Yield. Untreated imported water for replacement/recharge purposes is purchased from one of three municipal water districts overlying or partially overlying the Basin that provide imported water for groundwater replacement/recharge or for direct use. The three municipal water districts are Upper District, San Gabriel Valley Municipal Water District (SGVMWD) and Three Valleys Municipal Water District (TVMWD). The City is located within Upper District's service area. The management of the Basin and the large volume of groundwater in storage allow groundwater producers, including the City, to produce groundwater even when replacement water is not available. Any requirement to purchase untreated imported water for replacement/recharge purposes can be met when such water is available in the future. Also, there is the cyclic storage provision allowing producers, like the City, to store supplemental water within the Main San Gabriel Basin for the purpose of supplying a future replacement water requirement. For example, the City and other producers have added/deducted from cyclic storage accounts and as a result, have a total balance of approximately 60,044 af in cyclic storage accounts as of April 2021 illustrating the effectiveness of this water resource program in meeting the replacement water requirements of water producers.

The Operating Safe Yield in the Basin has averaged about 150,000 acre-feet per year (afy) over the past several years (fiscal years 2015-2016 through 2023-2024) plus the surface water rights are fixed at about 10,500 af for a total of about 160,500 af of water rights. Over the past five years, the average water production from the Main San Gabriel Groundwater Basin has been approximately 194,462 afy, and the average replacement water requirements and cyclic storage deductions (total Basin over production) has been approximately 33,512 afy. These, however, are averages. As noted above, producers in the Basin currently have a positive balance in cyclic storage accounts.

The City has four wells located within the Main Basin: Graves Well No. 2, Wilson Well No. 2, Wilson Well No. 3 and Wilson Well No. 4 with approximate pumping capacities of 705 gallons per minute (gpm), 750 gpm, 1,960 gpm and 1,100 gpm, respectively. The City installed a volatile organic compound (VOC) treatment system (Granular Activated Carbon and Ion Exchange) at Graves Well No. 2 in 2020. Wilson Well No. 2 is inactive as of June 2018, but City staff indicated there are plans to rehabilitate its Wilson Well No. 2 by 2025. The City installed a VOC treatment system (Granular Activated Carbon treatment) at Wilson Wells No. 3 and No. 4 in December 2018. The current collective well capacity from Graves Well No. 2, Wilson Wells No. 3 and No. 4 is about 4,960 gpm or about 7.1 million gallons per day (mgd). By 2045, the collective capacity from Graves Well No. 2, Wilson Wells No. 2, No. 3 and No. 4 is anticipated to be about 4,500 gpm or about 6.5 mgd. Assuming the City wells were limited to 75 percent of capacity during calendar years 2020 through 2045, the available pumping capacity would be about 5.3 mgd (about 5,900 af) in 2021 and about 4.9 mgd (5,500 af) in 2045. Over the past 20 years, the City's groundwater production has ranged from approximately 1,950 afy to approximately 5,264 afy, with an average production of approximately 4,026 afy (Watermaster 2020).

Imported Water

The City can receive direct deliveries of treated imported water through its MWD connection through Upper District (USG-2), which has a capacity of 4,500 gpm or 6.5 mgd. Historically, treated import water accounted for less than five percent of the City's total water demands. In addition, the City purchases water from the City of Pasadena through any of three interconnections to serve a small portion of the City's service area. The three interconnections have a total capacity of approximately 2,000 gpm. The City regularly uses one of the three interconnections located at the northeasterly corner of the City's distribution system and receives an average of 17 afy from the City of Pasadena as a source of the City's supply, which is less than one percent of the City's total water demands (South Pasadena 2021).

Water Storage and Distribution

The groundwater well sites identified have associated booster stations and storage reservoirs to provide contact time for disinfection. These include the Wilson Reservoir, with a capacity of 1.3 MG, and the Graves Reservoir, with a storage capacity of 1.0 MG. The City has five different pressure zones: Pasadena, Raymond, Bilicke, Central, and Magnolia. The City has the following additional storage reservoirs: Garfield Reservoir (6.5 MG), Grand Reservoir (2.4 MG), and Westside Reservoir (2.0 MG) located in the Central zone; and Bilicke (0.15 MG) and Raymond (0.15 MG) elevated tanks located in the Bilicke and Raymond zones, respectively. The City of Pasadena connection supplying water to the Pasadena zone operates on a continuous basis. There are four distribution booster stations located within City limits that provide water to the different pressure zones. Therefore, the total water storage capacity of the City is 13.5 MG. The City distributes potable water via 6,200 water meters that are connected by 67.7 miles of water pipes located throughout the City (South Pasadena 2017a).

Wastewater

Wastewater Conveyance

The City operates and maintains a sanitary sewer collection system, which consists of approximately 53 miles of gravity sewer lines which ultimately flow into larger trunk lines owned and operated by the County Sanitation Districts of Los Angeles County (LACSD). This 24-inch diameter trunk sewer line has a peak capacity of 8.4 million gallons per day (mgd) and conveyed a peak flow of 3.2 mgd (37 percent of capacity) when last measured in 1993.

The City's sewer system operates under Los Angeles Regional Water Quality Control Board (LARWQCB) Permit Number 4SS010436 and the City is responsible to ensure compliance with Order 2006-003-DWQ. This LARWQCB order requires the City to take a proactive approach to ensure a Citywide operation, maintenance, and management plan is in place to reduce the number and frequency of Sanitary Sewer Overflows (SSO) within the City. In January 2012, the City entered into a consent judgment with the State Regional Water Quality Control Board (SWQCB) as a result of a number of SSO experienced in the City's sanitary sewer system. The consent judgment requires the City to repair certain deficiencies identified through the City's sewer video inspection program within a specified period of time. Phase 1 of the sewer repairs started in 2014 and was completed in year 2015. Phase 1 addressed 233 pipe segments totaling approximately 64,000 lineal feet of sewer lines. In March 2017, the City Council awarded a construction for Phase 2 of the sewer repair project. The project consisted of a comprehensive multi-year capital improvement sewer program to satisfy the terms of the consent judgment on a broader scale. The project addressed all of the remaining deficiencies of the consent judgment and consisted of

approximately 107,100 linear feet of sewer mains and modification of 143 existing flush tanks. This project was completed in December 2017, improving approximately 60 percent of the City's sanitary sewer lines through sewer lining or full pipe replacement.

Wastewater Treatment

Wastewater from the City is treated at either the LACSD's Whittier Narrows Water Reclamation Plant (WRP) located near the City of El Monte or at the Los Coyotes WRP located in the City of Cerritos depending on LACSD's operations and/or diversion settings. The Whittier Narrows WRP, located near the City of El Monte, has a design capacity of 15 million gallons per day (mgd) and currently processes an average flow of 9.9 mgd (approximately 66 percent of capacity). The Los Coyotes WRP, located in the City of Cerritos, has a design capacity of 37.5 mgd and currently processes an average flow of 21.3 mgd (approximately 57 percent of capacity) (South Pasadena 2017a, LACSD 2021).

Solid Waste

The City of South Pasadena contracts with Athens Services (Athens) as its residential and commercial solid waste and recycling hauler. Athens has two large volume transfer/processing facilities–also called materials recycling facilities (MRF)–one in City of Industry with a permitted throughput of 5,000 tons per day (tpd) and one in the community of Sun Valley with a permitted throughput of 1,500 tpd (CalRecycle 2021a, 2021b).

According to CalRecycle records for 2021 (the most recent year data is available), the City of South Pasadena has a per resident disposal rate target of 4.4 pounds per day (PPD) and the per employee disposal rate target of 15.8 PPD. The City achieved disposal rates of 3.6 PPD per capita and 14.2 PPD per employee (CalRecycle 2023a). Regarding waste disposal, in 2019 (the most recent year data is available) the City of South Pasadena disposed of approximately 21,482 tons of waste, which included 99 tons transformed to energy and 3,263 tons used as alternative daily cover (CalRecycle 2023c).

3.15.3 RELEVANT PROGRAMS AND REGULATIONS

Federal

Clean Water Act

The Clean Water Act is discussed in Section 4.8, Hydrology and Water Quality, of this EIR.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), *Health and Safety Code,* Sections 116350–116405) was passed in 1974 and is intended to protect public health by regulating the nation's public drinking water supply. The Federal SDWA authorizes the U.S. Environmental Protection Agency (USEPA) to set national standards for drinking water to protect against contaminants. Amendments in 1996 expanded the focus of the SDWA from primarily water treatment to enhanced source water protection, operator training, funding for water system improvements, and public information as important components of protecting drinking water supplies. The SWDA applies to every public water system in the United States and sets the enforceable maximum contaminant levels (MCLs) for drinking water supplies.

State

Safe Drinking Water Act

California enacted its own Safe Drinking Water Act, with the California Department of Health Services (DHS) granted primary enforcement responsibility. Title 22 of the *California Code of Regulations* (CCR) (Division 4, Chapter 15, "Domestic Water Quality and Monitoring Regulations") established DHS authority and provides drinking water quality and monitoring requirements, which are equal to or more stringent than federal standards.

Senate Bill 610 and Senate Bill 221

Senate Bill (SB) 610 amended State law[2] to improve the link between information on water supply availability and certain land use decisions made by cities and counties. Specifically, it requires land use planning entities (in this case, the City of South Pasadena), when evaluating certain large development projects, to request a water supply availability assessment from the water supply entity that would provide water to the project. A water supply assessment (WSA) must be prepared in conjunction with the land use approval process associated with a project, and it must include an evaluation of the sufficiency of the water supplies available to the water supplier to meet existing and anticipated future demands (including the demand associated with the project in question) over a 20-year horizon that includes normal, single-dry, and multiple dry-years. An SB 610 WSA is required for any "project" that is subject to CEQA and that proposes, among other things, residential development of more than 500 dwelling units.

In addition, SB 221 requires land use planning agencies, such as the City, to include (as a condition in any tentative map that includes a subdivision involving more than 500 dwelling units) a requirement to obtain written verification that sufficient water supplies are available for the subdivision from the applicable public water system, or, where there is no existing water supplier, from a consultant directed by the City. SB 221 also addresses the issue of land use and water supply, but at a different point in the planning process than does SB 610. SB 221 requires a city or county to deny approval of a tentative or parcel map if the city or county finds that the project does not have a sufficient, reliable water supply as defined in the bill.

A General Plan Update is not subject to either SB 610 or SB 221 because a General Plan, in itself, does not grant entitlements. However, these requirements may be applicable to future projects in the City.

Urban Water Management Planning Act

The Urban Water Management Planning Act (UWMP Act) (*California Water Code*, Division 6, Part 2.6, Section 10610 et seq.) was enacted in 1983. The UWMP Act applies to municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 afy of water. The UWMP Act requires these suppliers to update their Urban Water Management Plan (UWMP) every five years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple dry years.

[2] SB 610 amended section 21151.9 of the *California Public Resources Code*, and amended sections 10631, 10656, 10910, 10911, 10912, and 10915 of, repealed section 10913 of, and added and amended section 10657 of, the *California Water Code*.

Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (Assembly Bill 1881) requires cities and counties, including charter cities and charter counties, to adopt landscape water conservation ordinances by January 1, 2010. The Department of Water Resources (DWR) prepared an updated Model Water Efficient Landscape Ordinance (MWELO), as contained in *California Code of Regulations* Title 23, Division 2, Chapter 2.7. Cities and counties have the option to adopt DWR's ordinance or to develop their own. DWR's ordinance identifies the landscape documentation that needs to be submitted to the local agency, including a completed Water Efficient Landscape Worksheet that estimates total water use and compares it to the Maximum Applied Water Allowance (MAWA) based on the annual reference evapotranspiration value for the project area. The MAWA is considered the water budget and should not be exceeded by the estimated water use. Standards for soil management, landscape design, irrigation design and efficiency, grading design, irrigation scheduling, maintenance, audit and survey of water use, recycled water, storm water management, public education, and wastewater prevention are provided to reduce irrigation water demand.

Senate Bill 7

Senate Bill 7 (SBX7_7) was approved in November 2009 and requires urban water retail suppliers in California, which includes the City of South Pasadena, to reduce per capita water use by at least 10 percent on or before December 31, 2015 and achieve a 20 percent reduction by December 31, 2020. An urban retail water supplier must have included in its urban water management plan for the 2010 update, the baseline daily per capita water use, urban water use target, interim urban water use target, and compliance daily per capita water use, along with the bases for determining those estimates, including references to supporting data. Urban wholesale water suppliers shall include an assessment of their present and proposed future measures, programs, and policies to help achieve the water use reductions required by this bill.

Urban retail water suppliers and agricultural water suppliers would not be eligible for State water grants or loans for surface water or groundwater storage, recycling, desalination, water conservation, water supply reliability, and water supply augmentation unless they comply with the water conservation requirements established by this bill.

Title 24 Green Building Standards

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in greenhouse gas (GHG) emissions from buildings; (2) promote environmentally responsible, cost effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

AB 939 and California Solid Waste Reuse and Recycling Access Act of 1991

In 1989, the California legislature passed a bill (Assembly Bill [AB] 939), which requires jurisdictions to reduce the amount of solid waste disposed of in landfills by 50 percent by the year 2000 and thereafter. The purpose of AB 939 is to "reduce, recycle, and reuse solid wastes generated in the State to the maximum extent feasible" (State of California 2013).

Subsequent to AB 939, additional legislation was passed to assist local jurisdictions in accomplishing the required waste reduction goals. The California Solid Waste Reuse and Recycling Access Act of 1991 directs CalRecycle to draft a "model ordinance" relating to adequate areas for collecting and loading recyclable materials in development projects.

Solid Waste Disposal Measurement Act of 2008 (Senate Bill 1016)

The purpose of the Solid Waste Disposal Measurement Act of 2008 (Senate Bill [SB] 1016) is to make the process of goal measurement (as established by AB 939) simpler, timelier, and more accurate. SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment) and (2) its disposal as reported by disposal facilities.

Each year CalRecycle will calculate each jurisdiction's per capita (per resident or per employee) disposal rates; the per capita disposal rate will be used for most jurisdictions. Each year's disposal rate will be compared that jurisdiction's 50 percent per capita disposal target. As such, jurisdictions will not be compared to other jurisdictions or the statewide average, but they will only be compared to their own 50 percent per capita disposal target. Among other benefits, per capita disposal is an indicator that allows for jurisdiction growth because as residents or employees increase, report-year disposal tons can increase and still be consistent with the 50 percent per capita disposal target. A comparison of the reported annual per capita disposal rate to the 50 percent per capita disposal target will be useful for indicating progress, or other changes, over time.

75 Percent Initiative

In 2011, Governor Brown signed AB 341, which sets a goal of 75 percent recycling, composting, or source reduction of solid wastes by 2020. It also mandates commercial recycling by 2012. The 75 percent goal will shift the focus from local diversion to a Statewide approach that would decrease reliance on landfills. CalRecycle has been holding workshops with stakeholders since May 2012 to identify existing programs and new ways to reduce the waste streams. A number of programs will be implemented under this initiative, including continued local jurisdiction diversion; commercial recycling; mattress recovery; greenhouse gas reduction grant and loan program; commercial organics recycling; potential packaging reduction activities; and other new programs that are under development.

Mandatory Commercial Organics Recycling Bill (AB 1826)

In 2014, Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the State to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. The minimum threshold of organic waste generation by

businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

Mandatory Commercial Organics Recycling Bill (SB 1383)

In September 2016, Governor Brown signed SB 1383, establishing methane emissions reduction targets in a Statewide effort to reduce emissions of short-lived climate pollutants (SLCP) in various sectors of California's economy. Decomposition of organic waste in landfills is a significant source of greenhouse gas (GHG) emissions, particularly methane emissions, contributing to global climate change; and organic waste is the largest waste stream in California. Organic waste includes food, green material, landscape and pruning waste, organic textiles and carpets, lumber, wood, paper products, printing and writing paper, manure, biosolids, digestate, and sludges. SB 1383 established the following organic waste reduction targets: 75 percent reduction of organic waste disposal in landfills and 20 percent recovery of currently wasted edible food by 2025. This law complements and expands upon the goals of AB 341 (Mandatory Commercial Recycling) and AB 1826 (Mandatory Commercial Organics Recycling).

On January 1, 2022, SB 1383 regulations took effect and State enforcement of numerous responsibilities established for all California jurisdictions began. SB 1383 requires jurisdictions to (1) provide organics collection services to all residents and businesses, (2) establish an edible food recovery program, (3) conduct education and outreach, (4) procure recyclable and recovered organic products, (5) secure access to recycling and edible food recovery capacity, and (6) monitor compliance. Collection requirements are defined for residential and non-residential land uses, dependent on type, size, and other factors. Residents, employees, tenants, and customers are required to properly sort organic materials into the correct containers. Jurisdictions can select from a variety of organic waste collection services to match their unique communities and local infrastructure, while producing clean streams of organic feedstock that can be recycled into recycled products.

California Plumbing Code

Part 5 of the California Building Code (Title 24 of the Code of Regulations) is the California Plumbing Code, which provides standards for the design and construction of water and sewer systems, storm drains, and recycled water systems in buildings. It prohibits connection to a septic tank in areas served by a public sewer system and requires the proper abandonment of septic tanks, cesspools, and seepage pits.

Assembly Bill 602

AB 602 imposes additional standards and procedures for agencies adopting impact fees. It requires agencies to identify an existing level of services for public facilities and information supporting the agency's actions in increasing fees and requires agencies to impose fees on a housing development proportionately to the square footage of the development or make findings for a different methodology. Agencies must adopt studies at a public hearing with at least 30 days' notice, notify any member of the public who requests notice of an impact fee nexus study, and consider any evidence submitted by any member of the public that the agency's determinations or findings are insufficient. Large jurisdictions are required to adopt a capital improvement plan as part of the nexus study. Agencies must update nexus fee studies at least every eight years from the period beginning on January 1, 2022. Agencies must also post the current impact fee schedule and update at least twice a year. Finally, the law directs the California Department of Housing and Community Development (HCD) to create an impact fee nexus study template. The modification

or establishment of development impact fees in the City, that would apply to new development or redevelopment pursuant to the Project, would be developed in compliance with AB 602.

Regional

Sanitation Districts of Los Angeles County Wastewater Ordinance

In 1972, the Sanitation Districts of Los Angeles County (LACSD) adopted a Wastewater Ordinance, which was most recently amended in 1998, for the operation and financing of the LACSD's wastewater conveyance, treatment, and disposal facilities. The Wastewater Ordinance applies to all direct and indirect discharges of wastewater to any part of the sewerage system and regulates industrial wastewater discharges to protect the public sewerage system. The LACSD also charges Connection Fees and Surcharges. The Surcharge program requires all industrial companies discharging to the LACSD's sewerage system to pay their fair share of the wastewater treatment and disposal costs. The Connection Fee program requires all new users of the LACSD's sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. The LACSD uses the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated developments.

City

Urban Water Management Plan

The 2020 Urban Water Management Plan (UWMP) for the City of South Pasadena was prepared to meet the mandates of the California Urban Water Management Planning Act (South Pasadena 2021). The UWMP identifies historic and projected water supplies available to the City of South Pasadena; existing and projected water demand; available water rights; and programs to meet demand during an average year, single-dry year, and a five consecutive year drought. The UWMP is the foundational document for compliance with both the *California Water Code* and SB 610 and SB 221 documentation for applicable development projects in the City.

Municipal Code

Water Efficient Landscape

Sections 35.50 through 35.76 of the South Pasadena Municipal Code (SPMC) describes the City's landscape water conservation ordinance consistent with the requirements of DWR's Water Conservation in Landscaping Act of 2006, discussed above. The City's ordinance pertains to the planning, designing, installing, maintaining, and managing water efficient landscapes in new construction and rehabilitated projects. These requirements apply to new construction projects with an aggregate landscape area equal to or greater than 500 square feet requiring a building or landscape permit, plan check or design review; rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 square feet requiring a building or landscape permit, plan check, or design review; existing landscapes limited to those defined in Section 35.70 through 35.72 of the SPMC; and cemeteries (Section 35.51[a][4] of the SPMC).

Water and Sewer Impact Fee

Section 16B et. seq. of the SPMC defines water and sewer impact fees. The purpose of this impact fee is to mitigate unfavorable impacts on the City's water and sanitary sewer systems attributed to new development. This fee is to be applied toward the costs of new or expanded public water and

sewer facilities. It is based on a formula designed to ensure that individual developers pay their fair share for public facilities needed to serve the increased population which results from new development. All new development is required to pay this fee except for the following development: alterations that do not increase floor area; single-family residential additions that do not add habitable space; single-family residential units that are upsizing their meter, but not changing their use; and development exempt due to applicable State or federal laws. Water and sewer impact fees collected are directed into the Water and Sewer Impact Fee Fund; these funds are used only for water and sewer facilities improvements.

3.15.4 THRESHOLDS OF SIGNIFICANCE

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. A project would result in a significant adverse utilities and service systems impact if it would:

Threshold 3.15a: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;

Threshold 3.15b: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;

Threshold 3.15c: 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;

Threshold 3.15d: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or

Threshold 3.15e: Comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

3.15.5 PROPOSED POLICIES AND ACTIONS

General Plan Update

P1.5 Promote integration of Green Infrastructure into storm water management systems.

A1.5a Prepare a citywide Green Infrastructure Framework.

A1.5b Adopt storm water regulations that are more supportive of green infrastructure.

A1.5c Establish programs to promote the use of captured rainwater, gray water, or recycled water.

A1.5d Establish protocols for the transition of conventional gray infrastructure to multi-functional natural system Green Infrastructure.

A1.5e Develop simple, small, and low-cost demonstration green infrastructure projects both in the public and private realm.

A1.5f Review and revise development regulations to establish a green approach in new developments. Minimize impervious areas. Develop new projects and retrofit existing surfaces to reduce runoff through infiltration.

A15g Incorporate Green Street elements into repaving projects on a citywide basis.

A1.5h Establish programs to promote the use of green roofs, bio-swales, pervious materials for hardscape, and other stormwater management practices to reduce water pollution.

A1.5i Establish design standards for the City rights-of-way including street tree planting and design the incorporates filtration and water retention.

A1.5j Conduct demonstration and pilot projects, focusing on testing and developing green partnerships.

P3.12 Ensure continuity of critical services and ensure that adequate infrastructure is provided to accommodate new development by identifying capital improvements necessary to support long-term needs and responsibilities for funding and implementing improvements.

A3.12a Create a long-term plan to update infrastructure not only to accommodate growth, but also the effects of climate change.

A3.12b Implement provisions of the Water Management Plan for monitoring and adjusting rates of population growth to ensure amount of water needed or desired does not exceed available supplies.

A3.12c Create incentives and promote the installation of residential graywater systems that meet appropriate regulatory standards.

A3.12d Provide educational resources to encourage rainwater harvest.

A3.12e Implement provisions of the Water Management Plan requiring developers to pay for water, wastewater, and stormwater system upgrades beyond what is currently in place.

A3.12f Develop standards to increase the use of pervious pavers and other permeable materials on streets and in parking lots.

P3.15 Support reuse of discarded materials through waste prevention, recycling, and composting.

A3.15a Develop a Zero Waste Plan and supporting ordinances that incrementally lead the city to be a zero waste city.

A3.15b Require multi-family and commercial properties to have on site recycling containers and an organics composting program.

A3.15c Require construction sites to separate waste for proper diversion, and reuse or recycling.

Downtown Specific Plan Update

P1.2 Promote and require the integration of Green Infrastructure into storm water management systems.

A1.2a Review and revise development regulations to encourage a green approach in new developments. Minimize impervious areas. Develop new projects and retrofit existing surfaces to reduce runoff through infiltration.

A1.2b Incorporate Green Street elements into the redesign of Mission Street and Fair Oaks Avenue.

A1.2c Promote the use of green roofs, bio-swales, pervious materials for hardscape, and other stormwater management practices to reduce water pollution.

A1.2d Promote the use of captured rainwater, grey water, or recycled water.

P2.9 Explore un-tapped opportunities for value capture and revenue generation.

A2.9a Use developer agreements to support the City's public realm improvement goals.

A2.9b Fortify the City's existing Development Impact Fee regime.

P3.7 Ensure continuity of critical services.

A3.7 Require developers to pay their fair share for water, wastewater, and storm water system upgrades beyond what is currently in place to accommodate capacity needs created by growth.

2021–2029 Housing Element Implementation Programs

There are no Housing Element Implementation Programs goals or policies related to utilities and service systems.

3.15.6 ENVIRONMENTAL IMPACTS

Threshold 3.15a: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Threshold 3.15c: Would the Project 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?

Water Treatment Facilities

A comprehensive analysis of the overall system previously conducted identified a series of system-wide modifications required to improve the operation of the distribution system. As discussed above, in recent years the City has invested heavily in and embarked on an aggressive capital improvement and aging infrastructure replacement program. Improvements include the Grand, Wilson, and Garfield reservoirs reconstructions, water line replacements, and creation of a hydraulic modeling system of the entire water system to identify and address deficiencies on an ongoing basis. Replacement of the Graves Reservoir and pump station improvements has been completed, and replacement of the Westside Reservoir and pump station improvements is an upcoming capital improvement project.

However, even with the modifications implemented to date, water pressure within the downtown area averages about 45 pounds per square inch (psi) during peak use hours, with lower pressures occurring in the eastern portion. Water pressure of 50 to 70 psi is desirable. These pressures are low but unavoidable given the current water distribution system equipment and configuration. The City anticipates that future development may encounter problems associated with low water

pressures that can only be remedied on a system-wide basis. Some of the possible pressure and flow rate remedies identified include modifications to the lines entering and leaving the Grand and Garfield reservoirs; enlarging, replacing, or adding water lines, adding pumping stations, and increase usage of MWD water. Also, after implementation of some of the recommended system-wide improvements, all new development may require on-site pumps for two- or three-story buildings. The City's IWWRMP, which is under development, will identify other water distribution system issues including low pressure areas and provide recommendations for resolution.

Water infrastructure improvements would be directly related to the pace of development, and the policies and actions of the General Plan Update (which is inclusive of infrastructure-related issues within the DTSP) have been designed to address this. The Our Planned Community chapter requires the City to create a long-term plan to update infrastructure to not only accommodate growing population/businesses, but also the effects of climate change. This would include upgrading the water system to provide proper pressure throughout the City. This General Plan Update chapter also requires the City to adopt an ordinance that requires on-site non-potable water systems for all development, and to adopt zero net water building codes. These requirements would reduce the demand for water, and therefore the demands on the water distribution system. Finally, consistent with Section 16B of the SPMC, this chapter includes an action to require Applicants/Developers of future development projects to pay fair share Water and Sewer Impact Fees for improvements to the water distribution and sanitary sewer systems. The purpose of this fee is to mitigate unfavorable impacts on the City's water and sewer systems attributed to new development, and the fees collected are applied toward the costs of new or expanded public water and sewer facilities.

As part of the City's plan review process, the Public Works Department conducts a review of wet utility (i.e., water and wastewater) infrastructure needs. The South Pasadena Fire Department also reviews development plans to determine fire safety requirements are met, including provision of fire flows and pressures. The Applicant/Developer of future development projects would be responsible for installing all new or replacement water-related infrastructure on the property and within the proposed structure(s) deemed required by the City and remitting the water impact fee calculated by the City for that project. The City would be responsible for continuing to manage the Water and Sewer Impact Fee Fund and implement the necessary improvements to the water distribution system.

In summary, new or expanded water infrastructure may be necessary to serve future development projects. The need for, and environmental impacts of, additional water distribution infrastructure would be addressed in the required project-level California Environmental Quality Act (CEQA) review. If significant impacts associated with installation of the necessary infrastructure are identified, mitigation measures would be required. Through compliance with the City's plan review processes; application of the Water and Sewer Impact Fee (Section 16B of the SPMC); implementation of applicable General Plan Update policies and actions (which are inclusive of infrastructure-related issues within the DTSP); and identification of and, if necessary, mitigation for, environmental impacts associated with new or expanded water distribution infrastructure, there would be a less than significant impact and no mitigation is required.

Wastewater Treatment Facilities

All sewage treatment/wastewater reclamation plants are subject to the water quality discharge requirements of the applicable National Pollution Discharge Elimination System (NPDES) permit. The City is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB) and is subject to the waste discharge requirements of the Los Angeles County MS4

Permit (Order No. R4-2012-0175). Future development pursuant to the General Plan Update would increase wastewater flows on City sewer lines, on LACSD trunk sewer lines, and at the WRPs. Any sewer discharges that would cause a receiving WRP to exceed applicable NPDES requirements for discharges into MS4 facilities would result in a potentially significant impact.

Residential wastewater does not require levels of treatment that would exceed LARWQCB NPDES treatment requirements; however, some industrial, manufacturing, and/or commercial uses may generate wastewater requiring additional treatment. In compliance with the LACSD's Wastewater Ordinance, all wastewater discharges into LACSD facilities shall be required to comply with the discharges standards set forth to protect the public sewerage system. The LACSD Surcharge program requires all industrial companies discharging to the LACSD sewerage system to pay their fair share of the wastewater treatment and disposal costs, and the Connection Fee program requires all new users of the LACSD sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. Therefore, compliance with LACSD's Wastewater Ordinance by all Applicants/Developments of future development projects would ensure potential impacts related to wastewater treatment requirements would be less than significant.

Based on the wastewater loadings published by the LACSD and provided with their RNOP comment letter, it can conservatively be estimated that buildout of the Project could generate approximately 662,329 gpd, or 0.66 mgd. This volume of additional wastewater generation could be fully accommodated by either the Whittier Narrows or Los Coyotes WRPs. Specifically, this wastewater generation would represent approximately 13.0 percent of the Whittier Narrows WRP's remaining capacity of 5.1 mgd, and approximately 4.1 percent of the Los Coyotes WRP's remaining capacity of 16.2 mgd (based on LACSD's RNOP comment letter). Therefore, implementation of the proposed General Plan and DTSP Update 2021–2029 Housing Element Implementation Programs would not result in the need for new or expanded wastewater treatment facilities or a determination by the LACSD that there would be inadequate capacity in addition to existing commitments. Also, consistent with the Connection Fee program of LACSD's Wastewater Ordinance, all new users of the LACSD sewerage system must pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities.

Regarding the City's sewer system, similar to the analysis of the water distribution system above, the City has recently completed a large sewer system improvement program. Any additional improvements to the sewer system would be directly related to the pace of development and the policies and actions of the General Plan Update (which is inclusive of infrastructure-related issues within the DTSP) have been designed to address this.

The Our Planned Community chapter requires the City to create a long-term plan to update infrastructure to not only accommodate growing population/businesses, but also the effects of climate change. This General Plan Update chapter also requires the City to adopt zero net water building codes, which would also reduce wastewater generation. Finally, consistent with Section 16B of the SPMC, this chapter includes an action to require Applicants/Developers of future development projects to pay fair share Water and Sewer Impact Fees for improvements to the water distribution and sanitary sewer systems. The purpose of this fee is to mitigate unfavorable impacts on the City's water and sewer systems attributed to new development, and the fees collected are applied toward the costs of new or expanded public water and sewer facilities.

As part of the City's plan review process, the Public Works Department conducts a review of wet utility (i.e., water and wastewater) infrastructure needs. The Applicant/Developer of future

development projects would be responsible for installing all new or replacement sewer-related infrastructure on the property and within the proposed structure(s) deemed required by the City and remitting the sewer impact fee calculated by the City for that project. The City would be responsible for continuing to manage the Water and Sewer Impact Fee Fund and implement the necessary improvements to the sanitary sewer system.

In summary, new or expanded wastewater infrastructure may be necessary to serve future development projects. The need for, and environmental impacts of, additional wastewater infrastructure would be addressed in the required project-level CEQA review. If significant impacts associated with installation of the necessary infrastructure are identified, mitigation measures would be required. Through compliance with the City's plan review processes; application of the Water and Sewer Impact Fee (Section 16B of the SPMC); implementation of applicable General Plan Update policies and actions; and identification of and, if necessary, mitigation for, environmental impacts associated with new or expanded wastewater infrastructure, there would be a less than significant impact and no mitigation is required.

Stormwater Drainage Facilities

Changes in drainage patterns would be confined to individual development sites and would not affect major underground storm drain lines and concrete-lined drainages in the City. Most development sites pursuant to the proposed Project would be redevelopment of existing, fully developed sites, the change in drainage patterns on these sites would be nominal. All development must be conducted in compliance with applicable State and local regulations, which prevent substantial alteration of site drainage patterns by controlling the volume and direction of runoff. Since drainages in the City are concrete-lined, no alteration in the alignment of these channels would occur from future development. Impacts would be less than significant, and no mitigation is required.

Dry Utilities (Electrical, Natural Gas, and Telecommunications)

Southern California Edison (SCE) provides electrical services and Southern California Gas (The Gas Company) provides natural gas services in the City. South Pasadena uses the Clean Power Alliance (CPA) for electricity generation at the 100 percent renewable level, wherein the City purchases electricity from the CPA but uses the physical plant and billing processes of SCE. Telecommunications (i.e., telephone, television, and/or internet) services are provided by several companies, including, but not limited to, Spectrum, AT&T, and EarthLink. There is a backbone of dry utility infrastructure throughout the City. Electric and natural gas services are regulated by the California Public Utilities Commission (CPUC), which requires that these utilities provide services as required by the public. Telecommunications services are provided on demand in a free market system. The need for new, expanded, and/or relocation dry utilities would be determined as part of future individual projects and dependent on the conditions at each project site. The environmental impacts (e.g., air quality and noise) of constructing these facilities is within the range of assumptions applied to the analysis in this PEIR. Impacts would be less than significant, and no mitigation is required.

Threshold 3.15b: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Future development pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would generate a demand for water that will require increased

pumping of groundwater resources and imported water use. The City's sources of water supply are groundwater from the Main San Gabriel Groundwater Basin, treated imported water from MWD's USG-2, and purchased water from the City of Pasadena. As discussed, the collective capacity from the City's active wells is currently about 4,960 gpm or about 7.1 mgd. By 2045, the collective capacity from all wells will be 4,500 gpm or about 6.5 mgd. Assuming the City wells were limited to 75 percent of capacity during calendar years 2020 through 2045, the available pumping capacity is about 5.3 mgd (about 5,900 af) in 2020 and about 4.9 mgd (about 5,500 af) in 2045. USG-2 has a capacity of 6.5 mgd. This equates to a total City water supply of 11.8 mgd in 2020 and 11.4 mgd in 2045 (South Pasadena 2021). The following water supply analysis is based primarily on the City's 2020 UWMP as well as review by the City Public Works Department staff.

Based on the 2020 water demand factor of 124 gallons per capita per day (gpcd) from the City's 2020 UWMP, the total estimated water demand for the additional population (assuming no residential vacancies) is calculated to be 2.62 af (0.85 mgd). The actual water demand in fiscal year 2019-2020 was 3,546 af; therefore, the additional population of the Project would result in a total average day water demand of about 3,549 af. It is anticipated the City will be able to meet its average day demand in 2045 with its total water supply of 4,163 af (South Pasadena 2021). While the Project would accommodate non-residential growth and additional landscaping, residential growth would be the source of most additional water demand and therefore is used for analysis purposes only to determine whether projected growth could reasonably be expected to have adequate water supplies. Water supply sufficiency would be assessed on a project-by-project basis based on State and other regulations in place at that time and the City's current UWMP. The City has historically met all its water demands with groundwater production, treated imported water from MWD, and purchased water from the City of Pasadena. Even with the City's historically reliable water supply, the City included a Water Conservation and Supply Shortage Plans and Enforcement (Ordinance No. 2268) in its 2020 UWMP identifying actions to be taken to respond to a severe or extended water shortage. If water supplies are temporarily insufficient to meet customer demand, the City may implement its Water Conservation and Supply Shortage Plans and Enforcement (Ordinance No. 2268).

Tables 3.15-1, South Pasadena Projected Water Demands and Supplies in 2025 (AFY), and 3.15-2, South Pasadena Projected Water Demands and Supplies in 2045 (AFY), show that the combined capacities from the City's sources of supply would provide sufficient water supply for the City under all conditions from 2025 to 2045 (South Pasadena 2021).

TABLE 3.15-1
SOUTH PASADENA PROJECTED WATER DEMANDS AND SUPPLIES IN 2025 (AFY)

	Average/Normal Water Year	Single Dry Water Year	Five Consecutive Year Drought				
			Year 1	Year 2	Year 3	Year 4	Year 5
Total Demand[a]	4,035	4,299	5,059	5,199	5,202	4,406	3,775
Supplies[b]							
Main San Gabriel Basin[c]	3,865	4,129	4,889	5,029	5,032	4,236	3,605
MWD USG-2 Supply	150	150	150	150	150	150	150
City of Pasadena	20	20	20	20	20	20	20
Total Supply	4,035	4,299	5,059	5,199	5,202	4,406	3,775
Surplus/Deficiency	*0*	*0*	*0*	*0*	*0*	*0*	*0*

AFY: acre-feet per year

[a] Single dry and five consecutive year drought demands are based on the proportions of average water demand to single dry year and five consecutive year drought water demands, identified in Chapter 7 of City of South Pasadena's 2020 UWMP.
[b] Based on proportion of supplies from City of South Pasadena's 2020 UWMP
[c] The reliable total pumping capacities of City of South Pasadena's Main San Gabriel Basin groundwater wells is estimated to be about 5,900 AFY (75% well operating factor)
Source: South Pasadena 2021

TABLE 3.15-2
SOUTH PASADENA PROJECTED WATER DEMANDS AND SUPPLIES IN 2045 (AFY)

	Average/Normal Water Year	Single Dry Water Year	Five Consecutive Year Drought				
			Year 1	Year 2	Year 3	Year 4	Year 5
Total Demand[a]	4,163	4,435	5,219	5,364	5,367	4,545	3,894
Supplies[b]							
Main San Gabriel Basin[c]	3,993	4,265	5,049	5,194	5,197	4,375	3,724
MWD USG-2 Supply	150	150	150	150	150	150	150
City of Pasadena	20	20	20	20	20	20	20
Total Supply	4,163	4,435	5,219	5,364	5,367	4,545	3,894
Surplus/Deficiency	*0*	*0*	*0*	*0*	*0*	*0*	*0*

AFY: acre-feet per year

[a] Single dry and five consecutive year drought demands are based on the proportions of average water demand to single dry year and five consecutive year drought water demands, identified in Chapter 7 of City of South Pasadena's 2020 UWMP.
[b] Based on proportion of supplies from City of South Pasadena's 2020 UWMP
[c] The reliable total pumping capacities of City of South Pasadena's Main San Gabriel Basin groundwater wells is estimated to be about 5,500 AFY (75% well operating factor)

Source: South Pasadena 2021

It is noted the City can increase production from the Basin in accordance with the Main San Gabriel Basin Judgment, even during periods of drought to meet its demands. Groundwater pumping limitations have never been applied to groundwater producers with rights in the Main San Gabriel Basin. This is because in addition to the City's groundwater extraction from the Main San Gabriel Basin, the City has the ability to obtain supplemental water supplies from its Main San Gabriel Basin cyclic storage account. Under the Main San Gabriel Basin, cyclic storage provisions allow producers, including the City, to store supplemental water within the Main San Gabriel Basin for the purpose of supplying replacement water. As discussed previously, the City and other producers have a total balance of approximately 60,044 af in cyclic storage accounts as of April 2021.

Active and effective groundwater management enables water producers in the Basin to historically meet water demands, including during single and multiple dry years. Based on the demonstrated reliability of water resources available to the City, including the City's access to the Basin water supplies, including imported replacement water and the City's access to treated imported water from MWD and purchased water from the City of Pasadena, the City has sufficient and reliable water supplies to meet its future demands from 2020 to 2045, including during single and five consecutive year droughts (South Pasadena 2021). There would be adequate water supplies to support buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs from existing entitlements and resources. There would be a less than significant impact, and no mitigation is required.

Threshold 3.15d: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Threshold 3.15e: Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

As the City is served by a private waste hauler, the City's waste can be disposed, after sorting and recycling at one of Athens MRFs, at any landfill with capacity that can accept the municipal waste. Review of CalRecycle documents show that in 2019 (the most recent data available) City-generated municipal waste of approximately 21,482 tons was disposed at landfills, transformation facilities, and used for alternative daily cover (CalRecycle 2023c).

Based on the 2021 reporting year disposal rate targets (4.4 PPD per capita and 15.8 PPD per employee) (CalRecycle 2023a), at buildout of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs the estimated 6,882 residents would generate approximately 30,281 PPD of solid waste, or approximately 5,526 tons per year[3]. The estimated 1,978 employees would generate approximately 31,252 PPD of solid waste, or approximately 5,704 tons per year[4]. This equates to approximately 11,230 tons per year (approximately 30.8 tons per day) of additional solid waste requiring disposal in 2040, assuming full buildout of the Project. Compared to the 2019 solid waste disposal after application of source reduction and recycling efforts, this would represent an approximate 52 percent increase municipal solid waste generation requiring disposal. It is noted that these figures are for analysis purposes only, as they assume no additional source reduction programs would be enacted by the City or that additional sorting and/or transformation technologies would not be developed to further reduce the waste stream, which is unlikely. It is also noted that these figures assume population growth with no residential vacancies, which is also unlikely.

3 (30,281 PPD * 365 days)/2,000 pounds per ton = 5,526 tons per year
4 (31,252 PPD * 365 days)/2,000 pounds per ton = 5,704 tons per year

As of December 2020, (the most data available), the County's 10 municipal landfills have a permitted daily capacity of 27,765 tons and an estimated remaining permitted capacity of 142.67 million tons, with remaining life estimates of between 9 and 35 years (LACPW 2021). The City's estimated daily solid waste increase requiring disposal (approximately 30.8 tons) represents approximately 0.11 percent of the County landfill's daily capacity and the annual solid waste increase (approximately 11,230 tons) approximately 0.01 percent of the remaining permitted capacity. As such, it is not anticipated that the City's additional waste stream would exceed the capacity of these landfills. Also, in addition to in-County landfills, Athens can dispose of any available landfill at the time of disposal, including those out-of-County.

The City is currently exceeding its CalRecycle-defined per capita and per employee disposal rates. The City will continue to implement a variety of solid waste reduction, recycling, and re-use measures to continue to meet its obligation under AB 939, and to meet upcoming obligations under AB 341 and AB 1826. Our Well Planned Community chapter of the General Plan Update includes policies and actions to facilitate waste prevention, recycling, and composting. These including requiring the City to develop a Zero Waste Plan, requiring multi-family and commercial properties to have on-site recycling containers as well an organics recycling program, requiring construction sites to separate waste for proper diversion, and reuse or recycling, where feasible. Therefore, there would be less than significant impacts related to landfill capacity and solid waste regulations, and no mitigation is required.

3.15.7 CUMULATIVE IMPACTS

As discussed further in Section 2.5, Approach to Cumulative Impact Analysis, the cumulative impact analysis contained in this PEIR uses the method that focuses on regional projections, assuming future growth and development reflects these projections. The geographic context for the cumulative impact analysis, unless otherwise noted, is the San Gabriel Valley.

Growth and development within the San Gabriel Valley would generate increased demand for utility services from various service agencies. While increases in utility demands would occur on agencies that do not serve the City, future development pursuant to the proposed General Plan and DTSP Update, 2021–2029 Housing Element Implementation Programs, and related public and infrastructure projects would not add to the service demands of these outside agencies. At the same time, cumulative impacts on regional utility providers would account for growth and development within the larger region, rather than just the San Gabriel Valley. Thus, the cumulative analysis for impacts on utility services considers the service area of the respective providers and adjacent service agencies, as they may be affected by services to be provided within the City.

Water Supply

As discussed above, water services in the City are provided by the City. The primary water supply source now and through 2045 is the Main San Gabriel Groundwater Basin. The City's 2020 UWMP considered the reliability of the Basin and imported water supplies, based on anticipated growth in entitlements and/or demands on these resources, during average, single dry, and five consecutive year droughts. The 2020 UWMP concluded the Basin and other water sources would reliably provide water demand under all conditions with Project build-out.

Water and Wastewater Infrastructure

The cumulative service area for both water distribution and wastewater conveyance infrastructure is the City of South Pasadena. As such, the analysis presented above is also the cumulative impact analysis. As discussed, future development projects would be required to evaluate the effects on

the City's infrastructure system, as well as identify environmental impacts of and mitigation measures for installation of any necessary infrastructure. As discussed above, through compliance with the City's plan review processes; application of the Water and Sewer Impact Fee (Section 16B of the SPMC); implementation of applicable General Plan Update policies and actions, and project-level CEQA analyses, there would be a less than significant impacts related to the need for new or expanded water distribution and wastewater conveyance infrastructure, and no mitigation is required. Accordingly, there would not be a cumulative impact related to water and wastewater infrastructure.

Wastewater Treatment

Cumulative impacts on trunk sewer lines and wastewater treatment would occur within the service area of the LACSD. Future growth and development in the region would generate additional wastewater that would require conveyance and treatment at the WRPs of the LACSD, including the Whittier Narrows and Los Coyotes WRPs. These two WRPs have a combined remaining capacity of 21.3 mgd. Of this, the conservative, hypothetical wastewater generation estimated for the City's buildout represents approximately 13.0 percent of the Whittier Narrows WRP's remaining capacity and approximately 4.1 percent of the Los Coyotes WRP's remaining capacity, as discussed previously. Also, all future development projects in the LACSD's service area would be subject to the LACSD's Wastewater Ordinance, which includes the Connection Fee program. The Connection Fee program requires all new users of the LACSD's sewerage system, as well as existing users that significantly increase the quantity or strength of their wastewater discharge, to pay their fair share of the costs for providing additional conveyance, treatment, and disposal facilities. The LACSD uses the fees for the expansion and improvement of their facilities, as needed, to serve existing and anticipated developments. Based on continued implementation of the LACSD Wastewater Ordinance and the nominal contribution of additional wastewater flows to the LACSD system, the proposed Project would not contribute to a cumulatively considerable impact to LACSD facilities.

Solid Waste

Solid waste collection services are provided on demand by private haulers, and cumulative impacts on their services from future development pursuant to the General Plan and DTSP Update, public and infrastructure projects in the City, and growth and development within the San Gabriel Valley are not expected to result in adverse impacts on solid waste collection services. Available landfill capacity is expected to decrease over time with future growth and development in the San Gabriel Valley. Existing and future waste reduction and recycling programs and regulations are expected to reduce this demand and extend the life of existing landfills. Also, CalRecycle is responsible for administering and monitoring State solid waste reduction initiatives, and individual jurisdiction's ability to meet these requirements. It is assumed that CalRecycle's role would continue in the future. Based on the available capacity of landfills in the region and the nominal contribution of additional solid waste requiring disposal, approximately 0.11 percent of the County landfill's remaining daily permitted capacity, the proposed Project would not contribute to a cumulatively considerable impact to landfill capacity or solid waste regulations.

Dry Utilities

Natural gas is provided on demand from CPUC-regulated utilities (i.e., The Gas Company) and from free-market providers (e.g., AT&T and Spectrum). The CPA, discussed further above, is a community choice aggregate utility is also not regulated by the CPUC. The respective service areas for these utility providers are large and all cover at least substantial portions of California.

Because these utilities are provided on demand, including CPUC-regulated and community choice aggregate utilities, the expansion of services based on regional growth is part of each providers business strategy. Therefore, growth and development within the San Gabriel Valley are not expected to result in adverse impacts on dry utilities. The proposed Project would not contribute to a cumulatively considerable impact related to the need for new or expanded dry utilities.

3.15.8 MITIGATION MEASURES

No significant impacts related to utilities and service systems have been identified with implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs. Therefore, no mitigation is required.

3.15.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant impacts at both a program and cumulative level.

3.15.10 REFERENCES

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3.16 WILDFIRE

3.16.1 METHODOLOGY

This section describes the existing wildfire hazards in the City of South Pasadena (City) and the potential to exacerbate wildfire risks with future development projects under the proposed General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs.

3.16.2 EXISTING CONDITIONS

Wildfire Hazards in the City of South Pasadena

Wildfires can potentially occur where developments are adjacent to open space or proximate to wildland fuels such as grass, leaf litter, trees, or shrubs that can ignite when exposed to a natural occurrence (i.e., lightning) or by an unplanned, unauthorized, and/or accidental human-caused activity. Wildfires may originate in undeveloped areas and spread to developed or urban areas where landscape and structures are not designed and maintained to be fire-resistant.

High Risk Areas (South Pasadena Municipal Code)

Section 14.1 et. seq. of the City of South Pasadena Municipal Code (SPMC) designates as a High Risk Fire Area "as those properties located south of Monterey Road, extending to the city border, and west of Meridian Avenue, extending to the city border." Exhibit 3.16-1, Wildfire Hazards Areas, illustrates the location of the City's designated High Risk Fire Area. The requirements for construction in this area are described below in Section 3.16.3, Relevant Programs and Regulations.

Fire Hazard Severity Zones (California Department of Forestry and Fire Protection)

The California Department of Forestry and Fire Protection (CAL FIRE) is mandated by Section 4201-4204 of the Public Resources Code and Section 51175-51189 of the Government Code to identify Fire Hazard Severity Zones in the State. These are areas of significant fire hazard based on fuels, terrain, weather, and other relevant factors where the State has financial responsibility for wildland fire protection. These areas are also known as State Responsibility Areas (SRAs). Areas where local fire protection agencies are responsible for wildfire protection are classified as Local Responsibility Areas (LRAs). These classifications influence where development occurs and how a city will respond to future wildfire emergencies.

CAL FIRE has not designated any lands within the City of South Pasadena as High Fire Hazard Severity Zones. However, lands abutting the western and southwestern boundaries of the City are identified as within a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2023). Most of these lands are in the City of Los Angeles, and a small portion is in the City of Pasadena (see Exhibit 3.16-1). Those VHFHSZs are in LRA; thus, the cities of Los Angeles and Pasadena are responsible for the costs of wildfire suppression in those areas.

Historic Wildfires in the City

Based on the most recent data, CAL FIRE reports one historic wildfire is mapped as within the City, a 1974 fire in the Monterey Hills area that burned 4.4 acres. Additionally, the edge of a 1957 wildfire that burned 170 acres in the City of Los Angeles immediately to the west-southwest, slightly encroached on the City's lands near what is now Oak Hill Place (CAL FIRE 2023). The

City has experienced small brush fires that are managed by local agencies as well, but these are not tracked as wildfires by CAL FIRE.

Firefighting Resources

As discussed further in Section 3.13, Public Services and Recreation, the South Pasadena Fire Department (SPFD) provides fire protection and emergency medical services in the City. The SPFD is a full-service fire department that provides fire/rescue services, paramedics, safety education, inspections, plan reviews, and emergency management. The SPFD is also an all risk emergency services agency, as SPFD personnel are trained to handle responses such as structure, wildland and vehicle fires, hazardous materials releases, rescues and service calls, and provide advanced life support and medical transport. There is one fire station in the City, located at 817 Mound Avenue, that houses an engine company (Engine 81), a rescue ambulance, and a light and air unit.

A mutual aid agreement is an agreement in which participating agencies guarantee the provision of available resources to a requesting agency in the event of an emergency. An automatic aid agreement provides services without regard for service boundaries but based on earliest response. The SPFD has automatic aid agreements with the twelve other agencies[1] affiliated with the Verdugo Fire Communications Center (VFCC), all of whom operate under the Unified Response agreement. The SPFD also participates in the State of California Master Mutual Aid program, which is used when all available local resources have been depleted or committed to an incident, allowing the State to coordinate resources available from neighboring counties, as necessary.

3.16.3 RELEVANT PROGRAMS AND REGULATIONS

State

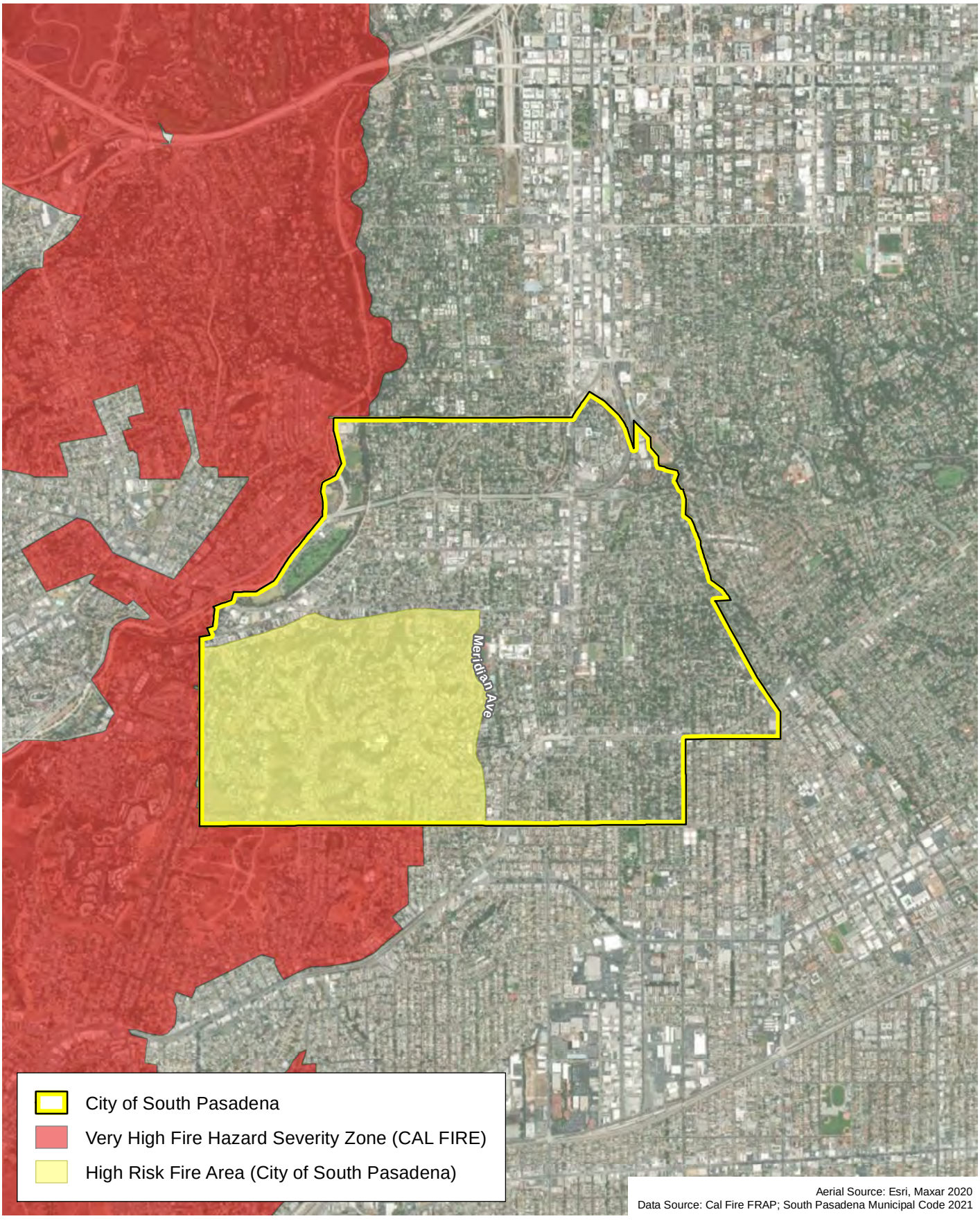
CAL FIRE

CAL FIRE's Fire Prevention Program consists of various activities including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement. Common projects include fire break construction and other fire fuel reduction activities that lessen the risk of wildfire to communities. These activities include brush clearance around communities, along roadways and evacuation routes. Other important activities include defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping (discussed above), preparation and implementation of the State's fire plan, fire-related law enforcement activities such as investigations to determine fire cause and origin as well as arson cases, and support for local government fire safe planning in the SRA.

California Fire Plan

In a collaborative effort between the State Board of Forestry and the California Department of Forestry and Fire Protection, the *2018 Strategic Fire Plan for California* (Fire Plan) was prepared to address the protection of lives and property from California wildfires while recognizing that wildfires are a natural phenomenon and can have beneficial effects, particularly on ecosystem health. The Fire Plan is a comprehensive update to the 2010 Strategic Fire Plan for *California*.

[1] The VFCC currently includes the cities of Alhambra, Arcadia, Burbank, Glendale, Monrovia, Montebello, Monterey Park, Pasadena, San Gabriel, San Marino, Sierra Madre, South Pasadena, and the Bob Hope Airport Fire Department.



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Wildfire Hazard Areas

Exhibit 3.16-1

General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element Implementation Programs

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The overarching vision of the Fire Plan is to have "A vision for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of and responsive to the benefits and threats of wildland fire; all achieved through local, state, federal, tribal, and private partnerships". This vision is supported by eight goals and related objectives, and the application of adaptive management as a fundamental strategy of Fire Plan implementation to provide flexibility and allow for changing internal and external conditions (CAL FIRE 2018).

Fire Hazard Severity Zone Mapping

CAL FIRE prepares Fire Hazard Severity Zone maps for SRA and LRA considering many factors such as fire history, existing and potential fuel (natural vegetation), flame length, blowing embers, terrain, and typical weather for the area. The CAL FIRE Director evaluates fire hazard severity in LRA and makes a recommendation to the local jurisdiction where VHFHSZs exist. The Government Code then provides direction for the local jurisdiction to take appropriate action.

Section 4291 of the Public Resources Code

In January 2005, a new State law became effective that extended the defensible space clearance around homes and structures from 30 feet to 100 feet. Proper clearance to 100 feet dramatically increases the chance of a house surviving a wildfire. This defensible space also provides for firefighter safety when protecting homes during a wildland fire. This State law is promulgated in Section 4291 et. seq. of the Public Resources Code, which CAL FIRE is responsible for enforcing.

Section 4291(a)(1) of the Public Resources Code states that "A person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material, shall at all times do all of the following:

> (1) (A) Maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line, except as provided in subparagraph (B). The amount of fuel modification necessary shall consider the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained and spaced in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. This subparagraph does not apply to single specimens of trees or other vegetation that are well-pruned and maintained so as to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation or to interrupt the advance of embers toward a structure. The intensity of fuels management may vary within the 100-foot perimeter of the structure, with more intense fuel reductions being utilized between 5 and 30 feet around the structure, and an ember-resistant zone being required within 5 feet of the structure, based on regulations promulgated by the board, in consultation with the department, to consider the elimination of materials in the ember-resistant zone that would likely be ignited by embers. Consistent with fuels management objectives, steps should be taken to minimize erosion, soil disturbance, and the spread of flammable nonnative grasses and weeds. For purposes of this subparagraph, "fuel" means any combustible material, including petroleum-based products, cultivated landscape plants, grasses, and weeds, and wildland vegetation.

(B) A greater distance than that required under subparagraph (A) may be required by state law, local ordinance, rule, or regulation. Fuel modification beyond the property line may only be required by state law, local ordinance, rule, or regulation in order to maintain 100 feet of defensible space from a structure. Fuel modification on adjacent property shall only be conducted following written consent by the adjacent landowner. Any local ordinance related to fuel modification shall be in compliance with all applicable state laws, regulations, and policies. Any local ordinance may include provisions to allocate costs for any fuel modification beyond the property line.

(C) An insurance company that insures an occupied dwelling or occupied structure may require a greater distance than that required under subparagraph (A) if a fire expert, designated by the director, provides findings that the fuel modification is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. The greater distance may not be beyond the property line unless allowed by state law, local ordinance, rule, or regulation.

California Disaster and Civil Defense Master Mutual Aid Agreement

The California Disaster and Civil Defense Master Mutual Aid Agreement is an agreement between the State of California, its various departments and agencies, and the various political subdivisions, municipal corporations, and other public agencies of the State of California. The agreement allows for the use of all the resources and facilities of the participating agencies in preventing and combating the effect of disasters, such as flood, fire, earthquake, pestilence, war, sabotage, and riot. It commits the participating agencies to voluntarily aid and assist each other in the event of a disaster, through the interchange of services and facilities, including fire, police, medical and health, communication, and transportation services and facilities, as necessary, to provide rescue, relief, evacuation, rehabilitation, and reconstruction.

California Fire Code

The 2022 California Fire Code (Title 24, Part 9 of the California Code of Regulations), effective January 1, 2023, is based on the 2021 International Fire Code. Typical fire safety requirements of the California Fire Code include requirements for the installation of fire sprinkler; building materials and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. In addition, the California Fire Code addresses fire flow requirements, fire hydrant spacing, and access road specifications. Specific California Fire Code fire safety regulations have been incorporated by reference in both the County of Los Angeles Code and the SPMC with local amendments.

Chapter 7A of the California Building Code (CBC) focuses primarily on preventing ember penetration into homes, a leading cause of structure loss from wildfires. These codes have been developed through decades of fire structure “save” and “loss” evaluations to determine what causes buildings to ignite or how to avoid ignition during wildfires. The resulting fire codes now focus on mitigating former structural vulnerabilities through construction techniques and materials so that the buildings are resistant to ignitions from direct flames, heat, and embers.

SECTION 4.0 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines addresses the discussion of alternatives in an Environmental Impact Report (EIR). Key provisions of the State CEQA Guidelines are identified throughout this section to explain the basis for the alternatives evaluation in this Program EIR (PEIR). Section 15126.6(a) states:

> An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

4.1.1 PROJECT SUMMARY

Pursuant to State law, the City of South Pasadena (City) has an approved General Plan. The *South Pasadena General Plan* was last updated and adopted by the City in 1998, except for the 2021-2029 Housing Element adopted on May 30, 2023. Similarly, the City has an approved Specific Plan for a portion of the downtown area. The Mission Street Specific Plan (MSSP; now expanded to include a segment of Fair Oaks Avenue and referred to as the Downtown Specific Plan [DTSP]) was adopted in 1996. State law does not require a General Plan to be updated in regularly scheduled intervals, except for the Housing Element, which must be updated every five to eight years. However, a general plan needs to be updated if it is to reflect community values and priorities as they change over time. With the recent adoption of the 2021-2029 Housing Element, the City's current General Plan is not internally consistent and must be updated.

Accordingly, the comprehensive General Plan and Downtown Specific Plan (DTSP) Update is being undertaken by the City at this time to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live; reflect an understanding of current community goals; address continued growth pressures in the San Gabriel Valley and the demand for more diverse mobility and housing choices as set forth in the recently adopted Housing Element; and respond to evolving regional and environmental issues. The General Plan and DTSP Update serve as long-term (through 2040) policy guides for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City.

The General Plan and DTSP Update each include nine chapters, and each of the chapters features an overriding goal with policies and actions that support the goal. The nine chapters are: Our Natural Community; Our Prosperous Community; Our Well Planned Community; Our Accessible Community; Our Resilient Community; Our Healthy Community; Our Safe Community; Our Active Community; and Our Creative Community. These nine chapters and their content (i.e., goal, policies, actions), reflect the public visioning process. Policies and actions that support each goal also provide guidance for the City's ongoing operations, daily actions, decision-making

activities, maintenance activities, regulation enforcement, monitoring, services provision, and other governmental activities.

The housing element is one of the State-mandated elements of a General Plan. It identifies the City's housing conditions, needs, and opportunities and establishes the goals, policies, and actions (programs) that are the foundation of the City's housing strategy. However, unlike all other General Plan elements, State law requires each municipality to update its housing element on a prescribed schedule (most commonly every eight years). Housing needs are determined by the California Housing and Community Development Department (HCD), which allocates numerical housing targets to the Metropolitan Planning Organizations (MPOs), including the Southern California Association of Governments (SCAG), which includes the City of South Pasadena. SCAG finalized its Regional Housing Needs Assessment (RHNA), on March 9, 2021, and has allocated 2,067 dwelling units (DUs) to the City of South Pasadena. Additionally, HCD has recommended the 2021–2029 Housing Element Implementation Programs to demonstrate capacity for a surplus of units beyond the RHNA allocation.

As discussed further in Section 2.3.1, 6th Cycle Housing Element Lawsuit and Approval, the City was the subject of a Court Order[1] to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. In August 2022, a Stipulated Judgment was entered on the lawsuit requiring certain actions by the City within certain time period to bring the Housing Element into compliance with Section 65754 of the Government Code. As part of this Court Order, one of the requirements was adopting the Housing Element by May 31, 2023, and prepare environmental review documentation pursuant to Government Code Section 65759 et. seq. On May 30, 2023, City Council approved the 2021–2029 Housing Element and adopted the associated Environmental Assessment.

While the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs. The Housing Element programs that must be adopted by September 27, 2023, are described under the header "Program Implementation" in Section 2.4.4, 2021–2029 Housing Element, in Section 2.0 of this PEIR. The policies and programs in the adopted 2021–2029 Housing Element are reflected in both the General Plan and DTSP Update, being prepared contemporaneously. The central strategy of the General Plan and DTSP Update and 2021–2029 Housing Element Implementation Programs Project (Project, proposed Project) is to preserve and enhance the distinctive neighborhoods and direct calibrated growth primarily to five focus areas including the Downtown area (i.e., DTSP), Ostrich Farm District, and three Neighborhood Centers on Huntington Drive while providing an enhanced variety of housing opportunities.

The General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would accommodate a total of 2,775 residential DUs and 430,000 square feet (sf) of non-residential uses, comprised of retail and office development, in addition to both the existing land uses (see Table 2-4 in Section 2.0 of this PEIR). The full buildout of the Project, for purposes of this PEIR, would generate up to an additional 6,882 residents (assuming no residential vacancies) and 1,978 jobs in the City through 2040 compared to existing conditions.

[1] Stipulated Judgment (*Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161*).

It is important to note that the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. The General Plan and DTSP Update serve as a long-term policy guide for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City. The adopted 2021–2029 Housing Element Implementation Programs serve as the policy guide for decision-making regarding residential development and demonstrates how the City intends to comply with State housing legislation and regional (i.e., SCAG) requirements.

4.1.2 PROJECT OBJECTIVES

Section 15124 of the State CEQA Guidelines requires an EIR to include a statement of the proposed project's objectives. The proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs seek to achieve the following key objectives:

1. Provide sufficient capacity for housing development in compliance with State policy mandates. Address the shortage of housing for lower-income households and promote an inclusive residential environment that welcomes all people into the community.
2. Preserve natural areas, enhance parks and open spaces to provide enriching recreational opportunities and ensure access to those spaces for people of all ages and abilities.
3. Attract and retain high value, high-wage jobs within the creative sector, diversify the local economy, promote and support local businesses, increase local tax base to help fund vital public services.
4. Direct new growth to the downtown area along Mission Street and Fair Oaks Avenue, as well as opportunity sites such as the Ostrich Farm District, while ensuring the continued character of existing residential areas.
5. Develop clear and precise standards that offer predictable outcomes and processes.
6. Encourage pedestrian-oriented mixed-use development, while providing new and enhancing existing public spaces and gathering places, creating vibrant cultural hubs that weave creative expression into everyday life.
7. Provide safe access for all street users–pedestrians, cyclists, public transit users, and motorists–of all ages and abilities. Support an integrated multi-modal network and efficiently manage parking to support wider community goals.
8. Increase individual, institutional, and business capacity to survive and adapt to any chronic stress or acute shocks and be able to recover and thrive.
9. Create environments that encourage safe and healthy lifestyles and maximize the opportunities for physical activity. Design the public and semi-public realm to foster social interaction and develop good programming to draw people out of their homes and into the community.
10. Create a vibrant cultural center by weaving creative expressions into everyday life.

4.1.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As previously mentioned, an EIR should consider a range of feasible alternatives that would attain most of the project objectives listed above, while reducing or eliminating one or more of the significant and unavoidable impacts of the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, which include:

- Aesthetics (Visual Character at a program and cumulative level);
- Air Quality (Air Quality Management Plan Consistency, Regional Construction and Operational Emissions Standards Violation, and Cumulative Emissions at a program and cumulative level; Local Construction Emissions Standards Violation at a program level);
- Cultural Resources (Historic Resources at a program and cumulative level);
- Greenhouse Gas Emissions (GHG Emissions at a cumulative level);
- Noise (Construction and Exterior Traffic Noise Standards Violation at a program and cumulative level); and
- Population and Housing (Population Growth at a program and cumulative level).

4.1.4 ALTERNATIVES TO THE PROPOSED PROJECT

In accordance with the Section 15126.6(a) of the State CEQA Guidelines, this section summarizes the range of alternatives considered in the PEIR.

The following alternatives have been considered and eliminated from detailed consideration for the reasons identified in Section 4.2, below:

- Alternative Site,
- No Project/No Development; and
- Distributed Housing Growth.

Alternatives that are considered in detail in this PEIR include:

- Alternative 1: No Project/Existing General Plan; and
- Alternative 2: Reduced Development Capacity.

It is noted that the City is required to adopt the 2021-2029 Housing Element Implementation Programs, including rezoning to reflect the 2021-2029 Housing Element. As such, any alternative that assumes residential development capacity below that addressed in the 2021-2029 Housing Element is not feasible, both under State law and pursuant to the Court Order discussed above. Nevertheless, for illustrative purposes solely for the purposes of this PEIR, the potential impacts with a smaller amount of residential and/or non-residential development compared to the Project, Alternatives 1 and 2 identified above are analyzed below. However, neither of these alternatives could be considered by the City of South Pasadena for approval in lieu of the Project.

4.2 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

Section 15126.6(c) of the CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process and (2) briefly explain the

reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives; (2) infeasibility; or (3) inability to avoid significant environmental impacts.

4.2.1 ALTERNATIVE SITE

Section 15126.6(f)(2)(A) of the State CEQA Guidelines indicates that, in determining the consideration of an alternative location, "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR". Section 15126.6(f)(3) of the State CEQA Guidelines further states "an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative". Because the goals, policies, and actions, as well as the proposed Land Use Map, in the proposed General Plan and DTSP Update are specific to and encompass the entirety of the City of South Pasadena, an alternative site where the City has no jurisdiction is not feasible. Therefore, further analysis of an alternative site in this PEIR is not required.

4.2.2 NO PROJECT/NO DEVELOPMENT

Section 15126.6(e) of the State CEQA Guidelines requires than an EIR evaluate a "no project" alternative to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. Section 15126.6(e)(3) of the State CEQA Guidelines describes the two general types of no project alternative: (1) when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no project alternative would be the continuation of that plan and (2) when the project is not a land use/regulatory plan, such as a specific development on an identifiable property, the no project alternative is the circumstance under which that project is not processed (i.e., no development occurs). In addition, Section 15126.6(e)(2) of the State CEQA Guidelines specifies that the "No Project analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services". The Recirculated Notice of Preparation for the Project was circulated in April 2021.

No project option 1 above is analyzed below as the No Project/Existing General Plan Alternative. No project option 2, No Project/No Development Alternative, has been eliminated from detailed consideration because assuming no development would occur in the City of South Pasadena in the future is neither reasonable nor feasible. Therefore, further analysis of the No Project/No Development Alternative in this PEIR is not required.

4.2.3 DISTRIBUTED HOUSING GROWTH

As discussed in Section 2.0, Environmental Setting and Project Description, as part of Housing Element development, the City must demonstrate to the State that there is available capacity within its jurisdictional boundaries to meet its targeted RHNA number. This alternative considers demonstrating the City's capacity to support the Project's 2,775 DUs, at different income levels, by identifying housing sites that are more evenly distributed throughout the City instead of concentrating residential growth at higher intensities primarily in the strategic focus areas near the Metro A Line and arterial roadways. The biggest differences between the Project and this alternative would be (1) substantive changes in residential densities within more established neighborhoods and (2) targeting open space and other undeveloped spaces for housing. To

provide capacity for this high number of units with a more even distribution, portions of established neighborhoods would be expected to incur rezoning at higher densities. This alternative would lead to a reduced ability to preserve existing housing stock. This approach would not achieve many of the Project objectives identified above. More importantly, distributed housing distributed would not result in the environmental, economic, and social benefits that occur with a land use plan that includes more diversified and interwoven mix of residential and non-residential uses, in particular located close to transit and active transportation opportunities. This alternative would be expected to have increased criteria pollutant emissions and GHG emissions, from additional construction activity and long-term vehicle travel; increased changes to existing visual conditions; and potentially increased effect on historic resources. Traffic noise levels would be increased, though not always to a perceptible level, more evenly throughout the City. This alternative would not reduce any identified significant and unavoidable impacts of the Project and would worsen several impact categories. Additionally, based on community input during plan development, this pattern of housing development was not preferable to the Project's proposed pattern. Therefore, the Distributed Housing Alternative has been eliminated from detailed consideration, and further analysis of this alternative in this PEIR is not required.

4.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED CONSIDERATION

The analysis of each of the project alternatives identified below includes the following:

- A description of the alternative.
- An analysis of environmental impacts and a comparison to the possible impacts of the proposed project. Pursuant to the State CEQA Guidelines, if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.
- An assessment of the alternative's ability to meet the project objectives (previously identified in Section 4.1.2).

The comparison of impacts between each alternative and the proposed Project assumes that the general nature and types of (1) existing regulations; (2) proposed General Plan and DTSP Update goals, policies, and actions; and (3) the Mitigation Measures (MMs) identified in Section 3.0, Environmental Analysis, of this PEIR would also be applicable to each of the alternatives, where appropriate.

4.3.1 ALTERNATIVE 1: NO PROJECT/EXISTING GENERAL PLAN

Description of the Alternative

The proposed Project is the revision of an existing land use plan, accordingly, pursuant to Section 15126.6(e)(3)(A) and the State CEQA Guidelines, this No Project/Existing General Plan Alternative considers the comparative environmental impacts of the continued implementation of the existing General Plan, based on the existing conditions in and around January 2018 through the planning horizon of the Project (2040).

This alternative assumes the 1998 General Plan and 2014–2021 Housing Element would remain as the adopted long-range planning policy document for the City of South Pasadena, with future development occurring pursuant to the City's General Plan goals and policies and Land Use Map in effect currently, and prior to the General Plan and DTSP updates, and related Housing Element Implementation Programs. The current Land Use Map is provided in Exhibit 2-2 in Section 2.0,

Environmental Setting and Project Description, of this PEIR. As discussed above, the 2021–2029 Housing Element has been adopted. However, continuation of the existing (1998) General Plan is allowable. Further, as discussed above, the State CEQA Guidelines require a "no project" alternative be addressed. Therefore, as a purely hypothetical exercise, this Alternative 1 has been given detailed consideration solely for purposes of comparing and contrasting the environmental impacts of the Project, as proposed, with the reduced development scale of Alternative 1-continuation of the current General Plan/Mission Street Specific Plan, which reflects the 2014–2021 Housing Element, as the necessary zoning code updates have not been adopted.

Buildout under this alternative is estimated at 265 DUs in the City over the next approximately 20 years (through 2040), or approximately 10 percent of the Project's residential units. This estimate of residential development is derived from the assumption that the average of 13.25 DUs permitted per year, over the past 8 years, would continue over the next 20 years. Buildout under this alternative also estimates approximately 66,124 sf of non-residential (commercial/office) development, or approximately 15 percent of the Project's non-residential space. This estimate assumes that the floor area ratio (FAR) of 0.30 in the existing (1998) General Plan is applied to a total of 5.09 acres from select sites with development potential across a total of 12 parcels.

This development would generate approximately 657 residents[2] (assuming no residential vacancy) and 304 jobs[3]. Compared to the proposed Project, this development capacity would result in 2,510 fewer DUs, 363,876 less sf of commercial/office, 6,225 fewer residents, and 1,674 fewer jobs. While this Alternative does not reflect the five focus areas of the Project, based on current and recent land use patterns, this Alternative assumes that the most of this development would occur along Fair Oaks Avenue, Mission Street, within the Ostrich Farm, and more sparsely along other major arterials. Because this alternative assumes continuation of the existing General Plan, including 2014-2021 Housing Element, and MSSP, the policies and actions of the Project documents and the DTSP's development code are assumed not to be implemented under Alternative 1.

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 1 would result in a reduced level of visual change compared to the proposed Project, commensurate with the reduced geographic scope (i.e., extent of ground disturbance) and amount (i.e., number of DUs and total sf of non-residential) of potential development and redevelopment. Future development under this Alternative would result in similar types and proportions of land uses as currently exist, and be subject to the same design standards and processes as the Project, with the exception of the code in the DTSP Update. Any new light sources installed under Alternative 1 would be required to comply with the SPMC standards (Section 36.300.090) for exterior lighting. Accordingly, a lighting plan would be submitted to the City and requiring that lighting fixtures shall be appropriate in scale, intensity, and height to the use they are serving. Like the Project, Alternative 1 would not adversely affect a scenic vista, substantially degrade scenic resources within a scenic highway, or result in a substantial increase in light and glare. Because Alternative 1 assumes only 265 DUs, the number of developments including structures exceeding the City's 45-foot building height limit due to application of certain parts of the State Density Bonus Law would be lower than the Project. Because of the extremely reduced number of DUs compared to the Project, Alternative 1 would be considered to result in a

[2] Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

[3] Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).

less than significant impact on a program and cumulative level related to substantial degradation the City's visual quality and character, thus avoiding a significant and unavoidable impact attributed to the Project.

However, the City must implement the adopted 2021–2029 Housing Element Implementation Programs within 120 days of the Housing Element adoption or be in violation of the Court Order. The Court Order also includes seeking the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DUs/acre). As noted previously, assessment of Alternative 1 is not feasible and is provided as a hypothetical exercise to meet the CEQA requirement to assess a "no project" alternative.

Air Quality

Alternative 1 would generate reduced criteria pollutant emissions from construction and operation commensurate with the reduced amount of potential development compared to the Project. As discussed in Section 3.2, Air Quality, because the Project identifies future land uses and does not contain specific development proposals, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Additionally, due to the variables that must be considered when examining construction impacts (e.g., development rate, disturbance area per day, specific construction equipment and operating hours), it would be speculative to state conclusively that construction activity associated with the project would cause a significant air quality impact. Therefore, air pollutant emissions for construction activity have not been quantified. Similarly, consistent with SCAQMD guidance, an LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level analysis. Rather, the Applicant/Developer of any future Project requiring environmental evaluation pursuant to CEQA would be required to conduct project-specific air quality analyses that include mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible and consistent with all requirements of CEQA and the State CEQA Guidelines. In addition, for projects that are estimated to exceed the SCAQMD construction emissions significance thresholds, all feasible mitigation measures shall be applied to minimize construction-related air quality impacts, based on project-specific air quality modeling, to the maximum extent practically and technologically feasible. Nevertheless, as construction-related emissions cannot be accurately determined at this time, it is conservatively assumed that constriction related impacts would also be significant and unavoidable.

For the same reasons as the Project, construction of future development projects pursuant to Alternative 1 would be assumed to result in significant and unavoidable program and cumulative impacts during construction activity. The estimated operational emissions of the Project would exceed the SCAQMD threshold for regional volatile organic compounds (VOC) emissions by more than double. VOCs are an ozone (O_3) precursor. The primary source of VOC emissions would be consumer products. The operational emissions shown in Table 3.2-5 in Section 3.2, Air Quality, of this PEIR are not meant to be a precise, predictive estimate of regional air emissions over the planning horizon of the Project (i.e., 2040), but provide a generalized magnitude considering a conservative, worst-case set of parameters.

While air quality emissions do not increase or decrease in a strictly linear fashion with increases or decreases in development capacity, based on the development capacity of Alternative 1 being about 10 percent of housing units and 15 percent of non-residential, it is possible Alternative 1 would not result in significant operational emissions of VOCs. As discussed for the Project, operational emissions would be considered significant and unavoidable at a program and

cumulative level for Alternative 1, but less than the operational emissions associated with the development under the Project.

Regarding 2022 Air Quality Management Plan (AQMP) consistency, buildout of Alternative 1 would be below the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) population forecast for 2040 by 767 persons and would exceed the employment forecast by 2,020 jobs. As discussed further in Section 3.12, Population and Housing, projections of employment in the City are substantively underestimated by SCAG in the 2020–2045 RTP/SCS and this analysis does not directly compare the SCAG projection for employment and the City's anticipated future employment to reach a significance finding related to demographic growth. However, the AQMP requires the comparison to the correlating RTP/SCS. Therefore, based on the SCAQMD criteria, this alternative would result in significant and unavoidable impacts at a program and cumulative level related to inconsistency with the 2022 AQMP, same as the Project though to a lesser extent.

Although overall emissions would be reduced under this alternative, the focus of growth would remain the focus areas, in particular the DTSP and Ostrich Farm areas. As such, because there are properties within 500 feet of SR-110 that may be developed, this area presents a risk of exposure to diesel particulate matter (DPM, a toxic air contaminant [TAC]). Like the proposed Project, Alternative 1 would result in a less than significant impacts at a program and cumulative level related to exposure to TACs with MM AQ-1, which requires preparation of a Health Risk Assessment (HRA) for development projects that would include sensitive land uses within the area proximate to SR-110.

Biological Resources

Alternative 1 would result in reduced impacts to biological resources compared to the proposed Project, commensurate with the reduced geographic scope of potential development and redevelopment. Like the proposed Project, Alternative 1's potential impacts to biological resources would be reduced to a less than significant level at a program and cumulative level with implementation of MMs BIO-1 through BIO-5.

Cultural and Tribal Cultural Resources

Alternative 1 is expected to involve demolition or substantial alteration of fewer built environment resources compared to the proposed Project. Therefore, this Alternative would have a reduced potential to result in a substantial adverse change in the significance of a historic resource. However, it cannot be certain that a significant adverse effect to one or more existing or future identified historic resources would not occur with implementation of Alternative 1, resulting in a significant and unavoidable impact at a program and cumulative level, same as the Project though to a lesser extent.

Alternative 1 is anticipated to result in reduced impacts related to archaeological resources, tribal cultural resources, and human remains compared to the proposed Project, commensurate with the reduced geographic scope of potential development and redevelopment. Alternative 1 would involve less disturbance of ground on undeveloped land and less ground disturbance on developed land to greater depth or extent than past ground disturbance that could contain unknown buried historical or archaeological resources or human remains. However, development under this Alternative would be subject to the same policies and procedures related to historic preservation in the City and regulatory requirements related to encounter of remains. Like the proposed Project, Alternative 1's potential impacts to archaeological and tribal cultural resources

would be reduced to a less than significant level at a program and cumulative level with implementation of MM CUL-1.

Energy

Alternative 1 would result in less construction-related energy use and long-term stationary (i.e., not transportation/mobile) energy demand than the proposed Project, commensurate with the reduced geographic scope and amount of potential development and redevelopment. However, when taking into consideration that Alternative 1 would result in a less dense and less mixed land use pattern than the proposed Project, both fuel efficiency and total VMT (i.e., energy demand from operation) would be higher under this alternative. On balance, it is anticipated that Alternative 1 would result is less than significant impacts at a program and cumulative level related to the wasteful, inefficient, or unnecessary consumption of energy, or conflicts with plans for renewable energy or energy efficiency, similar to the Project.

Geology and Soils

Geologic and soils conditions, particularly seismic shaking and secondary seismic risks are essentially the same throughout most of the City. The hilly areas in the northeast and southwest may experience additional or slightly different conditions related to slope and/or underlying geologic units. Like the proposed Project, the design and construction of structures for human occupancy under Alternative 1 would require preparation of a geotechnical report and be subject to the same State, County, and City codes and requirements. Alternative 1 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. However, all construction projects under Alternative 1 would be subject to the same State or City stormwater quality requirements as the proposed Project. There would be less than significant impacts at a program and cumulative level related to geologic and soils conditions and erosion of topsoil.

Alternative 1 would involve less ground disturbance that could impact unknown paleontological resources than the proposed Project. Like the proposed Project, impacts to paleontological resources would be less than significant at a program and cumulative level after implementation of MM CUL-1.

Greenhouse Gas Emissions

Alternative 1 would generate reduced total GHG emissions from construction and operation of the reduced development capacity compared to the Project. However, as discussed below for Land Use and Planning, this alternative would result in higher vehicle miles traveled (VMT) for the City, as a whole, compared to the proposed Project. A higher VMT reflects greater relative contribution of the City per capita and per service population to GHG emissions. Therefore, while this Alternative would reduce development capacity to approximately 10 percent of residential and 15 percent of non-residential of that proposed with the Project, GHG emissions would potentially result in a significant impact on the environment. Impacts would remain significant and unavoidable at a cumulative level under Alternative 1, same as the Project. There are no feasible mitigation measures to reduce the identified construction- and operation-related GHG emissions because the finding is based on lack of project-specific details calculate emissions for individual future projects. There is no project to modify with mitigation to reduce or avoid GHG emissions.

As discussed further in Section 3.7, Greenhouse Gas Emissions, the City adopted its first CAP on December 16, 2020. The proposed Project was demonstrated to be consistent with the City's CAP, and the CAP is, in turn, consistent with State plans, policies, and regulations, AB 32, the

AB 32 scoping plan and updates, EO B-30-15, SB32, EO B-55-18, and other relevant policies and regulations, and there would be a less than significant impact at the cumulative level. The actions in the CAP would apply City-wide regardless of the amount of development. Therefore, Alternative 1 would also be consistent with the CAP and there would be a less than significant impact, same as the proposed Project.

Hazards and Hazardous Materials

Alternative 1 would result in reduced impacts related to hazards and hazardous materials as the proposed Project, because it involves less disturbance of soil that could be contaminated; and would involve less construction effort and thus less use of hazardous materials by construction projects. While the proposed Project would permit development of more residential units than Alternative 1 would, operation of residences generally involves use of only small amounts of hazardous materials for cleaning and maintenance purposes, and operational hazardous materials impacts would be generally similar for Alternative 1 compared to the proposed Project. Hazardous materials would be used in accordance with existing regulations. Fewer residents and construction workers would be potentially exposed to hazardous materials under Alternative 1 than under the proposed Project. Like the proposed Project, potential impacts related to hazards and hazardous materials would be less than significant at a program and cumulative level with implementation of MMs HAZ-1 and HAZ-2.

Hydrology and Water Quality

Alternative 1 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. Construction projects in each scenario would comply with State or City stormwater quality requirements, as applicable. Operational impacts to operational water quality standards and waste discharge requirements would be reduced, due to lower development intensity, compared to the proposed Project. However, like the proposed Project, there would be less than significant impacts at a program and cumulative level related to hydrology and water quality, including drainage patterns, through compliance with State and local regulations.

Developable vacant land in the City comprises less than one percent of the City's land area; thus, Alternative 1 and the proposed Project would each cause only minor increases in impermeable surfaces in the City. Alternative 1 would generate a lower increase in water demands compared to the proposed Project, commensurate with the reduced amount of potential development and redevelopment. The Main San Gabriel Groundwater Basin (basin), from which the City provides most of its water supply, is controlled by the Main San Gabriel Basin Watermaster. Regardless of the amount of potable water demand by the City, the Watermaster is responsible for monitoring groundwater levels and water quality, including the operating safe yields of the basin and extraction limits and amounts. Therefore, impacts on groundwater recharge and supply from Alternative 1 at a program and cumulative level would be similar to those of the proposed Project.

Land Use and Planning

Alternative 1 would result in a new significant and unavoidable impact at a program and cumulative level related to land use and planning because this alternative would not demonstrate to the State that the City can meet its mandated RHNA allocation. As such, this alternative would conflict with State planning law.

Alternative 1 would be less consistent with SCAG's 2020-2045 RTP/SCS, as the reduced amount of development and redevelopment would reflect a land use pattern that contribute less towards

the GHG emissions reduction targets compared to the proposed Project. This alternative would provide less residential, commercial/office, and mixed-use development near transit and other existing infrastructure (e.g., roads, utilities, services) and generally build at a lower density in selected portions of the City. Therefore, Alternative 1 would result in a higher VMT per capita and per service population for the City, as a whole, compared to the proposed Project. A higher VMT reflects greater relative contribution of the City to GHG emissions. Like the proposed Project, Alternative 1 would conserve established residential neighborhoods, would not substantially change the development pattern of the City, and would not divide established communities.

Noise

Alternative 1 would result in reduced noise impacts from construction and operation of the reduced development capacity compared to the Project. Alternative 1 would involve an approximate 90 percent reduction in residential development and an 85 percent reduction in non-residential development. Accordingly, buildout under Alternative 1 would result in reduced vehicle trips. However, as shown in Table 3.11-9 in Section 3.11, Noise, of this PEIR, the contribution of the proposed Project to noise generated solely from traffic would not result in a noticeable change in noise levels (i.e., three dBA) where the noise levels exceed 65 dBA CNEL. However, residential uses in the focus area would experience exterior noise levels that exceed existing General Plan standard. Therefore, the future exterior noise levels at residential uses after implementation of MM NOI-1 may remain above 65 dBA CNEL at some locations because this is a result of existing conditions and not buildout of the Project. Therefore, this impact would be reduced but remain significant and unavoidable at a program and cumulative level under Alternative 1. Interior noise levels and stationary source noise levels for future development projects, residential and non-residential, would remain less than significant at a program and cumulative level with implementation of MMs NOI-2 and NOI-3, respectively.

With reduced development capacity, there would likely be reduced construction activity over the planning horizon. As such, the significant and unavoidable construction noise impact at a program and cumulative level at receiver locations, after implementation of MMs NOI-4 and NOI-7, would affect fewer existing receptors. Like the proposed Project, vibration generated during construction would be less than significant at a program level with implementation of MMs NOI-4, NOI-5, and NOI-6.

Alternative 1 would not subject people in South Pasadena to excessive airport-related noise; the nearest airport to the City is the San Gabriel Valley Airport approximately six miles away.

Population and Housing

As discussed above, Alternative 1 assumes development of up to 265 DUs and 66,124 sf of non-residential (commercial/office) development in the City over the next 20 years (through 2040). Table 4-1, Comparison of SCAG Projections and Alternative 1 Buildout, provides a comparison of the 2040 SCAG growth projections and the Alternative 1 buildout projections.

TABLE 4-1
COMPARISON OF SCAG PROJECTIONS AND ALTERNATIVE 1 BUILDOUT

	Existing Conditions	Alternative 1 Buildout (2040)	SCAG Projections (2040)	Difference
Households	10,623[a]	10,873 (250 DUs)[a]	11,109[c]	-236 DUs / -2.1%
Housing Units	11,156[a]	11,421 (265 DUs)	11,822[a]	N/A
Population	25,580[a]	26,200 (620 persons)[a]	27,004[c]	-804 persons / -3.0%
Employment	13,700[b]	14,004 (304 jobs)	11,984[c]	+2020 jobs / 16.9%
Jobs-Housing Ratio	1.23	1.23	1.01	N/A

DU: dwelling units; N/A not applicable

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena. Population based on 2.48 persons per household for the number of housing units at this vacancy rate.

Sources:
[a] DOF 2022
[b] EDD 2022
[c] SCAG 2020, Aguilar 2021

As shown in Table 4-1, buildout of Alternative 1 would result in approximately 236 fewer households (2.1 percent) and 804 fewer residents (3.0 percent) (assuming a 5.5 percent vacancy rate) than SCAG's 2040 projections. This would not represent substantial unplanned population growth and therefore Alternative 1 would avoid a significant and unavoidable impact at a program and cumulative level of the Project. Regarding employment, Alternative 1 would result in approximately 2,020 more employees than the SCAG's projections. As discussed for the Project, projections of employment in the City are substantively underestimated by SCAG and this analysis does not directly compare the SCAG projection for employment and the City's anticipated future employment to reach a significance finding. For comparison, Alternative 1's projected employment of 14,004 represents an increase of about 2.2 percent or 0.1 percent per year from EDD's 2022 estimate of 13,700 jobs in the City. As shown, Alternative 1 would result in the same jobs-housing ratio as the existing conditions in the City and would be more jobs-rich than projected by SCAG. Again, this is due to the disparity between SCAG's and EDD's data. Regardless, an area with a ratio between 1.0 and 1.29 is considered to be "balanced" (SCAG 2001). Like the Project, Alternative 1 would result in a less than significant impact at a program and cumulative level related to employment growth.

Therefore, Alternative 1 would avoid the significant and unavoidable impact at a program and cumulative level related to demographic growth resulting from the inconsistency between SCAG's growth projections prepared as part of the 2020-2045 RTP/SCS and SCAG's 6th Cycle RHNA allocation, same as the Project. However, the Alternative 1 land use plan is less consistent than the Project with SCAG policies to encourage higher-density and mixed-use development, particularly near transit centers, such as the Metro A Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive and arterial roadways.

Like the proposed Project, Alternative 1 could cause some displacement of existing residential units and residents. Projects displacing residents would be mandated to comply with City and State requirements for tenant notification and relocation assistance programs. Conversion of residences due to projects undertaken by a public entity would be required to comply with the California Relocation Assistance Act and tenant protections required under SB 330 for appliable projects. Any residential displacement under Alternative 1 would not require construction of replacement housing, as Alternative 1 would permit construction of up to 265 residential units

resulting a net increase in housing supply. Like the Project, there would be no impacts related to displacement of housing or people that necessitates construction of housing elsewhere.

Public Services and Recreation

Alternative 1 would result in reduced demand for fire protection, police protection, school services, library services, and recreation facilities than the proposed Project, commensurate with the reduced amount of potential development and redevelopment. Therefore, like the proposed Project, Alternative 1's potential impacts to public services would be less than significant level at a program and cumulative level.

Transportation

Alternative 1 would result in reduced total VMT compared to the proposed Project, commensurate with the reduced amount of development or redevelopment and resultant density. However, this alternative would result in relatively higher VMT per capita and VMT per service population compared to the Project, which is the metric used to determine the significance of transportation impacts. Increasing density of land uses, especially when near transit and/or mixed with employment and services, reduces VMT. The proposed Project's land use plan provides a mix and density of land uses that contributes to reducing vehicle trips through improved alternative transportation options and proximity of housing to employment and services than in the existing condition. Also, unlike the Project, this alternative would not include the extensive transportation-related policies and actions that support reducing VMT, separate from the land use plan. However, without extensive modeling, it is unknown the actual VMT per capita or VMT service population that would result. Like the proposed Project, Alternative 1 would not cause substantial hazards due to a geometric design feature or incompatible roadway uses, and future projects developed under Alternative 1 must comply with City requirements to ensure adequate emergency access.

Utilities and Service Systems

Alternative 1 would generate reduced demands for utilities and service services, including water supply, water and wastewater infrastructure, wastewater treatment, dry utilities (i.e., electricity, natural gas, telecommunications), and reduced solid waste generation, commensurate with the reduced amount of development or redevelopment. However, through compliance with applicable regulations and proposed policies and actions, the Project would result in less than significant impacts at a program and cumulative level related to these utilities and service systems. Therefore, with reduced demands, Alternative 1 would also result in less than significant impacts at a program and cumulative level to water supply, water and wastewater infrastructure, wastewater treatment, solid waste, and dry utilities.

Wildfire

Like the proposed Project, it is possible that parcels in the City's High Risk Fire Area could be developed or redeveloped under Alternative 1, although the likelihood and extent of this activity would be lower. Also like the proposed Project, implementation of development under Alternative 1 would be required to comply with State and local codes and other regulations related to emergency access and building in wildfire hazard areas and on hillsides. Accordingly, Alternative 1 would result in less than significant impacts at a program and cumulative level related to emergency response or evaluation; exacerbating wildfire risks, including due to installation or maintenance of infrastructure; exposing persons to pollutant concentrations from wildfire; or exposing people or structures to significant risks after wildfire such as flooding or landslides.

Ability to Meet Project Objectives

Alternative 1 would not meet objective 1 to provide sufficient and inclusive housing capacity to meet State mandates. This alternative would be in violation of State law and would open the City to penalties.

Alternative 1 would meet 6 of the 10 Project objectives, as the objectives are more closely aligned with providing a high-quality environment rather than a certain amount of development. Specifically, objectives 2, 5, 7, 9, and 10 can be attained through policy implementation by the City unrelated to the location or extent of development. Similarly, objective 4 would be met because Alternative 1 would still direct growth primarily towards the downtown and Ostrich Farm areas, which is also a policy decision.

Alternative 1 would partially meet objectives 3, 6, and 8. For objective 3, while there would be increased employment compared to the existing conditions. it would be well below that envisioned for the Project. The Project's goal is to support a more diversified economy and tax base; the likelihood of high-value, high-wage jobs in the creative sector being among the approximately 304 jobs associated with this Alternative is reduced compared to the Project. For objective 6, the reduced amount of development or redevelopment would lead to reduced opportunities for providing pedestrian-oriented mixed-use development and enhancement of public spaces compared to the Project. For objective 8, the reduced development capacity would reduce the individual, institutional, and business capacity to adapt to and recover from economic or environmental events.

Conclusion

Alternative 1 would avoid the significant and unavoidable impact related to visual character. However, the City must adopt a 2021–2029 Housing Element Implementation Programs by September 27, 2023, or be in violation of State law and the requirements of the Court Order.

Alternative 1 would reduce criteria pollutant emissions and GHG emissions; however, the reduction would not eliminate the significant and unavoidable impacts associated with AQMP consistency, criteria air pollutant emissions, or GHG emissions. Exterior traffic noise levels would be reduced but a significant and unavoidable impact would remain, because this is a result of existing conditions and not buildout of the Project. This Alternative would expose fewer receptors to construction noise that may exceed the standard, but the potential impact on exposed receptors would remain significant and unavoidable. Alternative 1 would result in a new significant and unavoidable impact related to land use and planning as the number of dwelling units would be far below the 6th Cycle RHNA allocation for the City, which would violate State law, opening the City to penalties; and the Court Order to which the City is now subject, opening the City to Court-ordered sanctions.

For all other topics, impacts would be similar or reduced compared to the proposed Project. Although a lower level of development capacity may be preferable to some, this increment of reduction would not fully alleviate the significant and unavoidable impacts of the Project, by eliminating two impacts (aesthetics and population and housing) and adding one (land use and planning). From an environmental standpoint, perhaps most importantly, this alternative would not be as consistent with regional (SCAG) and State planning programs and policies related to reducing GHG emissions.

4.3.2 ALTERNATIVE 2: REDUCED DEVELOPMENT CAPACITY

Description of the Alternative

During preparation of the PEIR for the General Plan and DTSP Update, the City chose to combine the proposed housing element update into the proposed Project. Prior to incorporation of the Housing Element into this PEIR, the "Project" considered development of 589 DUs and 430,000 sf non-residential development. Similar to Alternative 1, as a hypothetical exercise to provide a the public and agencies with a comparative analysis of environmental impacts without full implementation of the 6th Cycle RHNA allocation and HCD-recommended surplus, this alternative presents the environmental analysis reflecting the above-described growth in condensed form as an alternative to the Project.

Therefore, Alternative 2 assumes a net increase in development capacity of 589 DUs (or approximately 21 percent of the Project's residential units) and 430,000 sf of non-residential (commercial/office) building area, same as the Project. As shown below in Table 4-2, Alternative 2 Development Capacity (2040), the total 500 DUs previously proposed and all of the net increase of 430,000 sf of non-residential uses would be permitted in the five focus areas, and 89 DUs in lots outside the focus areas, through the Project horizon year of 2040. Additionally, Alternative 2 assumes that proposed policies and goals and the DTSP's code would be implemented.

TABLE 4-2
ALTERNATIVE 2 DEVELOPMENT CAPACITY (2040)

Proposed Development Capacity	Size (acres)	Residential (DUs)	Non-Residential (sf)		Population
			Commercial	Office	
Corridors[a]					
Downtown Specific Plan Area	80.0	300	100,000	125,000	738
Districts[a]					
Ostrich Farm	13.4	75	5,000	100,000	185
Neighborhood Centers[a]					
Huntington Drive & Garfield Avenue	4.5	75	10,000	50,000	185
Huntington Drive & Fletcher Avenue	1.6	0	5,000	0	0
Huntington Drive & Fremont Avenue	7.4	50	10,000	25,000	123
Remainder of City[b]					
Vacant Lots Outside Focus Areas	N/A	89	0	0	219
Totals	–	**589**	**130,000**	**300,000**	**1,449**

du: dwelling units; sf: square feet; N/A: not available

Sources:
[a] South Pasadena 2017a
[b] Inloes 2018
[c] HR&A 2017

Comparative Analysis of Environmental Impacts

Aesthetics

Alternative 2 would result in a reduced level of visual change compared to the proposed Project, commensurate with the reduced geographic scope (i.e., extent of ground disturbance) and amount of potential development and redevelopment. Future development under this Alternative

would result in similar types and proportions of land uses as currently exist; the same height limits (including possible increased heights via the State Density Bonus Law and Court Order to which the City is now subject); and be subject to the same design standards and processes as the Project, including the code in the DTSP Update. Any new light sources installed under Alternative 2 would be required to comply with the SPMC standards (Section 36.300.090) for exterior lighting. Accordingly, a lighting plan would be submitted to the City requiring lighting fixtures shall be appropriate in scale, intensity, and height to the use they are serving. Like the Project, Alternative 2 would not adversely affect a scenic vista, substantially degrade scenic resources within a scenic highway, or result in a substantial increase in light and glare. Because of the reduced number of DUs compared to the Project, Alternative 1 would be considered to result in a less than significant impact on a program and cumulative level related to substantial degradation the City's visual quality and character, thus avoiding a significant and unavoidable impact attributed to the Project.

However, the City must implement the adopted 2021–2029 Housing Element Implementation Programs within 120 days of the Housing Element adoption or be in violation of the Court Order. The Court Order also includes seeking the repeal of the City's 45-foot height limit for residential or mixed-use residential projects on sites (i.e., not Citywide) where the base density calls for greater than 50 DUs per acre (DUs/acre). As noted previously, assessment of Alternative 2 is not feasible and is provided as a hypothetical exercise to assess the relative environmental impacts of a reduced residential development capacity.

Air Quality

Criteria pollutant emissions were quantified for the development of 589 DUs and 430,000 sf of non-residential growth as part of PEIR preparation prior to the inclusion of the 2021–2029 Housing Element Implementation Programs.[4] For purposes of comparison, the air quality modeling for the growth under Alternative 2 concluded there would be a significant and unavoidable impact related to operational nitrogen oxides (NOx), whose primary source is combustion engines. Emissions of VOCs were below the SCAQMD significance threshold. While air quality emissions do not increase or decrease in a strictly linear fashion with increases or decreases in development capacity, based on the development capacity of Alternative 2 being about 21 percent of housing units and 100 percent of non-residential, it is possible Alternative 1 would not result in operational emissions that exceed one or more applicable SCAQMD thresholds. As discussed for the Project, operational emissions would be considered significant and unavoidable at a program and cumulative level for Alternative 1, but less than the operational emissions associated with the development under the Project.

All other aspects of the air quality analysis performed for the growth under Alternative 2 were the same as the Project. Alternative 2 would generate reduced criteria pollutant emissions from construction. As discussed in Section 3.2, Air Quality, construction-related emissions are speculative and cannot be accurately determined at this stage of the planning process. Similarly, consistent with SCAQMD guidance, an LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level analysis. For the same reasons as the Project and as discussed for Alternative 1, construction of future development projects

[4] It is noted that the air quality modeling discussed for Alternative 2 is based on an earlier version of the California Emissions Estimator Model™ (CalEEMod). While the results between different CalEEMod versions are generally not substantially different, neither are they precisely the same. However, for purposes of an alternatives analysis, which is required to focus only on the comparative impacts (i.e., lesser, same, or greater), these results are useful to this analysis and are therefore discussed herein.

pursuant to Alternative 2 would be assumed to result in significant and unavoidable program and cumulative impacts during construction activity.

Regarding 2022 AQMP consistency, buildout of Alternative 2 would exceed the 2020–2045 RTP/SCS population forecast for 2040 by 25 persons and would exceed the employment forecast by 3,394 jobs. As discussed further in Section 3.12, Population and Housing, projections of employment in the City are substantively underestimated by SCAG and this analysis does not directly compare the SCAG projection for employment and the City's anticipated future employment to reach a significance finding related to demographic growth. However, the AQMP requires the comparison to the correlating RTP/SCS. Therefore, based on the SCAQMD criteria, this alternative would result in significant and unavoidable impacts at a program and cumulative level related to inconsistency with the 2022 AQMP, same as the Project through to a lesser extent.

Although overall emissions would be reduced under this Alternative, because there are properties within 500 feet of SR-110 that may be developed, this area presents a risk of exposure to diesel particulate matter (DPM, a toxic air contaminant [TAC]). Like the proposed Project, Alternative 2 would result in a less than significant impacts at a program and cumulative level related to exposure to TACs with MM AQ-1, which requires preparation of a HRA for development projects that would include sensitive land uses within the area proximate to SR-110.

Biological Resources

Alternative 2 would result in reduced impacts to biological resources compared to the proposed Project, commensurate with the reduced geographic scope of potential residential development and redevelopment. Like the proposed Project, Alternative 2's potential impacts to biological resources would be reduced to a less than significant level at a program and cumulative level with implementation of MMs BIO-1 through BIO-5.

Cultural and Tribal Cultural Resources

Alternative 2 is expected to involve demolition or substantial alteration of fewer built environment resources compared to the proposed Project. Therefore, this Alternative would have a reduced potential to result in a substantial adverse change in the significance of a historic resource. However, it cannot be certain that a significant adverse effect to one or more existing or future identified historic resources would not occur with implementation of Alternative 2, resulting in a significant and unavoidable impact at a program and cumulative level, same as the Project though to a less extent.

Alternative 2 is anticipated to result in reduced impacts related to archaeological resources, tribal cultural resources, and human remains compared to the proposed Project, commensurate with the reduced geographic scope of potential residential development and redevelopment. Alternative 2 would involve less disturbance of ground on undeveloped land and less ground disturbance on developed land to greater depth or extent than past ground disturbance that could contain unknown buried historical or archaeological resources or human remains. However, development under this Alternative would be subject to the same policies and procedures related to historic preservation in the City and regulatory requirements related to encounter of remains. Like the proposed Project, Alternative 2's potential impacts to archaeological and tribal cultural resources would be reduced to a less than significant level at a program and cumulative level with implementation of MM CUL-1.

Energy

Alternative 2 would result in less construction-related energy use and long-term stationary (i.e., not transportation/mobile) energy demand than the proposed Project, commensurate with the reduced geographic scope and amount of potential development and redevelopment. However, when taking into consideration that Alternative 2 would result in a slightly less dense and less mixed land use pattern than the proposed Project, both fuel efficiency and total VMT (i.e., energy demand from operation) would be higher under this Alternative. On balance, it is anticipated that Alternative 2 would result in less than significant impacts at a program and cumulative level related to the wasteful, inefficient, or unnecessary consumption of energy, or conflicts with plans for renewable energy or energy efficiency, like the Project.

Geology and Soils

Geologic and soils conditions, particularly seismic shaking and secondary seismic risks are essentially the same throughout most of the City. The hilly areas in the northeast and southwest may experience additional or slightly different conditions related to slope and/or underlying geologic units. Like the proposed Project, the design and construction of structures for human occupancy under Alternative 2 would require preparation of a geotechnical report and be subject to the same State, County, and City codes and requirements.

Alternative 2 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. However, all construction projects in Alternative 2 would be subject to the same State or City stormwater quality requirements as the proposed Project. There would be less than significant impacts at a program and cumulative level related to geologic and soils conditions and erosion of topsoil.

Alternative 2 would involve less ground disturbance that could impact unknown paleontological resources than the proposed Project. Like the proposed Project, impacts to paleontological resources would be less than significant at a program and cumulative level after implementation of MM GEO-1.

Greenhouse Gas Emissions

As discussed for the air quality analysis of Alternative 2 above, GHG emissions were quantified for the development of 589 DUs and 430,000 sf of non-residential growth as part of PEIR preparation prior to the inclusion of the 2021–2029 Housing Element Implementation Programs.[5] Alternative 2 would generate reduced GHG emissions from construction and operation of the reduced development capacity compared to the Project. However, for purposes of comparison, the GHG emission modeling for the growth under Alternative 2 concluded there would be an exceedance of the SCAQMD threshold of annual GHG emissions per service population.

Further, as discussed below for Land Use and Planning, this alternative would result in higher VMT for the City, as a whole, compared to the proposed Project. A higher VMT reflects greater relative contribution of the City per capita and per service population to GHG emissions. Therefore, while this Alternative would reduce residential development capacity to approximately 21 percent of that proposed with the Project, GHG emissions would result in significant impact. Like the proposed Project, because there are no feasible mitigation measures to reduce the construction- and operation-related GHG emissions because the finding is based on lack of

[5] Ibid.

project-specific details calculate emissions for individual future projects, impacts would remain significant and unavoidable at a cumulative level under Alternative 2, same as the Project.

As discussed further in Section 3.7, Greenhouse Gas Emissions, the City adopted its first CAP on December 16, 2020. The proposed Project was demonstrated to be consistent with the City's CAP, and the CAP is, in turn, consistent with State plans, policies, and regulations, AB 32, the AB 32 scoping plan and updates, EO B-30-15, SB32, EO B-55-18, and other relevant policies and regulations, and there would be a less than significant impact at the cumulative level. The actions in the CAP would apply City-wide regardless of the amount of development. Therefore, Alternative 2 would also be consistent with the CAP and there would be a less than significant impact, same as the proposed Project.

Hazards and Hazardous Materials

Alternative 2 would result in reduced impacts related to hazards and hazardous materials as the proposed Project, because it involves less disturbance of soil that could be contaminated; and would involve less construction effort and thus less use of hazardous materials by construction projects. While the proposed Project would permit development of more residential units than Alternative 2 would, operation of residences generally involves use of only small amounts of hazardous materials for cleaning and maintenance purposes, and operational hazardous materials impacts would be generally similar for Alternative 2 compared to the proposed Project. Hazardous materials would be used in accordance with existing regulations. Fewer residents and construction workers would be potentially exposed to hazardous materials under Alternative 2 than under the proposed Project. Like the proposed Project, potential impacts related to hazards and hazardous materials would be less than significant at a program and cumulative level with implementation of MMs HAZ-1 and HAZ-2.

Hydrology and Water Quality

Alternative 2 would involve less construction that could generate pollutants contaminating storm water runoff than the proposed Project. Construction projects in each scenario would comply with State or City stormwater quality requirements, as applicable. Operational impacts to operational water quality standards and waste discharge requirements would be reduced, due to lower development intensity, compared to the proposed Project. However, like the proposed Project, there would be less than significant impacts at a program and cumulative level related to hydrology and water quality, including drainage patterns, through compliance with State and local regulations.

Developable vacant land in the City comprises less than one percent of the City's land area; thus, Alternative 2 and the proposed Project would each cause only minor increases in impermeable surfaces in the City. Alternative 2 would generate a lower increase in water demands compared to the proposed Project, commensurate with the reduced amount of potential residential development and redevelopment. The Main San Gabriel Groundwater Basin (basin), from which the City provides most of its water supply, is controlled by the Main San Gabriel Basin Watermaster. Regardless of the amount of potable water demand by the City, the Watermaster is responsible for monitoring groundwater levels and water quality, including the operating safe yields of the basin and extraction limits and amounts. Therefore, impacts on groundwater recharge and supply from Alternative 2 at a program and cumulative level would be similar to those of the proposed Project.

Land Use and Planning

Alternative 2 would result in a new significant and unavoidable impact at a program and cumulative level related to land use and planning because this alternative would not demonstrate to the State that the City can meet its mandated RHNA allocation. As such, this alternative would conflict with State planning law, and create inconsistency with the recently adopted Housing Element.

Alternative 2 would be less consistent with SCAG's 2020-2045 RTP/SCS, as the reduced amount of residential development and redevelopment would reflect a land use pattern that contributes less towards the GHG emissions reduction targets compared to the proposed Project. This alternative would provide less residential and mixed-use development near transit and other existing infrastructure (e.g., roads, utilities, services) and generally build at a lower density in selected portions of the City. Therefore, Alternative 2 would result in a higher VMT per capita and VMT per service population for the City, as a whole, compared to the proposed Project. A higher VMT reflects greater relative contribution of the City to GHG emissions. Like the proposed Project, Alternative 2 would conserve established residential neighborhoods and would not substantially change the development pattern of the City, and would not divide established communities. However, the development pattern of the City would remain more similar to the existing condition than the Project.

Noise

Alternative 2 would result in reduced noise impacts from construction and operation of the reduced development capacity compared to the Project. Alternative 1 would involve an approximately 79 percent reduction in residential development and no reduction in non-residential development. However, as shown in Table 3.11-9 in Section 3.11, Noise, of this PEIR, the contribution of the proposed Project to noise generated solely from traffic not result in a noticeable change in noise levels (i.e., three dBA) where the noise levels exceed 65 dBA CNEL. However, residential uses in the focus area would experience exterior noise levels that exceed existing General Plan standard. Therefore, the future exterior noise levels at residential uses after implementation of MM NOI-1 may remain above 65 dBA CNEL at some locations because this is a result of existing conditions. Therefore, this impact would be reduced but remain significant and unavoidable at a program and cumulative level under Alternative 2. Interior noise levels and stationary source noise levels for future development projects, residential and non-residential, would remain less than significant at a program and cumulative level with implementation of MMs NOI-2 and NOI-3, respectively.

With reduced development capacity, there would likely be reduced construction activity over the planning horizon. As such, the significant and unavoidable construction noise impact at a program and cumulative level at receiver locations, after implementation of MMs NOI-4 and NOI-7, would affect fewer existing receptors. Like the proposed Project, vibration generated during construction would be less than significant at a program and cumulative level with implementation of MMs NOI-4, NOI-5, and NOI-6. Alternative 2 would not subject people in South Pasadena to excessive airport-related noise; the nearest airport to the City is the San Gabriel Valley Airport approximately six miles away.

Population and Housing

As discussed above, Alternative 2 assumes development of up to 589 DUs and 430,000 sf of non-residential development and in the City through 2040. Table 4-3, Comparison of SCAG

Projections and Alternative 2 Buildout, provides a comparison of the 2040 SCAG growth projections and the Alternative 2 buildout projections.

TABLE 4-3
COMPARISON OF SCAG PROJECTIONS AND ALTERNATIVE 2 BUILDOUT

	Existing Conditions	Alternative 2 Buildout (2040)	SCAG Projections (2040)	Difference
Households	10,623[a]	11,180 (557 DUs)[a]	11,109[c]	-71 DUs / -0.6%
Housing Units	11,156[a]	11,745 (589 DUs)	11,822[a]	N/A
Population	25,580[a]	26,961 (1,381 persons)[a]	27,004[c]	-43 persons / -0.1%
Employment	13,700[b]	15,678 (1,978 jobs)	11,984[c]	+ 3,694 jobs / +30.8%
Jobs-Housing Ratio	1.23	1.33	1.01	N/A

DU: dwelling units; N/A not applicable

Note: Housing units estimated based on number of households and a vacancy rate of 5.5 percent for South Pasadena. Population based on 2.48 persons per household for the number of housing units at this vacancy rate.

Sources:
[a] DOF 2022
[b] EDD 2022
[c] SCAG 2020, Aguilar 2021

As shown in Table 4-3, buildout of Alternative 2 would result in essentially the same number of households and population growth as the SCAG projections. This would not represent substantial unplanned population growth and therefore Alternative 2 would avoid a significant and unavoidable impact at a program and cumulative level of the Project. This is because, as discussed in Section 3.12, Population and Housing, of this PEIR, SCAG's projections in the RTP/SCS are based in part on coordination between the City and SCAG during preparation of the RTP/SCS and reflects the anticipated growth in the City prior to release of the unexpectedly high 6th Cycle RHNA. At that time, the City would have provided to SCAG demographic projections based on the proposed 589 DUs and 430,000 sf of non-residential formerly envisioned for the City.

Regarding employment, Alternative 2 would result in the same number of jobs as the Project. As discussed in Section 3.12, the projected employment of 15,678 jobs represents an increase of 1,978 jobs (or about a 14.4 percent increase or 0.72 percent per year) from EDD's 2022 estimate of 13,700 jobs. As shown, however, Alternative 2 would result in a higher jobs-housing ratio than both the existing conditions in the City (based on EDD data) and would be more jobs-rich than projected by SCAG. Again, this is due to the disparity between SCAG's and EDD's data. An area with a ratio between 1.0 and 1.29 is considered to be "balanced" (SCAG 2001). As such, development of Alternative 2 would lead to a potential jobs-housing ratio that is unbalanced through provision of relatively more employment than housing. This would result in a significant impact, unlike the Project, which would result in a less than significant impact at a program and cumulative level related to employment growth.

Therefore, Alternative 2 would avoid the significant and unavoidable impact at a program and cumulative level related to demographic growth resulting from the inconsistency between SCAG's growth projections prepared as part of the 2020-2045 RTP/SCS and SCAG's 6th Cycle RHNA allocation. However, the Alternative 2 land use plan is less consistent than the Project with SCAG policies to encourage higher-density and mixed-use development, particularly near transit centers

such as the Metro A Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive and arterial roadways.

Like the proposed Project, Alternative 2 could cause some displacement of existing residential units and residents. Projects displacing residents would be mandated to comply with City and State requirements for tenant notification and relocation assistance programs. Conversion of residences due to projects undertaken by a public entity would be required to comply with the California Relocation Assistance Act and tenant protections required under SB 330 for appliable projects. Any residential displacement under Alternative 2 would not require construction of replacement housing, as Alternative 2 would permit construction of up to 589 residential units resulting a net increase in housing supply. Like the Project, there would be no impacts related to displacement of housing or people that necessitates construction of housing elsewhere.

Public Services and Recreation

Alternative 2 would result in reduced demand for fire protection, police protection, school services, library services, and recreation facilities than the proposed Project, commensurate with the reduced amount of potential residential development and redevelopment. Therefore, like the proposed Project, Alternative 2's potential impacts to public services would not trigger the need for new or expanded facilities and would be less than significant level at a program and cumulative level.

Transportation and Traffic

Alternative 2 would result in reduced total VMT compared to the proposed Project, commensurate with the reduced amount of residential development or redevelopment and resultant density. However, this alternative would result in relatively higher VMT per capita and VMT per service population compared to the Project, which is the metric used to determine the significance of transportation impacts. It is noted that, compared to Alternative 1, Alternative 2 would result in relatively higher total VMT but improved VMT per capita and VMT per service population. Increasing density of land uses, especially when near transit and/or mixed with employment and services, reduces VMT. The proposed Project's land use plan provides a mix and density of land uses that contributes to reducing vehicle trips through improved alternative transportation options and proximity of housing to employment and services than in the existing condition. Like the Project, this alternative would include the extensive transportation-related policies and actions that support reducing VMT. However, without extensive modeling, it is unknown the actual VMT per capita or service population that would result. Like the proposed Project, Alternative 2 would not cause substantial hazards due to a geometric design feature or incompatible roadway uses, and future projects developed under Alternative 2 must comply with City requirements to ensure adequate emergency access.

Utilities and Service Systems

Alternative 2 would generate reduced demands for utilities and service services, including water supply, water and wastewater infrastructure, wastewater treatment, dry utilities (i.e., electricity, natural gas, telecommunications), and reduced solid waste generation, commensurate with the reduced amount of residential development or redevelopment. However, through compliance with applicable regulations and proposed policies and actions, the Project would result in less than significant impacts at a program and cumulative level related to these utilities and service systems. Therefore, with reduced demands, Alternative 2 would also result in less than significant

impacts at a program and cumulative level to water supply, water and wastewater infrastructure, wastewater treatment, solid waste, and dry utilities.

Wildfire

Like the proposed Project, it is possible that parcels in the City's High Risk Fire Area could be developed or redeveloped under Alternative 2, although the likelihood and extent of this activity would be lower. Also like the proposed Project, implementation of development under Alternative 2 would be required to comply with State and local codes and other regulations related to emergency access and building in wildfire hazard areas and on hillsides. Accordingly, Alternative 2 would result in less than significant impacts at a program and cumulative level related to emergency response or evaluation; exacerbating wildfire risks, including due to installation or maintenance of infrastructure; exposing persons to pollutant concentrations from wildfire; or exposing people or structures to significant risks after wildfire such as flooding or landslides.

Ability to Meet Project Objectives

Alternative 2 would not meet objective 1 to provide sufficient and inclusive housing capacity to meet State mandates. This alternative would be in violation of State law, opening the City to penalties; and the Court Order to which the City is now subject, opening the City to Court-ordered sanctions.

Alternative 2 would meet 6 of the 10 Project objectives, as the objectives are more closely aligned with providing a high-quality environment rather than a certain amount of development. Specifically, objectives 2, 5, 7, 9, and 10 can be attained through policy implementation by the City unrelated to the location or extent of development. Similarly, objective 4 would be met because Alternative 2 would still direct growth primarily towards the Downtown and Ostrich Farm areas, which is also a policy decision. Finally, objective 3 would be met because Alternative 2 would provide the same amount of non-residential development, and therefore employment, as the Project.

Alternative 2 would partially meet objectives 6 and 8. For objective 6, the reduced amount of development or redevelopment would lead to reduced opportunities for providing pedestrian-oriented mixed-use development and enhancement of public spaces compared to the Project. For objective 8, the reduced development capacity would reduce the individual, institutional, and business capacity to adapt to and recover from economic or environmental events.

Conclusion

Alternative 2 would avoid the significant and unavoidable impact related to visual character. However, the City must adopt a 2021–2029 Housing Element Implementation Programs by September 27, 2023, or be in violation of State law and the requirements of the Court Order.

Alternative 2 would reduce criteria pollutant emissions and GHG emissions; however, the reduction would not eliminate the significant and unavoidable impacts associated with AQMP consistency, criteria air pollutant emissions, or GHG emissions. Exterior traffic noise levels would be reduced but a significant and unavoidable impact would remain, because this is a result of existing conditions and not buildout of the Project. This Alternative would expose fewer receptors to construction noise that may exceed the standard, but the potential impact on exposed receptors would remain significant and unavoidable. However, Alternative 2 would result in a new significant and unavoidable impact related to land use and planning as the number of dwelling units would

be far below the 6th Cycle RHNA allocation for the City, which would violate State law and the Court Order to which the City is now subject.

For all other topics, impacts would be similar or reduced compared to the proposed Project. Although a lower level of development capacity may be preferable to some, this increment of reduction would not fully alleviate the significant and unavoidable impacts of the Project, by eliminating two impacts (aesthetics and population and housing) and adding one (land use and planning). From an environmental standpoint, perhaps most importantly, this alternative would not be as consistent with regional (SCAG) and State planning programs and policies related to reducing GHG emissions.

4.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. Section 15126.6(e)(2) of the State CEQA Guidelines states that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Table 4-4, Comparison of Impacts for Project Alternatives, beginning on the following page, provides a summary comparison of impacts resulting from both alternatives to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs.

As shown in Table 4-4, both alternatives would eliminate the significant and unavoidable impacts related to aesthetics (visual quality) and population because of the reduced residential development proposed in Alternatives 1 and 2. The latter impact resulting from the inconsistency between SCAG's growth projections prepared as part of the 2020-2045 RTP/SCS and SCAG's 6th Cycle RHNA allocation. However, because of the reduced residential development, both Alternatives 1 and 2 would result in a new significant and unavoidable impact related to land use and planning. Specifically, these alternatives would not accommodate the City's RHNA allocation and therefore would be in violation of State law as well as the Court Order to which the City is now subject. For all other topics, both Alternatives final impact finding is the same although the degree of impact varies compared to the Project. For instance, both alternatives would have a reduced impacts to public services as there would be less additional land use development; however, under Alternative 1 this comparative reduction would be greater than under Alternative 2 as it proposes the least amount of both residential and non-residential development. From an environmental standpoint, perhaps most importantly, Alternative 2 would be more consistent with regional (SCAG) planning programs and policies related to reducing GHG emissions pursuant to SB 375 and other State legislation.

Alternatives 1 and 2 would have the same consistency with most Project objectives. However, Alternative 2 would fully meet one additional objective (3) compared to Alternative 1. Objective 3 would be met because Alternative 2 would provide the same amount of non-residential development, and therefore employment, as the Project.

Therefore, Alternative 2 is concluded to be the environmentally superior alternative because of its greater amount of development capacity compared to Alternative 1, which results in greater consistency with both the 6th Cycle RHNA allocation, Court Order, and regional plans to reduce GHG emissions. Additionally, Alternative 2 more closely meets the Project objectives.

TABLE 4-4
COMPARISON OF IMPACTS FOR PROJECT ALTERNATIVES

Environmental Issue and PEIR Section	General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs	Alternative 1 (No Project/Existing General Plan) Comparison to the Project	Alternative 2 (Reduced Development Capacity) Comparison to the Project
3.1 Aesthetics	SU (Visual Character), LTS (Scenic Vistas, Highways, Light and Glare)	Elimination of Significant and Unavoidable Impact (Visual Character), Similar (Scenic Vistas, Highways, Light and Glare)	Elimination of Significant and Unavoidable Impact (Visual Character), Similar (Scenic Vistas, Highways, Light and Glare)
3.2 Air Quality	SU (AQMP Consistency, Construction and Operational Emissions), LTS (CO Hotspots, TACs) NI (Odors)	Reduced Impacts (Remains Significant and Unavoidable for AQMP Consistency, Construction and Operational Emissions), Similar (CO Hotspots, TACs, Odors)	Reduced Impacts (Remains Significant and Unavoidable for AQMP Consistency, Construction and Operational Emissions), Similar (CO Hotspots, TACs, Odors)
3.3 Biological Resources	LTS with MM	Reduced Impacts (All Thresholds)	Reduced Impacts (All Thresholds)
3.4 Cultural and Tribal Cultural Resources	SU (Historic Resources), LTS (Archaeological and Tribal Cultural Resources, Human Remains)	Reduced Impacts (Remains Significant and Unavoidable for Historic Resources), Similar (Archaeological and Tribal Cultural Resources, Human Remains)	Reduced Impacts (Remains Significant and Unavoidable for Historic Resources), Similar (Archaeological and Tribal Cultural Resources, Human Remains)
3.5 Energy	LTS	Similar Impacts (All Thresholds)	Similar Impacts (All Thresholds)
3.6 Geology and Soils	LTS (Geology), LTS with MM (Paleontological Resources)	Similar Impacts (Geology); Reduced Impacts (Paleontological Resources)	Similar Impacts (Geology); Reduced Impacts (Paleontological Resources)
3.7 Greenhouse Gas Emissions	SU (GHG Emissions), LTS (Plan Consistency)	Reduced Impacts (Remains Significant and Unavoidable for GHG Emissions), Similar (Plan Consistency)	Reduced Impacts (Remains Significant and Unavoidable for GHG Emissions), Similar (Plan Consistency)
3.8 Hazards and Hazardous Materials	LTS MM (Unknown Hazardous Waste During Construction, Cortese List), LTS (Routine Hazardous Materials Handling, Hazardous Emissions Near Schools, Emergency Response and Evacuation, Wildfire), NI (Airport Hazards)	Reduced Impacts (All Thresholds)	Reduced Impacts (All Thresholds)
3.9 Hydrology and Water Quality	LTS	Reduced Impacts (All Thresholds)	Reduced Impacts (All Thresholds)
3.10 Land Use and Planning	LTS	New Significant and Unavoidable Impact	New Significant and Unavoidable Impact
3.11 Noise	SU with MM (Construction Noise, Exterior Traffic Noise), LTS with MM (Construction and Operational Vibration, Interior Traffic, Stationary Source Noise), NI (Airport Noise)	Reduced Impacts (Remains Significant and Unavoidable for Construction Noise, Exterior Traffic Noise), Similar Construction and Operational Vibration, Interior Traffic, Stationary Source Noise, Airport Noise)	Reduced Impacts (Remains Significant and Unavoidable for Construction Noise, Exterior Traffic Noise), Similar Construction and Operational Vibration, Interior Traffic, Stationary Source Noise, Airport Noise)
3.12 Population and Housing	SU (Population and Housing Growth), LTS (Employment Growth and Housing/People Displacement)	Elimination of Significant and Unavoidable Impact (Population and Housing Growth), Similar (Employment Growth and Housing/People Displacement)	Elimination of Significant and Unavoidable Impact (Population and Housing Growth), Similar (Employment Growth and Housing/People Displacement)
3.13 Public Services and Recreation	LTS	Reduced Impacts (All Thresholds)	Reduced Impacts (All Thresholds)

Environmental Issue and PEIR Section	General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs	Alternative 1 (No Project/Existing General Plan) Comparison to the Project	Alternative 2 (Reduced Development Capacity) Comparison to the Project
3.14 Transportation	LTS	Unknown	Unknown
3.15 Utilities and Service Systems	LTS	Reduced Impacts (All Thresholds)	Reduced Impacts (All Thresholds)
3.15 Wildfire	LTS	Similar Impacts (All Thresholds)	Similar Impacts (All Thresholds)
NI: No Impact; LTS: Less than Significant; LTS with MM; Less than Significant with Mitigation; SU: Significant and Unavoidable Unmitigable Impact; SU with MM: Significant and Unavoidable with Mitigation; AQMP: Air Quality Management Plan; CO: carbon monoxide; TACs: toxic air contaminants			

4.5 REFERENCES

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SECTION 5.0 OTHER CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIRED CONSIDERATIONS

Section 15126 of the State California Environmental Quality Act (CEQA) Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. An Environmental Impact Report (EIR) must identify the following for the project being analyzed; the location of the required information in this Program EIR (PEIR) for the General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Programs Project (Project) is presented in parentheses:

a) Significant environmental effects of the proposed Project (see Table ES-1 and Sections 3.1 through 3.16);

b) Significant environmental effects which cannot be avoided if the proposed Project is implemented (see Table ES-1, Sections 3.1 through 3.16, and Section 4.0);

c) Significant irreversible environmental changes which would be involved in the proposed Project should it be implemented (see Section 5.1);

d) Growth-inducing impacts of the proposed Project (see Section 5.2);

e) The mitigation measures proposed to minimize significant effects (see Table ES-1 and Sections 3.1 through 3.16); and

f) Alternatives to the proposed Project (see Section 4.0).

5.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the Project. Section 15126.2(c) states:

> "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impact and, particularly, secondary impacts (e.g., highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current compensation is justified."

As such, a project would generally result in significant irreversible environmental changes if:

- The proposed consumption of resources is not justified (e.g., the project involved the wasteful or inefficient use of energy) (refer to Section 3.5, Energy);
- The project would involve a large commitment of nonrenewable resources; or
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Potential future development associated with implementation of the Project would consume limited, slowly renewable, and non-renewable resources. Over the long term, new development would require the commitment and reduction of nonrenewable and slowly renewable resources,

including petroleum fuels and natural gas (for vehicle emissions, construction, lighting, heating, and cooling of structures) and lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, roadways, and infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by long-term implementation of the Project (e.g., air quality through the combustion of fossil fuels and production of greenhouse gases, and water supply through the increased potable water demands for drinking, cooking, cleaning, landscaping, and general maintenance needs).

Future construction activities related to implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment. However, the Project would not be creating a need for jobs or housing. The proposed growth would fulfill an existing and anticipated future need that is based on estimates of local and regional population growth. Therefore, the non-renewable resources used in construction of future development projects pursuant to the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would be expected to be consumed by housing and employment-generating land uses that are anticipated, and are unfulfilled, in the San Gabriel Valley and the wider region. Additionally, the land uses proposed are not unusually wasteful or excessive in terms of construction materials and fossil fuel use.

Implementation of the Project would result in the continuation of long-term resource commitments to potential future development. The resources that would be committed during development would be similar to those currently consumed within the City. These would include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle trips, and water. Fossil fuels would represent the primary energy source associated with potential future development within the City, and the existing, finite supplies of these natural resources would be incrementally reduced. As discussed in Section 3.5, Energy, it is noted that the City is a member of Clean Power Alliance (CPA), which offers 100 percent renewable electricity as its default option to customers (South Pasadena 2020); and most customers in South Pasadena are choosing 100 percent carbon-free power. Any future development would occur in accordance with Title 24, Part 6 of the California Building Code in effect at that time, which sets forth conservation practices that would limit the amount of energy consumed by future development.

Most of the future growth under the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would consist of infill development and redevelopment, and much of this would be located in proximity to transit (light rail or bus) and/or walking distance to retail and services. The location and type of future growth in the focus areas is intended to reduce vehicle miles traveled (VMT) compared to land uses not located near transit and/or not near a mix of uses and services. Because the future growth in the City would be on or near sites of existing development and would provide a portion of the needed housing stock in the region, the Project would not be considered wasteful or inefficient in its use of fossil fuels, including energy resources.

Similarly, most of the future land uses would not include lawns or other large-scale landscaped areas, and landscaped areas proposed would be required to meet the requirements of Article III, Water Efficient Landscape, of the South Pasadena Municipal Code. As such, the Project would not be considered wasteful or inefficient in its use of water. Although minimal compared to the existing energy use of the City, because of the relatively small increment of growth and types and land uses, the fossil fuel and water requirements associated with implementation of the Project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

The State CEQA Guidelines also require a discussion of the potential for irreversible damage caused by environmental accidents associated with a project. While implementation of General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would result in the use, transport, storage, and disposal of hazardous materials and/or wastes typical of urban areas, such as associated with dry cleaners, restaurant and office cleaning/maintenance, and landscape maintenance, as described in Section 3.8, Hazards and Hazardous Materials, all activities would comply with applicable State and federal laws related to hazardous materials transport, use, and storage, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage, and such an accident causing irreversible damage is not considered reasonably foreseeable.

In summary, potential future development associated with the Project would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses through the year 2040. However, the use of such resources is anticipated and accounted for in the State, regional, and local regulations, which generally prohibit wasteful practices and require environmentally conservative actions, as summarized in the "Relevant Programs and Regulations" discussion within Sections 3.1 through 3.16 of this PEIR. Similarly, as discussed in Section 3.9, Land Use and Planning, the proposed Project is entirely consistent with the goals adopted in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, which is intended to reduce VMT, contribute to improved air quality, and greenhouse gas emissions, among other objectives. Therefore, although irreversible changes would result from implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs, such changes would not be considered significant, and no mitigation is required.

5.2 GROWTH-INDUCING IMPACTS

Pursuant to Section 15126.2(d) of the State CEQA Guidelines, this analysis examines ways in which the Project could foster economic or population growth or the construction of additional development, either directly or indirectly, in the surrounding environment.

Also, this section discusses whether the Project could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in several ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, and/or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. Although growth inducement itself is not considered an environmental impact, it could potentially lead to environmental effects.

Accordingly, a project may foster spatial, economic, or population growth in a geographic area if it meets one or more of the following criteria:

1. Removal of an obstacle to growth (e.g., construction or extension of major infrastructure, providing new access to an area);
2. Foster population growth (e.g., construction of additional housing), either directly or indirectly;
3. Foster economic effects that could result in other activities that could significantly affect the environment (e.g., changes in revenue base, employment expansion);

4. Establish a precedent-setting action that could result in other activities that could significantly affect the environment (e.g., an innovation, a change in zoning, general plan amendment); and/or
5. Development of or encroachment on an isolated or adjacent area of open space (being distinct from an in-fill project).

The potential growth-inducing impacts associated with the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs are evaluated below against these criteria. It should be noted that growth-inducing effects are not necessarily beneficial, detrimental, or of little significance to the environment (Section 15126.2[d] of the State CEQA Guidelines).

The impacts associated with the future development of vacant lots and the redevelopment/infill of existing properties to higher intensity or different land uses is analyzed in Sections 3.1 through 3.16 of this PEIR. As summarized in the Executive Summary of this PEIR, significant adverse impacts would be avoided or reduced to less than significant levels through compliance with the policies and actions in the proposed General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs; compliance with existing regulations; and required mitigation measures (MMs). Significant unavoidable adverse impacts would remain related to Aesthetics (3.1), Air Quality (Section 3.2), Cultural and Tribal Resources (Section Greenhouse Gas Emissions (Section 3.7), Noise (Section 3.11), and Population and Housing (Section 3.12).

As described in Section 2.0, Environmental Setting and Project Description, a general plan guides the development of a city or county and consists of policies actions and/or programs that would achieve the community's vision for its future. Accordingly, the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs is premised on a certain amount of growth taking place. As discussed in Section 2.0, the proposed Project presents an opportunity to re-evaluate the City's values; address broader issues; and respond to changing economic, environmental, legal, social, and regulatory settings. City of South Pasadena decision makers will use the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs to provide direction when making land use and public service decisions over the Project's approximately 17-year horizon (through 2040).

Since the City of South Pasadena is largely built out, the roadway and utility infrastructure systems are in place. Improvements to roads and other infrastructure would be implemented either to alleviate existing issues or in support of anticipated future growth. Extension of water and sewer lines (i.e., laterals), if needed, would be part of individual future projects and provide services to those developments. However, extensions or replacements of wet utilities (water and sewer infrastructure), dry utilities (i.e., electric, natural gas, telecommunications), or roadway improvements that would serve only the existing and proposed uses and would not serve other nearby areas may be an inducement to further (i.e., unplanned) development either within or near the City. It is also noted that because the City is almost entirely built out and the existing open space areas are not proposed for development, implementation of the Project would not result in development of or encroachment on an isolated or adjacent area of open space.

Implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would induce population growth within the City by facilitating directed growth in five strategic focus areas for infill development as well as potential housing development outside the focus areas. This analysis assumes the buildout of up to 2,775 additional dwelling units and 430,000 square feet of non-residential uses, comprised of retail and office development. This is estimated to generate up to an additional 6,882 residents and 1,978 jobs. Potential growth inducement impacts of adoption and implementation of the General Plan and DTSP Update &

2021–2029 Housing Element Implementation Programs are addressed in Section 3.12, Population and Housing, of this PEIR. As discussed in Section 3.12, the population, households, and employment estimated for buildout of the Project would exceed Southern California Association of Governments (SCAG) 2040 projections by 18.8 percent, 19.2 percent, and 30.8 percent, respectively, and would be considered an inducement of substantial population growth. As discussed in Section 3.12, SCAG's projections are based in part on coordination between the City and SCAG and reflect the anticipated growth in the City prior to release of the unexpectedly high 6th Cycle RHNA.

Regarding employment, as discussed in Section 3.12, buildout of the Project would reduce the City's existing jobs-housing balance from 1.23 to 1.13. An area with a ratio between 1.0 and 1.29 is considered to be "balanced" (SCAG 2001). Although the SCAG employment projection cannot be feasibly compared to the anticipated 2040 conditions, consideration of jobs-housing balance indicates the increase in employment would not be considered a substantial inducement of growth, as the jobs-housing ratio would be only slightly decreased (i.e., more housing-rich than the existing conditions). However, the proposed land use plan is consistent with SCAG policies to encourage higher-density and mixed-use development, particularly near transit centers such as the Metro A Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive. Consistency with SCAG policies was discussed in Section 3.10, Land Use and Planning. There would be a less than significant impact related to employment growth, and no mitigation is required.

Implementation of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs Project, which is, by definition, growth-inducing regardless of the significance finding for the Project in Section 3.12, would result in significant environmental impacts after mitigation, as presented in Sections 3.1 through 3.16 of this PEIR. This is considered a significant and unavoidable growth-inducing impact.

As discussed in Section 2.0, the DTSP Update has an accompanying code (Code) to guide the DTSP Update's implementation. Except as specifically referenced in the Code, the South Pasadena Municipal Code requirements in place for the Mission Street Specific Plan prior to the adoption of the General Plan and DTSP Update & 2021–2029 Housing Element Implementation Programs would be replaced by the Code's requirements for the DTSP area. If the General Plan and DTSP Update & 2021–2029 Housing Element documents are adopted, the City will subsequently need to review and update, as needed, its Zoning Code to make sure it is consistent with the land use policies in the General Plan Update. Also, it is noted that while the City has approved a 6th Cycle Housing Element, the City still must adopt zoning code updates that reflect not only the Housing Element Implementation Programs but the General Plan and DTSP Update. The Court Order specifies the City has 120 days from approval of the Housing Element–which is through September 27, 2023–to adopt the General Plan and DTSP Update and related rezoning to fully implement the approved Housing Element Implementation Programs. In particular, pursuant to the Court Order to which the City is party, Implementation Programs 2.e, 2.h, 2.m, 2.n, 3.a, 3.b, 3.n, and 5.b must be approved by September 27, 2023. The environmental impacts of the update to the Zoning Code consistent with State law (Section 65860 of the Government Code) to ensure consistency with the adopted General Plan, are encompassed in the environmental analysis of the General Plan Update in this PEIR. Similar to the discussion of growth inducement above, adoption of a General Plan, Specific Plan, and/or Housing Element and an update to the Zoning Code are, by definition, precedent setting actions, as these documents/codes set the path for future development in the City and would result in significant environmental impacts after mitigation, as presented in Sections 3.1 through 3.16 of this PEIR. This is considered a significant and unavoidable growth-inducing impact.

5.3 REFERENCES

South Pasadena (City of). 2020 (April 29, access date). Clean Power Alliance. https://www.southpasadenaca.gov/government/departments/public-works/environmental-programs/energy-efficiency/clean-power-alliance.

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APPENDIX A-1

2018 NOP AND COMMENT LETTERS

Notice of Preparation of an Environmental Impact Report and Notice of Scoping Meeting

DATE:	January 23, 2018
TO:	All Interested Parties
FROM:	City of South Pasadena 1414 Mission Street South Pasadena, CA 91030
SUBJECT:	Notice of Preparation of an Environmental Impact Report and Notice of Scoping Meeting for the South Pasadena General Plan and Downtown Specific Plan Update
NOP REVIEW PERIOD:	January 25, 2018, through February 23, 2018
SCOPING MEETING:	Monday, February 5, 2018, 7:00 PM to 9:00 PM (See below for further information)

The City of South Pasadena (City) will be the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and will prepare a Program Environmental Impact Report (EIR) for the City of South Pasadena General Plan and Downtown Specific Plan Update (Project). This Notice of Preparation (NOP) has been prepared and distributed by the City to solicit written comments from responsible and trustee agencies, from the State Office of Planning and Research, and interested organizations and individuals. The City is requesting input regarding the scope and content of the environmental information to be addressed in the Draft Program EIR. The City requests that any potential responsible or trustee agencies responding to this NOP reply in a manner consistent with Section 15082(b) of the State CEQA Guidelines, which allows for the submittal of any comments and/or inputs that are germane to your agency's statutory responsibilities in connection with the proposed Project. Your agency may need to use the Program EIR when considering issuance of any permits or other approvals.

The location, description, and the potential environmental effects of the proposed Project are summarized in this NOP. The City has determined that the proposed Project may have a significant effect on the environment and preparation of an EIR is required; as such, an Initial Study has not been prepared.

Project Location

The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately 5 miles northeast of downtown Los Angeles. The City is surrounded by several municipalities, including the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and unincorporated County of Los Angeles communities, including Garvanza and Highland Park, to the west. Regional access to the City is provided predominantly by State Route 110 (SR 110; Arroyo Seco Parkway), which transects the City. Interstate 210 (I 210) and SR 134 also provide regional access, with the nearest ramps located approximately 1 mile north of the northern City boundary. The Metro Gold Line also provides light rail access from the City's Mission Station to downtown Los Angeles, the City of Pasadena, and the northern San Gabriel Valley. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity.

The planning area for the Project includes the approximately 3.5 square miles, or 2,221 acres, within the incorporated City limits. The Project applies to all properties within the planning area.

Project Background

All California jurisdictions are required by State law (Section 65300 of Government Code) to prepare and maintain a planning document called a General Plan. The City of South Pasadena last comprehensively updated the General Plan in 1998, and the Mission Street Specific Plan (now referred to as the Downtown Specific Plan) was adopted in 1996. Since the adoption of the 1998 General Plan, several minor amendments have been adopted, including revisions to the Housing Element (2014) in accordance with State laws. The Project does not include an update to the Housing Element. City of South Pasadena decision makers will use the General Plan and DTSP Update to provide direction when making land use and public service decisions over the documents' 20-year horizon (through 2040).

The General Plan and DTSP Update represents the culmination of a comprehensive community outreach and involvement process and incorporates an updated community vision addressing relevant issues facing South Pasadena. The planning process began in January 2017 and included development of a Project website (www.plansouthpasadena.org), public surveys, stakeholder interviews, a lecture series, focus group meetings, pop-up workshops, and charrettes.

Project Description

The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. Exhibit 2, Existing Land Use Plan, and Exhibit 3, Proposed Land Use Plan, illustrate the type and distribution of land use designations for the City currently and under the Project, respectively. The General Plan and DTSP Update would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. The public review drafts of the General Plan and DTSP Update are available for viewing or download at www.plansouthpasadena.org/outcomes.html. It is noted that these documents are draft versions and will continue to be refined during the preparation of the EIR.

Through the public visioning process, the community has identified the character, intensity, and scale of infill development desired for vacant and underutilized tracts in selected areas. Specifically, the community wants new development to be respectful of the place; contribute to the vibrancy of the human experience; and have positive impacts on place-making, health, economy, and the environment. The General Plan and DTSP Update each include nine elements, and each of the elements features an overriding goal and policies and actions based on the goal.

- **Goals** are long-range, broad, comprehensive targets. Goals are not necessarily measurable or achievable; rather, they describe a desired end-state condition for South Pasadena.
- **Policies** describe context and rationale of desired outcomes and are focused and specific.
- **Actions** are specific proactive steps to achieve the goals. They are the critical link between long-range planning and current-decision making.

The elements and their content reflect the public visioning process. The overarching principle of each of the elements is provided below.

- **Our Natural Community.** Live in balance with our natural environment; preserve natural areas and increase the quantity of and access to open space.
- **Our Prosperous Community.** Attract and retain high value, high-wage jobs within the creative sector; diversify the local economy; promote and support local businesses; and build

the City's local tax base to create and sustain public amenities and services, while maintaining South Pasadena's small-town character and quality of life.

- **Our Well Planned Community.** Direct growth to identified areas while preserving and enhancing the distinctive and stable residential neighborhoods and provide housing opportunities for all. Encourage pedestrian-oriented mixed-use development while providing and enhancing new and existing public spaces and gathering places.
- **Our Accessible Community.** Provide safe access for all street users – pedestrians, cyclists, public transit users, and motorists – of all ages and abilities and support an integrated multimodal network and efficiently manage parking to support wider community goals.
- **Our Resilient Community.** Increase individual, institutional, and business capacity to survive and adapt to any chronic stress or acute shocks and be able to recover and thrive.
- **Our Healthy Community.** Create environments that encourage healthy and safe lifestyles where all feel able to be active in family, community, and neighborhood life; contribute to the vitality of the City; create a sense of belonging among residents; and have access to nutritious food.
- **Our Safe Community.** Increase awareness of and be prepared for emergencies, minimize threat to life and damage to structures from natural and human-caused hazards, and protect from exposure to excessive noise.
- **Our Active Community.** Add to and enhance our parks and open spaces to provide enriching recreational opportunities.
- **Our Creative Community.** Become a vibrant cultural center by weaving creative expressions into everyday life.

The focus of the General Plan Update is to preserve the stable and established neighborhoods and direct carefully calibrated growth to five specified areas. Table 1 summarizes the focus areas and maximum growth projections being considered in the Draft Program EIR, Exhibit 4, Proposed Focus Areas, depicts the names and boundaries of the five focus areas.

Table 1
General Plan Update Development Pattern

		Non-Residential	
	Residential (du)	**Retail (sf)**	**Office (sf)**
Corridors (Downtown Specific Plan)			
Mission Street and Fair Oaks Avenue	300	100,000	125,000
Districts			
Ostrich Farm	75	5,000	100,000
Neighborhood Centers			
Huntington Drive & Garfield Avenue	75	10,000	50,000
Huntington Drive & Fremont Avenue	50	10,000	25,000
Huntington Drive & Fletcher Avenue	0	5,000	0
Totals	**500**	**130,000**	**300,000**

du: dwelling units; sf: square feet
Source: Rangwala Associates 2017

The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Fair Oaks Avenue is a highly visible corridor with historic assets and many opportunities that complement those along the Mission Street Corridor. Exhibit 5 illustrates the existing land use plan for the DTSP area, and Exhibit 6 depicts an illustrative plan of the DTSP area upon buildout of projected growth as shown in Table 1.

Probable Environmental Effects

The City has determined that the proposed Project may have a potentially significant impact on the environment and that preparation of a Program EIR is the appropriate level of environmental documentation pursuant to CEQA. Implementation of the proposed Project has the potential to impact the following environmental topics: Aesthetics, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, and Utilities and Service Systems. No impacts to the following environmental topics are anticipated: Agriculture and Forest Resources and Mineral Resources.

NOP Review and Comment Period

The NOP review and comment period is from **Thursday, January 25, 2018,** through **Friday, February 23, 2018**. Due to the time limits mandated by State law, please send your written response at the earliest possible date but not later than 30 days after receipt of this NOP. In your response, please include the name of a contact person in your agency. Please direct your written comments to:

Mail: Mr. David Watkins, AICP
Director of Planning and Building
1414 Mission Street
South Pasadena, California 91030

Email: dwatkins@southpasadenaca.gov

Fax: (626) 403-7221

The City will consider all written comments regarding the potential environmental impacts of the Project to be addressed in the EIR. **Written comments must be submitted to this office by 4:00 PM, Friday, February 23, 2018.** Written comments will also be accepted at the scoping meeting described below.

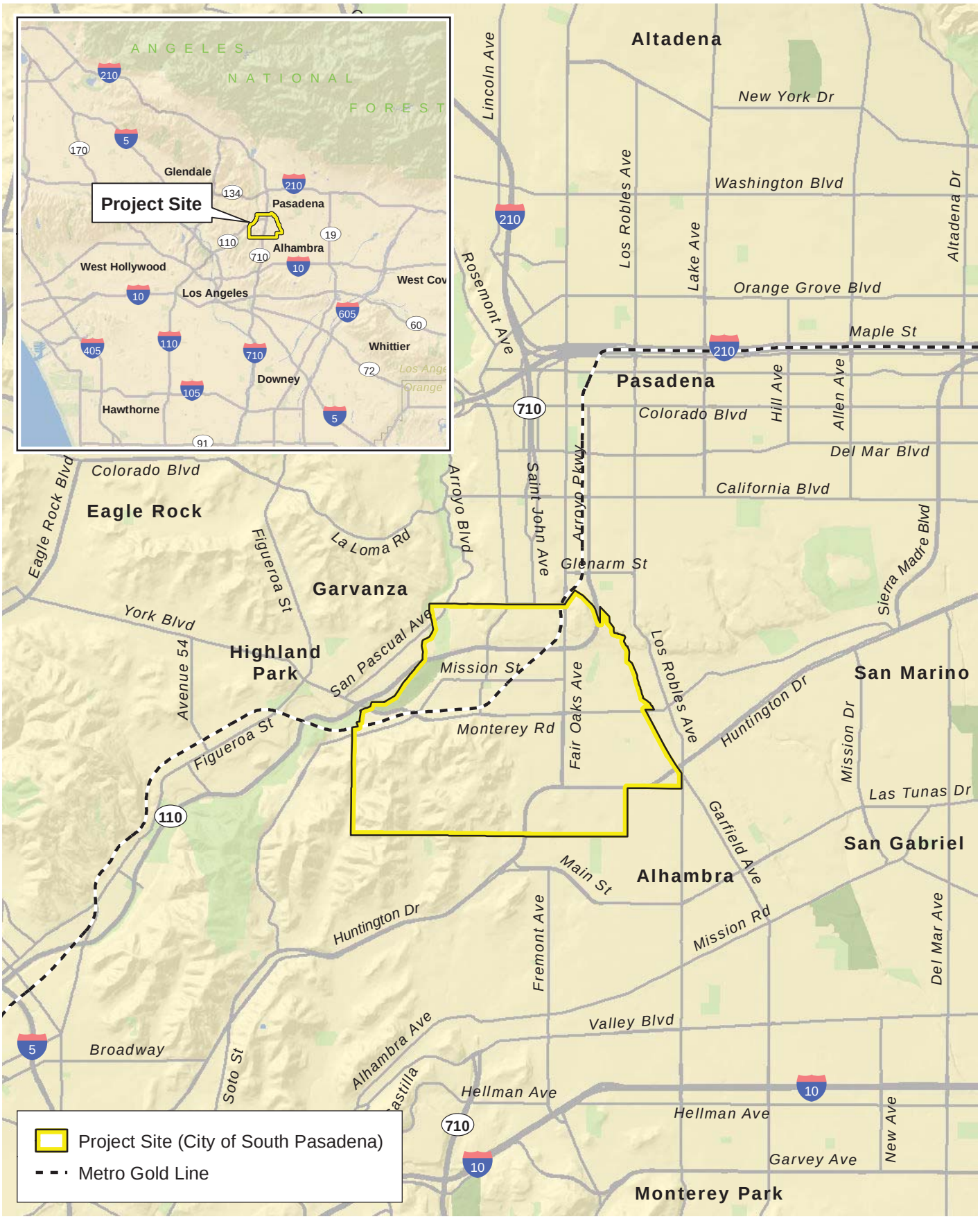
Scoping Meeting

A Scoping Meeting will be held to provide the public, trustee and responsible agencies, and other interested parties with information regarding the proposed Project and the environmental review process. City staff, consultants, and other representatives will be in attendance; and a presentation will be made beginning at 7:00 PM. Written comments may be submitted, but no verbal comments or public testimony will be taken at the Scoping Meeting. No decisions about the Project will be made at the Scoping Meeting. Separate public hearings will be scheduled after the completion of the EIR. The date, time, and location of the Scoping Meeting are as follows:

Date: Monday, February 5, 2018

Time: 7:00 PM to 9:00 PM

Location: South Pasadena Community Room
1115 El Centro Street
South Pasadena, California 91030



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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

N W E S

1 0.5 0 1 Miles

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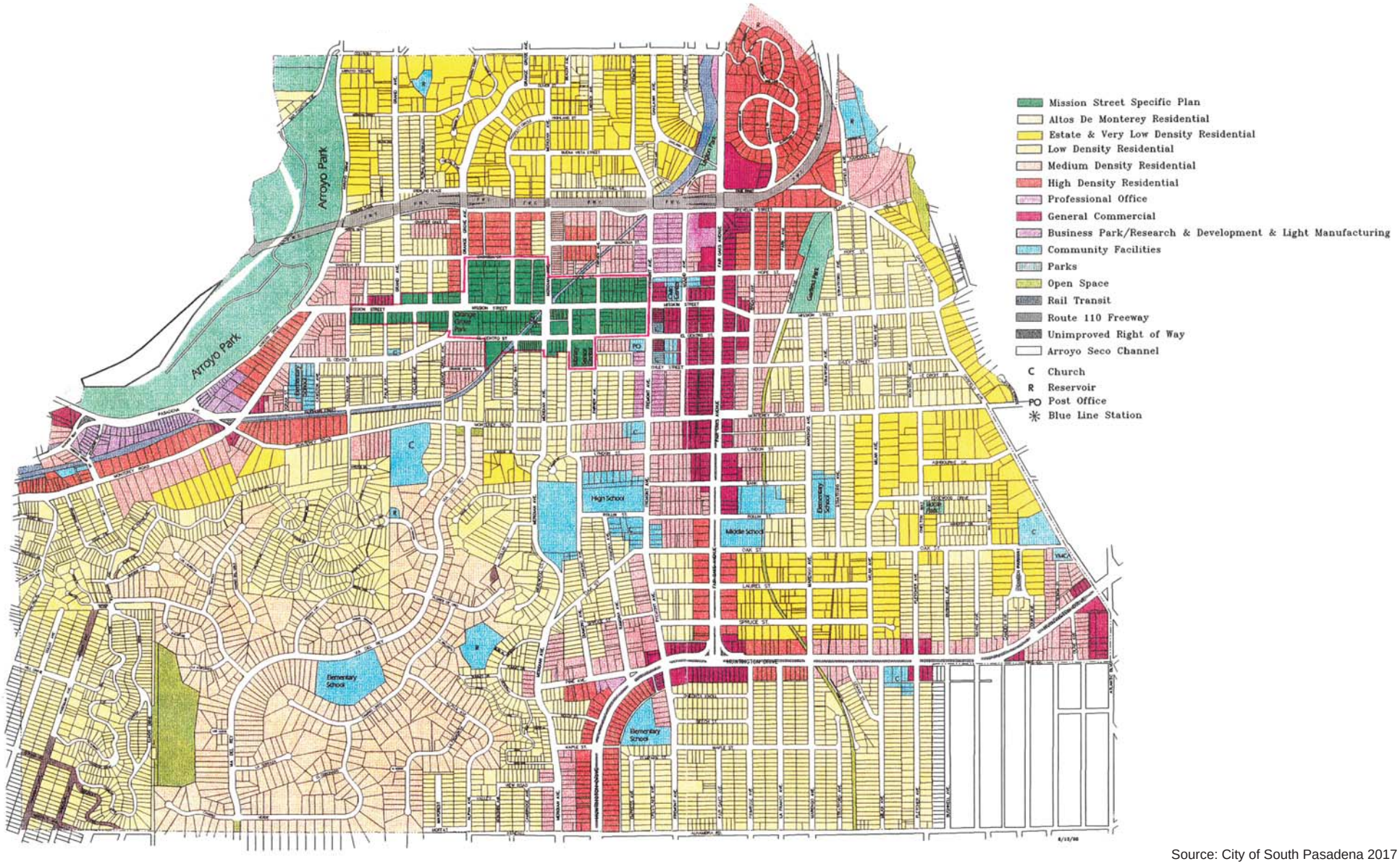

Source: City of South Pasadena 2017

Existing Land Use Map

Exhibit 2

South Pasadena General Plan and Downtown Specific Plan Update Project

PSOMAS

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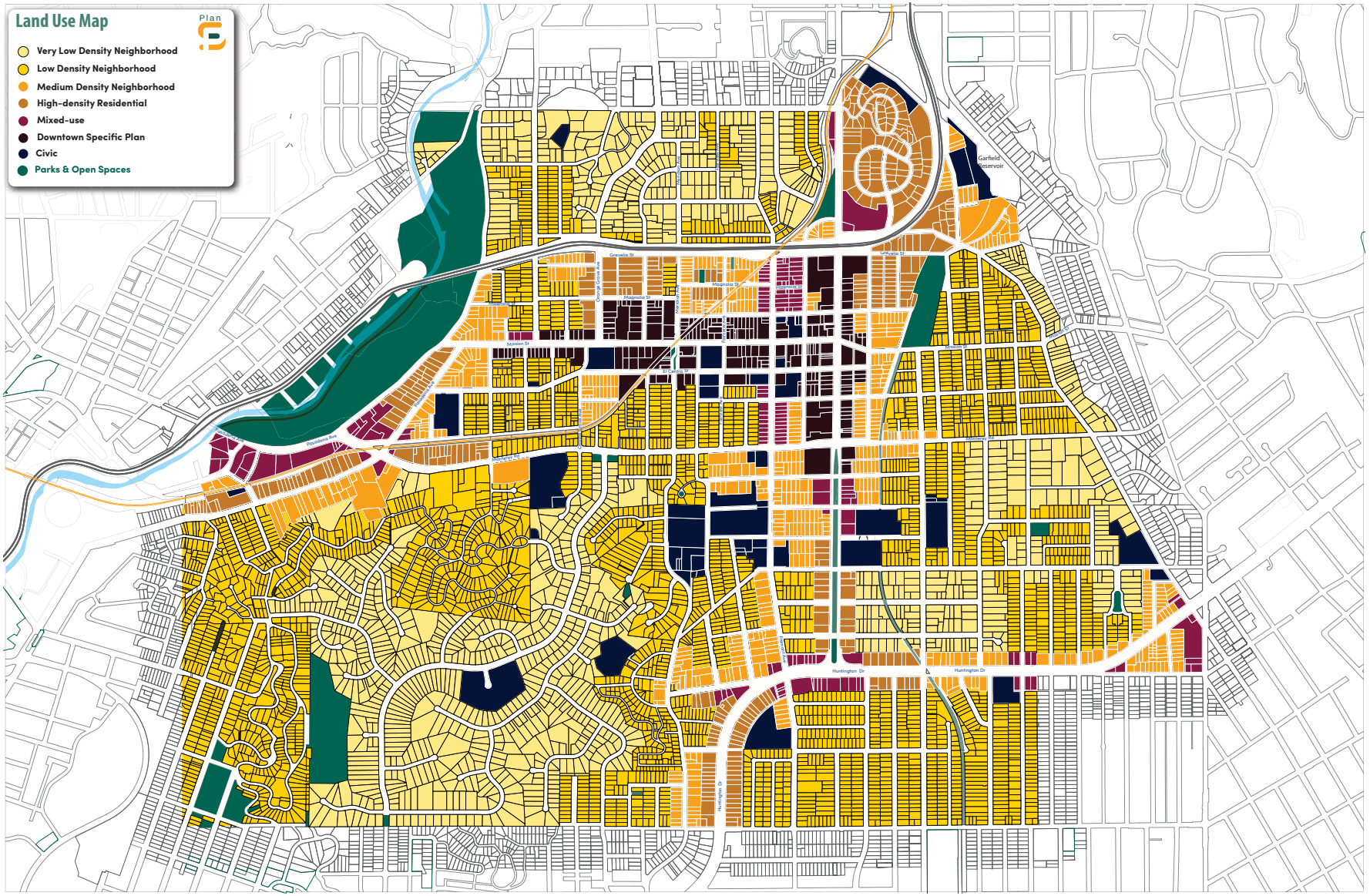

Source: Rangwala Associates 2017

Proposed Land Use Map

Exhibit 3

South Pasadena General Plan and Downtown Specific Plan Update Project

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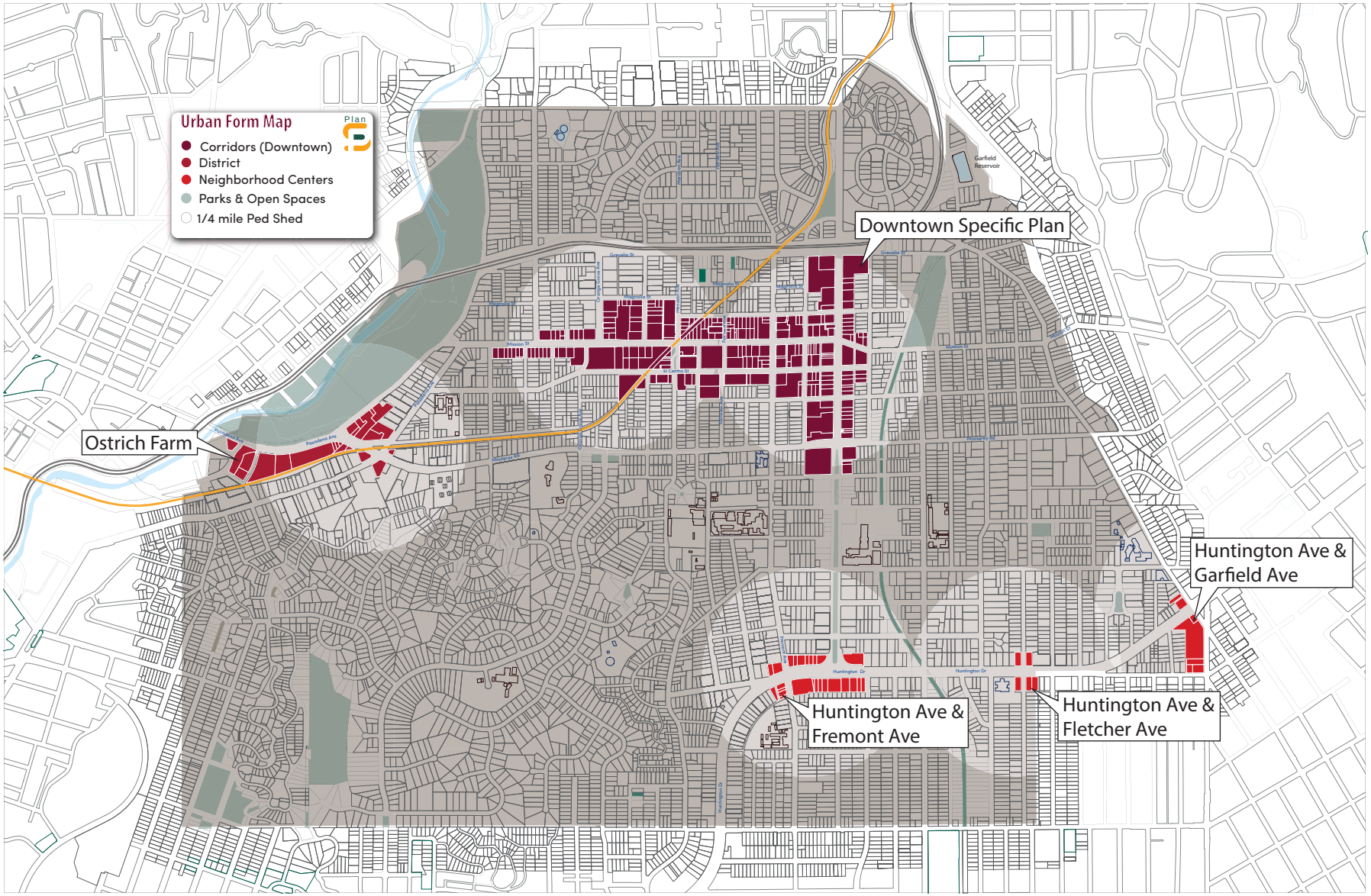

Source: Rangwala Associates 2017

Proposed Focus Areas

Exhibit 4

South Pasadena General Plan and Downtown Specific Plan Update Project

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Source: Rangwala Associates 2017

Downtown Specific Plan Existing Land Uses

Exhibit 5

South Pasadena General Plan and Downtown Specific Plan Update Project

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Source: Rangwala Associates 2017

Downtown Specific Plan Proposed Illustrative Plan

Exhibit 6

South Pasadena General Plan and Downtown Specific Plan Update Project

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STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

Notice of Preparation

January 30, 2018

To: Reviewing Agencies

Re: South Pasadena General Plan and Downtown Specific Plan Update
SCH# 2018011050

Attached for your review and comment is the Notice of Preparation (NOP) for the South Pasadena General Plan and Downtown Specific Plan Update draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

David Watkins
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2018011050
Project Title South Pasadena General Plan and Downtown Specific Plan Update
Lead Agency South Pasadena, City of

Type NOP Notice of Preparation

Description The GPU serves as a long-term policy guide for decision making regarding the appropriate physical development, resource conservation, and character of the city and establishes an overall development capacity for the city for the 2040 horizon year. Exhibit 2, existing land use plan, and exhibit 3, proposed land use plan, illustrate the type and distribution of land use designations for the city currently and under the project, respectively. The GP and DTSP Update would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements.

Lead Agency Contact

Name David Watkins
Agency City of South Pasadena
Phone 818/799-9101 **Fax**
email
Address 1414 Mission Street
City South Pasadena **State** CA **Zip** 91030

Project Location

County Los Angeles
City South Pasadena
Region
Cross Streets
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Aesthetic/Visual; Air Quality; Biological Resources; Tribal Cultural Resources; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Water Quality; Landuse; Noise; Population/Housing Balance; Housing; Public Services; Recreation/Parks; Traffic/Circulation; Other Issues

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy

Date Received 01/30/2018 **Start of Review** 01/30/2018 **End of Review** 02/28/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP Distribution List

County: Los Angeles

SCH# 2018011050

Resources Agency

- [■] **Resources Agency**
  Nadell Gayou
  - [ ] **Dept. of Boating & Waterways**
    Denise Peterson
  - [ ] **California Coastal Commission**
    Allyson Hitt
  - [ ] **Colorado River Board**
    Lisa Johansen
  - [ ] **Dept. of Conservation**
    Crina Chan
  - [ ] **Cal Fire**
    Dan Foster
  - [ ] **Central Valley Flood Protection Board**
    James Herota
  - [ ] **Office of Historic Preservation**
    Ron Parsons
- [■] **Dept of Parks & Recreation**
  Environmental Stewardship Section
  - [ ] **S.F. Bay Conservation & Dev't. Comm.**
    Steve Goldbeck
  - [■] **Dept. of Water Resources**
    Resources Agency
    Nadell Gayou

Fish and Game

- [ ] **Depart. of Fish & Wildlife**
  Scott Flint
  Environmental Services Division
- [ ] **Fish & Wildlife Region 1**
  Curt Babcock
- [ ] **Fish & Wildlife Region 1E**
  Laurie Harnsberger
- [ ] **Fish & Wildlife Region 2**
  Jeff Drongesen
- [ ] **Fish & Wildlife Region 3**
  Craig Weightman
- [ ] **Fish & Wildlife Region 4**
  Julie Vance
- [■] **Fish & Wildlife Region 5**
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6**
  Tiffany Ellis
  Habitat Conservation Program
- [ ] **Fish & Wildlife Region 6 I/M**
  Heidi Calvert
  Inyo/Mono, Habitat Conservation Program
- [ ] **Dept. of Fish & Wildlife M**
  William Paznokas
  Marine Region

Other Departments

- [ ] **California Department of Education**
  Lesley Taylor
- [ ] **OES (Office of Emergency Services)**
  Monique Wilber
- [ ] **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] **Dept. of General Services**
  Cathy Buck
  Environmental Services Section
- [ ] **Housing & Comm. Dev.**
  CEQA Coordinator
  Housing Policy Division

Independent Commissions,Boards

- [ ] **Delta Protection Commission**
  Erik Vink
- [ ] **Delta Stewardship Council**
  Anthony Navasero
- [ ] **California Energy Commission**
  Eric Knight
- [■] **Native American Heritage Comm.**
  Debbie Treadway
- [■] **Public Utilities Commission**
  Supervisor
- [ ] **Santa Monica Bay Restoration**
  Guangyu Wang
- [ ] **State Lands Commission**
  Jennifer Deleong
- [ ] **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Cal State Transportation Agency CalSTA

- [ ] **Caltrans - Division of Aeronautics**
  Philip Crimmins
- [ ] **Caltrans – Planning HQ LD-IGR**
  Christian Bushong
- [■] **California Highway Patrol**
  Suzann Ikeuchi
  Office of Special Projects

Dept. of Transportation

- [ ] **Caltrans, District 1**
  Rex Jackman
- [ ] **Caltrans, District 2**
  Marcelino Gonzalez
- [ ] **Caltrans, District 3**
  Eric Federicks – South
  Susan Zanchi - North
- [ ] **Caltrans, District 4**
  Patricia Maurice
- [ ] **Caltrans, District 5**
  Larry Newland
- [ ] **Caltrans, District 6**
  Michael Navarro
- [■] **Caltrans, District 7**
  Dianna Watson
- [ ] **Caltrans, District 8**
  Mark Roberts
- [ ] **Caltrans, District 9**
  Gayle Rosander
- [ ] **Caltrans, District 10**
  Tom Dumas
- [ ] **Caltrans, District 11**
  Jacob Armstrong
- [ ] **Caltrans, District 12**
  Maureen El Harake

Cal EPA

Air Resources Board

- [ ] **Airport & Freight**
  Jack Wursten
  - [ ] **Transportation Projects**
    Nesamani Kalandiyur
  - [ ] **Industrial/Energy Projects**
    Mike Tollstrup
- [ ] **California Department of Resources, Recycling & Recovery**
  Sue O'Leary
- [ ] **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- [ ] **State Water Resources Control Board**
  Cindy Forbes – Asst Deputy
  Division of Drinking Water
- [ ] **State Water Resources Control Board**
  Div. Drinking Water #_____
- [ ] **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] **State Water Resouces Control Board**
  Phil Crader
  Division of Water Rights
- [ ] **Dept. of Toxic Substances Control Reg. #_____**
  CEQA Tracking Center
- [ ] **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- [ ] **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] **RWQCB 3**
  Central Coast Region (3)
- [■] **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] **RWQCB 5S**
  Central Valley Region (5)
  - [ ] **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - [ ] **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- [ ] **RWQCB 6**
  Lahontan Region (6)
  - [ ] **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- [ ] **RWQCB 7**
  Colorado River Basin Region (7)
- [ ] **RWQCB 8**
  Santa Ana Region (8)
- [ ] **RWQCB 9**
  San Diego Region (9)

- [■] **Other** San Gabriel
- [ ] _____
  Conservancy

Last Updated 12/01 /17

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Making Conservation
A California Way of Life!

February 23, 2018

Mr. David Watkins
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

RE: South Pasadena General Plan and
Downtown Specific Plan Update
Notice of Preparation
SCH# 2018011050
GTS#07-LA-2018-01327

Dear Mr. Watkins:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The General Plan Update serves as a long-term policy guide for decision making regarding the appropriate physical development, resource conservation, and character of the city and establishes an overall development capacity for the city for the 2040 horizon year.

After reviewing the Notice of Preparation, Caltrans has the following comments:

Current Caltrans policies related to sustainable transportation and traffic safety support the endeavors of the General Plan and Downtown Specific Plan Update to create active transportation links and focusing growth along quality transit corridors. Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, the local agencies are encouraged to incorporate multi-modal transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

The draft documents received identify specific active transportation measures such bike lanes along Mission Street and Fair Oaks Boulevard. Caltrans supports these types of measures to promote more bicycling and improve overall traffic safety. In general, strong consideration should be given to implementing multi-modal safety measures that enhance conditions for all road users. This includes measures such as road diets, bike lanes, and other traffic calming elements. It should be noted the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Further, when considering implementation of innovative bicycle infrastructure, the City should consult resources such as the National Association of Transportation Officials' (NACTO) Urban Bikeway Design Guide, or FHWA Separated Bike Lane Planning and Design Guide, to assist in the design process. Caltrans formally endorsed the NACTO Guide in 2014 and the FHWA released its guide in 2015. Note the State's Highway Design Manual now contains provisions for protected bike lanes under "Design Information Bulletin Number 89: Class IV Bikeway Guidance (Separated Bikeways / Cycle Tracks)."

Also, existing research on parking suggests that increasing the amount of automobile parking spaces in new and existing developments not only encourages and enables more driving, but also increases the cost of housing. The City should be mindful of the role parking plays in generating automobile use and explore alternatives that permit developments to reduce the amount of parking provided. Such alternatives may include allowing developments to provide on-site car-sharing services, or high-quality bicycle parking instead of car parking.

Our Office of Traffic Operations asks special attention to safety be considered on and adjacent to nearby State facilities such as State Route 110 and Interstate 210. Additionally, in light of state legislation SB 743, at this stage the lead agency may choose to proceed with a vehicle miles traveled (VMT) transportation analysis instead of, or in addition to, more traditional level of service (LOS) analysis for the traffic study. The State currently anticipates statewide implementation of VMT in the year 2020. However, irrespective of methodology used, any transportation-related impacts that may arise as part of the Plan Update should be addressed through appropriate multi-modal mitigation measures to reduce the number of vehicle trips generated by the project. For any development project, the City may refer to the traffic study consultant to The Governor's Office of Planning and Research (OPR) website guidelines in the evaluation of traffic impact based on VMT methodology is used. The City may refer to OPR website for more information: http://opr.ca.gov/ceqa/updates/guidelines/

If you have any questions or concerns regarding these comments, please contact project coordinator, Severin Martinez at (213)-897-0067 or severin.martinez@dot.ca.gov and refer to GTS# 07-LA-2018-01327.

Sincerely,

FRANCES LEE
Acting CEQA/IGR Branch Chief

cc: Scott Morgan, State Clearinghouse

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

March 1, 2018

David Watkins, AICP
City of South Pasadena
Planning and Building
1414 Mission Street
South Pasadena, CA 91030

Dear Mr. Watkins:

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT, "SOUTH PASADENA GENERAL PLAN AND DOWNTOWN SPECIFIC PLAN," SERVES AS A LONG-TERM POLICY GUIDE FOR DECISION-MAKING REGARDING THE APPROPRIATE PHYSICAL DEVELOPMENT, RESOURCE CONSERVATION, AND CHARACTER OF THE CITY ESTABLISHES AN OVERALL DEVELOPMENT CAPACITY FOR THE CITY FOR THE 2040 HORIZON YEAR, SOUTH PASADENA, FFER 201800016

The Notice of Preparation of an Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

The subject property is entirely within the City of South Pasadena which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

LAND DEVELOPMENT UNIT:

This project is located entirely in the City of South Pasadena. Therefore, the City of South Pasadena Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department Land Development Unit's Inspector, Nancy Rodeheffer at (323) 890-4243.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

February 23, 2018

Mr. David Watkins
Director of Planning and Building
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

RE: Comment Letter – South Pasadena General Plan and Downtown Specific Plan Update – Notice of Preparation of an Environmental Impact Report

Dear Mr. Watkins:

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan update. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

The General Plan and Downtown Specific Plan serve as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The General Plan and Downtown Specific Plan would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements.

Metro Comments

Metro Gold Line Light Rail

The Metro Gold Line light rail currently operates weekday peak service as often as every five minutes in both directions. Trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW within the Plan Update area. Metro has an Adjacent Development Handbook and Construction Design Manual that describes Metro's development review process and considerations for project siting as it relates to Metro facilities. Metro strongly encourages policy language or guidance in the Specific Plan that clearly denotes development occurring within 100 feet of a Metro facility or ROW will require Metro review and approval, including compliance with Metro's development standards. In particular, because of the proximity to the Metro Gold Line ROW, increased traffic at railroad grade crossings must be considered

in the Specific Plan. Provisions for transit priority treatments should be considered to ensure efficient transit operation.

Metro strongly recommends that the Specific Plan include a minimum five (5) foot building setback from the Metro ROW to assure that property owners can maintain their property without entering Metro property, as well as policies encouraging transit-supportive public realm improvements, such as wide sidewalks, bus shelters, comfortable seating, pedestrian-scaled lighting, landscaping (i.e., street trees that provide continuous shade along transit access routes); multi-modal wayfinding signage (directing pedestrians to transit stops and stations, and from transit facilities to points of interest in the surrounding neighborhood); and enhanced, ADA-compliant street crossing elements adjacent to transit stops and stations (i.e., enhanced crosswalks, crossing signals, and accessible ramps).

Bus Service Adjacency

Several Metro bus lines, including Routes 78, 176, 258, 260, and 762, operate within the Specific Plan area. Metro recommends that the Specific Plan include language that calls for all future development activity within the Plan area to be coordinated with Metro as early as possible in order to ensure that the projects located in close proximity to a Metro facility do not impact bus operations.

Transit Orientation

Considering the proximity to the South Pasadena Gold Line Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City to be mindful of the presence of the South Pasadena Station, including orienting pedestrian pathways toward the station.

2. Metro would like to inform the Project sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.

3. Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies should be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.

4. With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the station including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.

5. The Plan should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

6. Metro encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of all development sites to improve pedestrian safety and comfort to access the nearby bus stops and rail station. The City should consider requiring the installation of such amenities as part of the conditions of approval for all projects.

7. Any planned wayfinding that also includes Metro content/information must conform to Metro Signage Standards. Please contact Lance Glover, Senior Manager with Metro Signage & Environmental Graphic Design, with any questions at GloverL@metro.net or 213.922.2360 for the latest version of these standards. Metro reserves the right to review and approve any use of its information on such signage.

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the Project sponsor of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).

2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.

3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Derek Hull at 213-922-3051 or by email at DevReview@metro.net.

Sincerely,

Derek R. Hull

Derek Hull
Manager, Transportation Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

APPENDIX

D

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ❑ Evidence that affected transit operators received the Notice of Preparation.
- ❑ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ❑ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ❑ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - ➢ Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - ➢ For each time period, multiply the result by one of the following factors:

    3.5% of Total Person Trips Generated for most cases, except:

    10% primarily Residential within 1/4 mile of a CMP transit center
    15% primarily Commercial within 1/4 mile of a CMP transit center
    7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
    9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
    5% primarily Residential within 1/4 mile of a CMP transit corridor
    7% primarily Commercial within 1/4 mile of a CMP transit corridor
    0% if no fixed route transit services operate within one mile of the project

  To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ❑ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

February 6, 2018
Ref. Doc. No.: 4439550

Mr. David Watkins, AICP
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Dear Mr. Watkins:

NOP Response for the South Pasadena General Plan and Downtown Specific Update

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of an Environmental Impact Report for the subject project on January 29, 2018. The City of South Pasadena (City) is located within the jurisdictional boundaries of District No. 16. We offer the following comments:

1. Predicted Development Pattern and Intensity, *page 52*, matrix – The expected increase in average wastewater flow from the anticipated development, described as 500 residential units, 130,000 square feet of retail development, and 300,000 square feet of office space, is 199,750 gallons per day. It should be noted availability of sewer capacity depends upon project size and timing of connection to the sewerage system. Because there are other proposed developments surrounding the City, the Districts should review individual developments within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.

2. Wastewater System, *page 82*, first paragraph below subtitle – The paragraph states "South Pasadena's wastewater system discharges wastewater into the Los Angeles County Sanitation Districts' West Side Trunk Sewer line, which is located on Mission Street between Orange Grove Avenue and Diamond Avenue. The Districts' records indicate that the sewers located along Mission Street between Orange Grove Avenue and Diamond Avenue are owned and maintained by the City.

3. Wastewater System, *page 83*, fourth paragraph – The Whittier Narrows Water Reclamation Plant (WRP) currently produces an average recycled water flow of 7.3 million gallons per day (mgd), and the Los Coyotes WRP currently produces an average recycled water flow of 20.5 mgd.

4. All other information concerning Districts' facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

DOC: #4449781.D16

From: Huntley, Michael
To: David Watkins
Subject: Response to NOP and Scoping Meeting
Date: Friday, January 26, 2018 10:19:05 AM

Dave,

The City of Monterey Park received your NOP and Notice of Scoping Meeting related to the GP and Specific Plan updates. Please be advised that based on the distance of South Pasadena from Monterey Park, the City will not be commenting on the proposal.

[redacted]

Michael A. Huntley
Director of Community and Economic Development Department
City of Monterey Park
320 W. Newmark Avenue
Monterey Park, CA 91754
Office 626/307-1315
Direct 626/307-1463

Pride in the past, faith in the future

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

February 22, 2018

EMAIL AND US POSTAL SERVICE

Mr. David Watkins, AICP
Director of Planning and Building
1414 Mission Street
South Pasadena, California 91030

Dear Mr. David Watkins, AICP:

Notice of Preparation of a Program Environmental Impact Report for
The City of South Pasadena General Plan and Downtown Specific Plan Update

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Preparation of a Notice of Preparation of a Program Environmental Impact Report for The City of South Pasadena General Plan and Downtown Specific Plan Update (Project). The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The General Plan and Downtown Specific Plan Update would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. The planning area for the Project includes the approximately 3.5 square miles, or 2,221 acres, within the incorporated City limits. The Project applies to all properties within the planning area.

Metropolitan owns and operates facilities within and adjacent to the proposed Project limits. As shown on the attached map, Metropolitan's Palos Verdes Feeder, an approximately 55-inch inside-diameter pipeline, is located along street and permanent easement right-of-way within the south-western Project boundary. Additionally, Metropolitan has fee-owned property within the Project boundary. Metropolitan is concerned with potential impacts to these facilities, rights-of-way, and fee-owned property that may result from implementation of the proposed Project.

Metropolitan must be allowed to maintain its rights-of-way and access to its facilities and properties at all times, in order to repair and maintain the current condition of those facilities. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipes to excessive vehicle, impact or vibratory loads. Any future design plans associated with this project should be submitted to the attention of Metropolitan's Substructures Team. Approval of subsequent projects should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities. Detailed prints of drawings of

Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com. To assist the City of South Pasadena (City) in preparing plans that are compatible with Metropolitan's facilities and rights-of-way, enclosed is a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California." Please note that Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's on all designs or plans submitted.

It will be necessary for the City to consider Metropolitan's Palos Verdes Feeder in its Project planning. Metropolitan requests that the City avoid any potential impacts that may occur to the Palos Verdes Feeder due to implementation of the proposed Project or, where applicable, propose mitigation measures to offset any potential impacts.

The General Plan Update states on page 82, "increased usage of MWD water," as a possible pressure and flow rate remedy. Metropolitan encourages the City to coordinate with Metropolitan and Upper San Gabriel Valley Basin Water District any changes to how it takes Metropolitan water, prior to approving any changes.

Metropolitan encourages projects within its service area to include water conservation measures. While Metropolitan continues to build new supplies and develop means for more efficient use of current resources, projected population and economic growth will increase demands on the current system. Water conservation, reclaimed water use, stormwater use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, irrigation with stormwater and reclaimed water to offset any increase in water use associated with the proposed project.

We appreciate the opportunity to provide input to your planning process and look forward to receiving future plans and documentation for this project. If we can be of further assistance, please contact Lilia I. Martínez at (213) 217-5656.

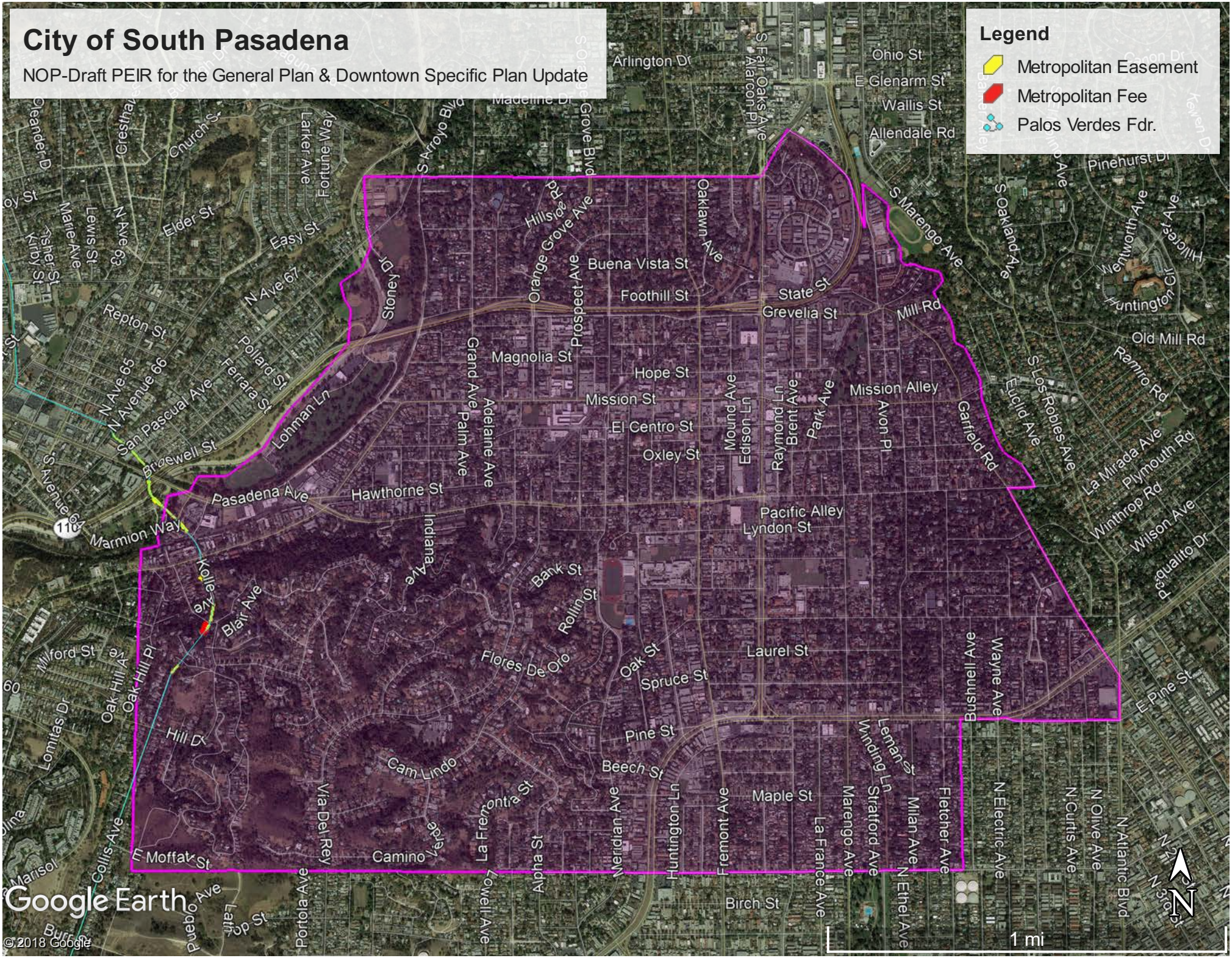
Very truly yours,

Vikki Dee Bradshaw

Vikki Dee Bradshaw
Team Manager, Environmental Planning Section

LIM/lim

Enclosures:
1) Location Map of Metropolitan's Palos Verdes Feeder within Project Limits
2) Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California


City of South Pasadena
NOP-Draft PEIR for the General Plan & Downtown Specific Plan Update
Legend
Metropolitan Easement
Metropolitan Fee
Palos Verdes Fdr.
Arlington Dr
Ohio St
E Glenarm St
Wallis St
Allendale Rd
S Fair Oaks Ave
Aarcon Pl
S Arroyo Blvd
Madeline Dr
Grove Blvd
Pinehurst Dr
S Marengo Ave
S Oakland Ave
Wentworth Ave
Huntington Dr
Hillcrest Ave
Church St
Larker Ave
Fortuna Way
Elder St
Easy St
Marie Ave
Lewis St
Kirby St
Tisher St
N Ave 63
N Ave 67
Repton St
Stoney Dr
Hillside Rd
Orange Grove Ave
Prospect Ave
Oaklawn Ave
Buena Vista St
Foothill St
State St
Grevelia St
Mill Rd
Old Mill Rd
Ramiro Rd
Pollard St
Ferrara St
N Ave 65
N Avenue 66
San Pascual Ave
Lohman Ln
Grand Ave
Palm Ave
Adelaine Ave
Magnolia St
Hope St
Mission St
El Centro St
Oxley St
Mound Ave
Edison Ln
Raymond Ln
Brent Ave
Park Ave
Mission Alley
Avon Pl
Garfield Rd
S Los Robles Ave
Euclid Ave
La Mirada Ave
Plymouth Rd
Winthrop Rd
Wilson Ave
Broadwell St
S Avenue 64
Pasadena Ave
Hawthorne St
110
Marmion Way
Indiana Ave
Pacific Alley
Lyndon St
Bank St
Rollins St
Kolle Ave
Blair Ave
Oak Hill Ave
Oak Hill Pl
Milford St
Flores De Oro
Oak St
Spruce St
Laurel St
Wayne Ave
Bushnell Ave
E Pine St
Lomitas Dr
Hill Dr
Pine St
Cam Lindo
Beech St
Maple St
Winding Ln
Stratford Ave
Leman St
Milan Ave
Fletcher Ave
N Electric Ave
N Curtis Ave
N Olive Ave
N Atlantic Blvd
Via Del Rey
Camino Real
La Fremontia St
Meridian Ave
Huntington Ln
Fremont Ave
La France Ave
Marengo Ave
N Ethel Ave
Alpha St
Lowell Ave
Portola Ave
Collis Ave
E Moffat St
Marisol
Birch St
Laurel Dr
Rubio Ave
Google Earth
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SUBSTRUCTURES
JOB LOG-IN FORM
ENVIRONMENTAL DOCUMENT INITIAL REVIEW FOR EPT

EPT JOB NO.: NUMBER NUMBER **SUBSTR JOB NO.: NUMBER**

DATE RCVD: DATE **DATE EPT RCVD: DATE** **DATE DUE: DATE**

PROJECT NAME: INSERT

DOCUMENT TYPE: INSERT

RECEIVED FROM: INSERT

MWD FACILITY/STA.: PIPELINE NAME HERE

PIPELINE SIZE: INSERT

FEE: Y **EASEMENT: Y** **PUBLIC R/W: N**

PREVIOUS LTR: ENVIRONMENTAL DATE(S): DATE

SUBSTRUCTURES DATE(S): DATE

SERVICE AREA/WSO TEAM: INSERT Team

SUBSTRUCTURES COMMENTS: COMMENTS

REQUIRED ACTION OR MISCELLANEOUS INFORMATION: COMMENTS

LETTER SENT YES / NO DATE: DATE

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710

Edmund G. Brown Jr., Governor

February 1, 2018

David Watkins
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Sent via e-mail: dwatkins@southpasadenaca.gov

RE: SCH# 2018011050; South Pasadena General Plan and Downtown Specific Plan Update Project, City of South Pasadena; Los Angeles County, California

Dear Mr. Watkins:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws**.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
   d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
   a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

    This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have been already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714

cc: State Clearinghouse

SCAG
INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

February 23, 2018

Mr. David Watkins, AICP, Director of Planning and Building
City of South Pasadena
1414 Mission Street
South Pasadena, California 91030
E-mail: dwatkins@southpasadenaca.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Program Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan Update [SCAG NO. IGR9517]

Dear Mr. Watkins,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.[1] SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Program Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan Update. The proposed project includes a citywide General Plan update for the 2040 horizon year and an update of the Downtown Specific Plan.

When available, please send environmental documentation to *SCAG's office in Los Angeles or by email to au@scag.ca.gov* providing, at a minimum, the full public comment period for review. Please note our new headquarters in Downtown Los Angeles is at *900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017*.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang

Ping Chang
Acting Manager, Compliance and Performance Monitoring

[1] Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE SOUTH PASADENA GENERAL PLAN AND DOWNTOWN SPECIFIC PLAN UPDATE [SCAG NO. IGR9517]

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*
RTP/SCS G3:	*Ensure travel safety and reliability for all people and goods in the region*
RTP/SCS G4:	*Preserve and ensure a sustainable regional transportation system*
RTP/SCS G5:	*Maximize the productivity of our transportation system*
RTP/SCS G6:	*Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)*
RTP/SCS G7:	*Actively encourage and create incentives for energy efficiency, where possible*
RTP/SCS G8:	*Encourage land use and growth patterns that facilitate transit and active transportation*
RTP/SCS G9:	*Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies**
	**SCAG does not yet have an agreed-upon security performance measure.*

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS		
Goal		Analysis
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
etc.		etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of South Pasadena		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	26,000	26,700	27,100
Households	6,458,000	7,325,000	7,412,300	10,600	10,900	11,100
Employment	8,414,000	9,441,000	9,871,500	9,900	10,200	10,500

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:
dwatkins@southpasadena.gov
David Watkins, AICP
Director of Planning and Building
1414 Mission Street
South Pasadena, California 91030

February 15, 2018

Notice of Preparation of an Environmental Impact Report for the City of South Pasadena General Plan and Downtown Specific Plan Update

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send the SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include emission calculation spreadsheets and modeling input and output files (not PDF files)[1]. Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993).

SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

[1] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP[2] is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. Guidance[3] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

The SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations

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[2] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

[3] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, emissions from the overlap construction and operational activities should be combined and compared those emissions to SCAQMD's regional air quality operational thresholds to determine the level of significance.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits
In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. For more information on permits, please visit the SCAQMD webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources
SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (http://www.aqmd.gov).

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC180202-01
Control Number

Better Space, Inc.

315 S. Beverly Drive, Suite 310
Beverly Hills, California 90212

February 21, 2018

David G. Watkins
Director of Planning and Building
City of South Pasadena
City Hall
1414 Mission Street
South Pasadena, California 91030

Re: **"Former Tyco Site"**
South Pasadena General Plan and DTSP

Mr. Watkins:

We want to thank you for implementing a thorough process for the opinions and concerns of the involved property owners and community to be heard.

As you know, we are owners of an approximately 3.5 acre site which is comprised of various parcels along Pasadena Avenue and Arroyo (see attachment, the "Tyco Site"). After our acquisition and environmental clean-up the site was master leased with the intent of creating a "tech center." This met with very limited success because of the high local cost of power/electricity. In addition, the repurposing of the existing, arguably obsolete, structures which were specifically built for Tyco and its predecessor has not been well received by prospective commercial tenants who demand different more efficient and user-friendly configurations. Finally, market demand and rental rates, validated over the 12 years of our ownership, have not supported the long term exclusively commercial use of our entire property.

We are therefore in agreement with the Proposed Land Use Map insofar as it gives the Tyco Site a mixed-use designation. However, the primary focus of this letter is to differentiate our site from the rest of the "Ostrich Farm" by way of a sub-designation (ex. MIXED-USE2 or MU2) which will better address existing conditions, community concerns, and development feasibility.

On the attachment you can see that of the total 3.5 acres, approximately 1 acre we own along Arroyo Drive is already designated Residential. We request that given the current residential

nature of Arroyo Drive and its relatively quiet isolation from the Pasadena Avenue side, that this area and the transitional area south of it should be residential and that the allowed density be increased to allow for approximately 100 units on our property along/mostly along Arroyo Drive.

As to our property along Pasadena Avenue, part of it sits across from existing small retail (near Hawthorne Street) and may well be suited to creating a small retail cluster, approximately 2500-5000 sf, by that corner. Any further retail may not be feasible given the 'divide' created by the rail and 'octopus intersection' with Pasadena Avenue and Monterey Road. This divide and separation is also a condition which should strongly factor in differentiating and distinguishing the Tyco Site from the rest of the Ostrich Farm.

As to commercial use for our property, based on our experience in the local market we believe that some office and flex-space may be desirable and feasible. This may be best suited along Pasadena Avenue and approximately 35,000 to 50,000 sf may possibly be included in a revised mixed-use site plan.

Given the proximity to the Gold Line and bus service, the current 4:1000 parking ratio should also be adjusted significantly downward and allow for mitigation and offsets to parking requirements.

It is worth highlighting that our position is that the added high-quality residential density we propose to introduce to the site will be the driver for the retail and commercial components for the contemplated mixed-use (MU2) and we hope that the City agrees.

We therefore request that as part of the EIR for the City of South Pasadena General Plan Update our property should be considered for up to 100 residential units, up to 5000 sf of retail, and up to 50,000 of office/commercial/flex space. In order to achieve the foregoing, we request that a more appropriate "MIXED-USE 2" designation - perhaps in concert with the existing residentially designated portion - be placed into the Land Use Map for the City of South Pasadena General Plan Update.

Feel free to contact me at mhtambor@sbcglobal.net or 310-739-7036 should you or any staff or consultant wish to discuss this further. Thank you for your consideration.

Very truly yours:

Matthew Tambor
President, Better Space, Inc.

cc: Kaizer Rangwala, Rangwala Associates


5313 | 11
SHEET 1
SCALE 1" = 100'
The assessment of units in the following Condominium Plans, includes all rights and interests in the common areas as set forth in deeds of record.
Condominium Plan Reference | Common Area Tract No. | Lots | Units | Subdivision of Airspace
#366760 4-11-80 | 34615 | 1 | -- | Sheet 2
2003
3.5 Acre "Tyco Site" Boundary
Historically Residential Portion of Site (.9 acres)
ARROYO DR.
PASADENA AVE.
HAWTHORNE ST.
RAILROAD ALLEY
MONTEREY RD.
BK. 5311
DETAIL NO SCALE
CODE 9030
CONDOMINIUM TRACT NO. 34615 M.B. 934-64-65
LINCOLN PARK M.R. 6-358-359
SAN GABRIEL ORANGE GROVE ASSN'S. LANDS M.R. 32-47-50
TRACT NO. 201 M.B. 13-153
RECORD OF SURVEY R.S. 78-67
FOR PREV. ASSM'T SEE 5313 - 23
ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.

SANTA CLARITA

City of South Pasadena General Plan and Downtown Specific Plan Update
Scoping Meeting
South Pasadena Community Room
February 5, 2018, 7:00 PM

COMMENTS:

Previous GP discussions assumed that car traffic would decrease & public trans would increase. Recent statistics state the reverse. It would appear that it would be at least 10 yrs before a proper mix is achieved and any traffic analysis should consider this with the growth #'s being investigated.

Also, water usage per capita and its trend should be known or available (including business & residential (multi & single)). Considering environmental risk of supply, what will be the max per capita usage allowed and how does that fit in with the growth goals?

Name: HARRY KNAPP

Address: 417 EL CENTRO VT

E-Mail: _

SUBMITTED: HARD COPY AND E-MAIL TRANSMITTAL

Mr. David Watkins, AICP
Director of Planning and Building
City of South Pasadena, City Hall
1414 Mission Street
South Pasadena, CA 91030

February 20, 2018

Subject: **South Pasadena General Plan and Downtown Specific Plan Updates: Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR)—Comment Letter**

Dear Mr. Watkins:

Here are my comments in response to the city's NOP and Scoping Meeting:

1. Since no Initial Study/Environmental Checklist was prepared with the NOP (nor is one required), the Draft EIR will have to present an analysis for all environmental categories identified in Appendix G of the *State CEQA Guidelines* (even for those categories determined to have no impacts). These comprehensive effects analyses will also be carried out for each alternative, though at a broader level, than the updates. The Initial Study aids in focusing on more important categories and dispensing with ones that are not. Hence with no Initial Study, the Draft EIR will contain numerous pages, perhaps one thousand or more to ensure legal and technical accuracy. Please extend the public review period for the Draft EIR beyond the minimum 45-day period. The city anticipates a release date in the summer. The length of this major city planning document and the timing of its release are two important factors that underscore a longer public review period. A great deal of time has been afforded to the planners and consultants on preparing this document, it is only fair and reasonable to accord the public and decision makers more time to review and comment accordingly.
2. During the scoping meeting, the EIR consultant mentioned two concepts in the CEQA process in a simplistic manner: baseline conditions and the no project alternative.
    a. The *State CEQA Guidelines* are currently written that baseline conditions (i.e., environmental setting at the time the environmental planning process begins for a proposed development) are <u>normally</u> set at the time the NOP is published. However, with current case law, the Governor's Office of Planning and Research (OPR) is in the process of updating the definition of what constitutes baseline conditions (refer to opr.ca.gov/updates/guidelines/). Pages 92-97 of that OPR document detail the opportunity for lead agencies to consider when it is appropriate to carry out exceptions to the "general rule" and instructions for using alternative baselines. In some environmental categories, it makes perfect sense to use the general rule of when the NOP is published coupled with an alternative baseline that is explained and documented with substantial evidence. Examples for conducting alternative baselines could be the city's water supply and transportation impacts to avoid overstating significant impacts. These proposed guidelines reflect what is already mandated via published legal cases. So, the city should consider this helpful guidance in developing baseline conditions by reviewing the proposed changes to Section 15125 of the *State CEQA Guidelines*.
    b. Contrary to statements made during the scoping meeting, the "no project" alternative is not always the environmentally superior alternative. Yes, it may have potentially fewer construction impacts than the plan updates, however, in the long term, only extending current policies and practices into the future may

result in greater impacts to the city and surrounding areas. Before making a statement of this kind, the city should have the (feasible) CEQA alternatives analysis conducted first.

3. With respect to alternatives, aside from reduced density alternatives (which may be infeasible from an economic standpoint to developers), the city can consider staging developments and making good faith assumptions that latter stages may not be possible, if say, there is insufficient water supply to support such development. Or another potential alternative is redirecting or focusing the growth in one location of South Pasadena over the other, such as focusing on improving Fair Oaks Avenue over that of Mission Street. There are possible alternatives, some of which that may be infeasible. But, if possible, it would be helpful for the public to learn about potential alternatives to the plan updates now under consideration and prior to the release of the Draft EIR.
4. Transportation is a significant issue amongst the citizens of South Pasadena. I have attached my recent letter to the city regarding the difficulties of driving along Meridian Avenue, a collector street, between Monterey Road and Kendall Avenue. The letter is quite comprehensive on the disparities between streets in terms of traffic control. Part of the general plan and specific plan updates, along with the Draft EIR, need to address significant traffic issues on collector roads that receive high levels of cut through traffic that will be further exasperated with the additional planned residential units and commercial uses proposed. Clearly, a mitigation program on traffic calming and redirection to arterial streets need to be part of the updates and EIR process to alleviate significant and even more severe traffic and circulation problems.
5. While the city states that there will be no zoning changes outside of the updates, I respectfully request the city to include in the general plan updates a time table on when the special residential zoning designation associated with the now dead Caltrans surface route for the proposed 710 route closure will be removed. Please refer to my attached letter on pages 12-13 for more information on this matter.

As always, I appreciate the city's efforts on moving forward with updating the general and specific plans. I also appreciate being part of this process via the Core Group and Natural Community Working Group.

Thank you.

Sincerely,

Delaine W. Shane

Delaine W. Shane

Attachment

October 13, 2017

Subject: **Meridian Avenue: Recommendations for the City of South Pasadena's General Plan Update Process regarding Traffic, Circulation, and Zoning**

Dear Honorable Mayor Cacciotti and Honorable City Council Members:

With the current General Plan Update process now underway, re-examining the approximately one-mile stretch of Meridian Avenue, from Monterey Road to Kendall Avenue, in terms of traffic, circulation, and zoning, would be deeply appreciated by a number of South Pasadena residents. For several decades, this portion of Meridian Avenue has been treated as the unofficial gateway to access State Route 710. Those motorists wanting to avoid the traffic congestion on Monterey Road, Fremont Avenue and Fair Oaks Avenue use Meridian Avenue as their "escape" route.

Residents who live in this historic neighborhood have endured an ever increasing number of vehicular traffic that has been disruptive to an otherwise quiet residential area of South Pasadena. In 2014, the City's traffic study found the Average Daily Traffic (ADT) on Meridian Avenue between Monterey Road and Oak Street was 7,541 vehicles per day (vpd) and that the ADT on Meridian between Oak Street and Kendall Avenue was 6,329 vpd. These ADT values are significantly higher when compared with other collector roads analyzed in 2014 (e.g., 1,433 vpd for Hill Drive and 4,769 for Via Del Rey). The high speeds by "cut through" vehicles, coupled with the blind curves and general narrowness of Meridian Avenue, pose increasing hazards to school-age children, residents, and visitors.

Six recommendations below deserve consideration in the General Plan Update process. Further details and specific goals related to each recommendation are elaborated in the attachment to this letter.

1. Establish a 15-mile-per-hour prima facie speed limit for a distance of up to 500 feet in each direction from the South Pasadena High School entrance on Meridian Avenue.
2. Conduct a new traffic survey of Meridian Avenue for both total daily vehicle counts and speeds (especially during AM and PM peak periods) in light of the recent improvements and ongoing construction along Monterey Road, and determine what percentage of this traffic is "cut-through traffic" to State Route 710.
3. Re-examine Meridian's status as a collector street to determine if money for traffic calming or traffic control strategies can be partially paid through Measure M funds.
4. Update the 2017 Complete Street Policy Resolution wherein ALL Meridian Avenue users (including residents whose properties are adjacent to or on streets that immediately lead to Meridian Avenue) are served in an equitable manner.
5. Develop a traffic calming program for Meridian Avenue, and implement traffic calming measures to maintain and enhance health, safety, and livability for this particular community in the City of South Pasadena.
6. Remove the zoning designation and disclosure requirements for private properties along the now defunct Meridian Surface Alignment/Meridian Variation Alignment for State Route 710 (formerly Route 7).

Thank you.

Sincerely,

/s/Delaine W. Shane

Delaine W. Shane

Attachment

Attachment to Letter: Meridian Avenue Recommendations on Traffic, Circulation, and Zoning

Recommendation No. 1:

Establish a 15-mile-per-hour prima facie speed limit for a distance of up to 500 feet in each direction from the South Pasadena High School entrance on Meridian Avenue

Comment

Many motorists do not obey the 25 miles per hour (mph) speed limit on Meridian Avenue, notwithstanding findings in the City's three-year-old traffic survey. The 2014 Minagar & Associates traffic study used combined speed data (for both north- and south-bound vehicles) on Meridian Avenue at 10:45 am (on a Tuesday) and at 11 am (on the following Wednesday). By combining the directional data (north- and south-bound) and conducting the study during off-peak traffic periods, the results vastly underestimate the true magnitude of speed that is typical along Meridian Avenue. It was noted in that same traffic study that vehicles traveling along Monterey Road generally travelled between 39-40 mph (at the 85th Percentile Speed) and higher while the posted speed is 35 mph. Why would one assume that people driving above the speed limit on Monterey Road, would suddenly obey the speed limit when turning south onto Meridian Avenue or when traveling north on Meridian Avenue from Kendall Avenue from Huntington Drive (40 mph posted speed limit), especially during rush hour traffic?

Individuals are at risk when using South Pasadena High School's track and field via the cross-walk at Meridian Avenue on Bank Street or walking north of Bank along Meridian Avenue during the afternoons and early evenings. Also, residents along Meridian Avenue between Monterey Road and Rollin Street, whose driveways lead to Meridian Avenue, must contend with blind curves besides speeding cars to access their driveways (which can be short).

Goal

- Reduce the speed limit from the Monterey Road/Bank Street stretch along Meridian Avenue to permit safe passage for pedestrians (in particular, students) accessing the high school's track and field in the afternoon and evenings, and to allow those residents to use their driveways without feeling vulnerable to collisions.

Details

- *South Pasadena Municipal Code*, Chapter 19 (Motor Vehicles and Traffic), Article I (General), Section 19.3-1(b)(1) (Speed Limits): "Fifteen miles per hour for a distance of up to five hundred feet from a school site." Caveats and conditions placed on this speed limit allow for the city's interpretation of this code section including compliance with the State's Vehicle Code.
- General Observation: Reflective signage is posted at intervals of the two curves of Meridian Avenue going south from Monterey Road to Bank Street (roughly 500 feet) either indicating a 25 miles per hour speed limit or an upcoming pedestrian crossing (a Zebra striped crossing at Bank Street). Signage is found along Meridian Avenue going north from Braewood Court to Bank Street. Many motorists are ignoring the speed limits (personal observation). Occasional police enforcement has had no lasting effect on speeding (personal observation).
- General Facts: Access to the high school from Meridian Avenue is primarily for use of the track and field. High school students utilize the track and field during and after school hours. Band practice and drill routines occur usually after school hours, and residents typically use the track in the early evening. The community accesses this part of the school for graduations, sports events, and Fourth of July celebrations.
- From the Minager & Associates 2014 Traffic Study, Table 3 (Traffic Counts): Between Monterey Road and Oak Street, the Average Daily Trip (ADT) on Meridian Avenues was 7,541 vehicles per day (vpd), and between Oak Street and Kendall Avenue on Meridian Avenue, the ADT was 6,329 vpd. These values are substantially higher than those values recorded for other collector streets in South Pasadena in 2014.

Recommendation No. 2:

Conduct a new traffic survey of Meridian Avenue for both total daily vehicle counts and speeds (especially during AM and PM peak periods) in light of the recent improvements and ongoing construction along Monterey Road, and determine what percentage of this traffic is "cut-through traffic" to State Route 710

Comment

The purpose of the 2014 Minagar & Associates traffic study was to determine whether posted speed limits on selected roadways in South Pasadena were valid or required updating. While the mechanical ADT results from that study are of interest, the radar speed study appears not to be structured for assessing high speeds during high demand usage, when drivers are clearly in a hurry and want to "beat the traffic." Additionally, the post-2014 improvements along Monterey Road, including a dedicated turning lane leading vehicles to travel south onto Meridian Avenue, benefit Monterey Road. By allowing more cars to turn south onto Meridian Avenue before the light changes, congestion and potential blockage of the Monterey/Meridian intersection by "trapped" motorists is substantially reduced. However, this benefit leads to an indirect, adverse impact on the Meridian Avenue stretch to Kendall Avenue, causing faster pacing of closely "packed" or tail gating vehicles with increased speeds. A new traffic survey, whose purpose would be to measure current counts and speed conditions during peak- and off-peak traffic conditions, would provide important information needed to recommend appropriate traffic calming and/or traffic controlling measures for the entire one mile stretch of Meridian Avenue (between Monterey Road and Kendall Avenue). The traffic study could also quantify the percentage of vehicles that are cut-through traffic with the intent of securing funding through Metro and/or other governmental agencies for traffic calming measures for Meridian Avenue.

Goals

- Carry out a new traffic study of Meridian Avenue that details, at a minimum, ADT, speed, and cut-through traffic during AM and PM peak periods to formulate a traffic calming plan for this street.
- Compare new ADT values with those of the 2014 traffic study values in light of the recent improvements and ongoing construction along Monterey Road, including the protected left turn lane that allows for more cars to turn onto Meridian Avenue to travel south. This information could be helpful in determining indirect impacts to collector roads when arterial roads are improved and develop mitigation, as needed.

Details

- The City's 2014 traffic study did not indicate what kind of radar equipment was used on page 1 of the report other than speed was measured by: "...radar or other speed measuring device." As noted by the Federal Highway Administration: "The selection of equipment to collect speed data should consider the fact that some technologies are particularly well suited for reporting individual vehicle speeds (that is tracking how fast each specific vehicle is moving), while others are designed to provide average facility speed over a given reporting interval. Although both data represent speed information, the usefulness of those data is very different....How the speed data is collected is as much a function of the equipment connected to the sensor as it is of the sensor technology itself." See: https://www.fhwa.dot.gov/policyinformation/tmguide/tmg_2013/traffic-monitoring-theory.cfm. Because the 2014 study had a particular goal (determining if posted speed limits were being met), it lacks vital information in demonstrating the true speeds that are achieved by many motorists traveling along Meridian Avenue.
- The study is over three years old and is thus "stale." Conditions have changed regarding the facilitation of traffic being directed from Monterey Road and onto Meridian Avenue. Additional traffic upgrades that might be recommended through the General Plan process may have indirect significant impacts to Meridian Avenue.

Recommendation No. 3:

Re-examine Meridian's status as a collector street to determine if money for traffic calming or traffic control strategies can be partially paid through Measure M funds

Comment

The existing South Pasadena General Plan defines collector streets as follows (Circulation & Accessibility Element-Amended February 2001, Chapter III, page III-3):

> "Collector streets are intended to carry traffic between residential neighborhoods and the arterial street network. They are generally two and four-lane roadways that have a mixture of residential and commercial land uses along them. Average daily traffic volumes on collector streets are generally between 2,000 and 6,000. Higher density residential land uses or side yards of single-family homes may be located adjacent to collector streets. Higher traffic volumes may be acceptable on certain collector streets such as those fronting commercial uses."

Meridian Avenue is identified as a collector road in the existing general plan (from Oliver Street to south city limit). While commercial uses do front Meridian Avenue north of Monterey Road, Meridian Avenue south of Monterey Road is strictly residential with the exception of the high school's track and field facility.

Goal

- Consideration should be given as to how Meridian Avenue (particularly south of Monterey Road) is reclassified during the General Plan Update. If the same classification scheme remains, isn't it better to differentiate Meridian Avenue, south of Monterey Road as either a major collector road or a sub-arterial road to seek funding from Metro, Caltrans, and/or FHWA for traffic calming/control measures?

Details

- Meridian Avenue has been known unofficially as the Gateway to the 710. If it is true that a number of cut-through traffic is associated with this road's unofficial moniker, then Meridian Avenue should be better managed via traffic calming and/or controlling measures that rightly should be funded through the recently approved Measure M bond and possibly through grants associated with state or federal transportation funds. The rationale for seeking such funds would be to mitigate traffic impacts experienced on Meridian Avenue which in turn has provided as an alternative to the already congested Fremont Avenue/Huntington Drive intersection (that is part of the Los Angeles County's Congestion Management Program) for those drivers heading towards State Route 710 in Alhambra.
- Modified from Table 3 of the 2014 Minagar & Associates traffic study, mechanical counts were made for key collector streets (see table on next page). As observed from the modified table, the only collector road that exceeds the typical mechanical ADT count identified in the existing general plan is Meridian Avenue, south of Monterey Road to the southern City limit at Kendall Avenue.

Recommendation No. 3:—CONTINUED

Re-examine Meridian's status as a collector street to determine if money for traffic calming or traffic control strategies can be partially paid through Measure M funds

Collector Roads in South Pasadena studied in the 2014 Minagar & Associates Traffic Study

Name of Collector Road	Segment Limits for Each Collector Road		Length (mile)	2014 Average Daily Traffic Measured (vehicles per day)
Alpha Avenue	Camino Lindo	Kendall Avenue (South City Limit)	0.48	2,860
Arroyo Drive	Columbia Street (North City Limit)	Pasadena Avenue	0.95	2,055
Camino Del Sol	Hill Drive/ St. Albans Avenue	Via Del Rey	0.39	1,468
Camino Lindo	Flores De Oro	Alpha Avenue	0.20	1,936
El Centro Street	Pasadena Avenue	Meridian Avenue	0.60	4,256
El Centro Street	Meridian Avenue	Fair Oaks Avenue	0.40	4,276
Flores Del Oro	Via Del Rey	Alpha Avenue	0.06	2,057
Grand Avenue	Columbia Street (North City Limit)	Mission Street	0.57	3,135
Hill Drive	West City Limit	Camino Del Sol/St. Albans Avenue	0.41	1,433
Marengo Avenue	Mission Street	Oak Street	0.54	2,585
Marengo Avenue	Oak Street	W. Alhambra Road (South City Limit)	0.63	2,665
Meridian Avenue	Oliver Street	Mission Street	0.50	2,561
Meridian Avenue	Mission Street	Monterey Road	0.26	4,400
Meridian Avenue	Monterey Street	Oak Street	0.47	7,541
Meridian Avenue	Oak Street	Kendall Avenue (South City Limit)	0.49	6,329
Milan Avenue	Mission Street	Huntington Drive	0.80	2,089
Oak Street	Meridian Avenue	Fair Oaks Avenue	0.43	2,859
Oak Street	Fair Oaks Avenue	Garfield Avenue (East City Limit)	0.81	3,514
Oliver Street	Orange Grove Avenue	Meridian Avenue	0.06	2,174
Oxley Street	Diamond Avenue	Marengo Avenue	0.54	2,994
San Pascual Avenue	Columbia Street (North City Limit)	Stoney Drive/San Ramon Drive (West City Limit)	0.25	1,800
Via Del Rey	Monterey Road	Flores Del Oro	0.42	4,769
Via Del Rey	Flores Del Oro	Camino Verde	0.80	2,840

Recommendation No. 4:

Update the 2017 Complete Street Policy Resolution wherein ALL Meridian Avenue users (including residents whose properties are adjacent to or immediately lead to Meridian Avenue) are served in an equitable manner

Comment

The existing city's general plan has a number of goals and policies (starting on page III-20 of the Circulation & Accessibility Element, as amended February 2001) that propose to address traffic and circulation problems in South Pasadena. However, such strategies do not include residents whose properties are either adjacent to or on local streets that lead to Meridian Avenue. For us, accessing our driveways (either leaving or entering our properties) can be frustrating at best or downright scary at worst. Imagine having to maneuver your car around parked cars and trucks while backing out (and of course not hitting pedestrians or bicyclists) into a busy narrow street where drivers do not obey the speed limit.

I've already witnessed two auto accidents and several near misses since living at my home as of mid-2014. When entering or leaving via the driveway, I always hope that my car won't get rear-ended or t-boned. Waiting for it to be all clear (i.e., no traffic in all three directions) is useless, because most times at least one vehicle is passing by my home. When I see the approaching vehicles, it is too late to back out completely into the street, as they are moving too fast. Photos below and on the next pages illustrate my particular challenge of traffic going north or south on Meridian Avenue, as well those vehicles turning from Maple Street and traveling south on Meridian Avenue. I don't even try to back out and go north on Meridian Avenue from my driveway because of the traffic volume and speeds, I must always go south on Meridian Avenue to either Kendall Avenue or turn right on Valley View Road and take a circuitous route through Monterey Hills to get back to Monterey Road. Neighbors along and near Meridian Avenue have their own unique challenges accessing their driveway. I'm using my own experience as an example for your further understanding. I have tried to make it humorous. But, please make no mistake about this situation, it is a nightmare. I just choose to find the dark humor in this rather than be angry.

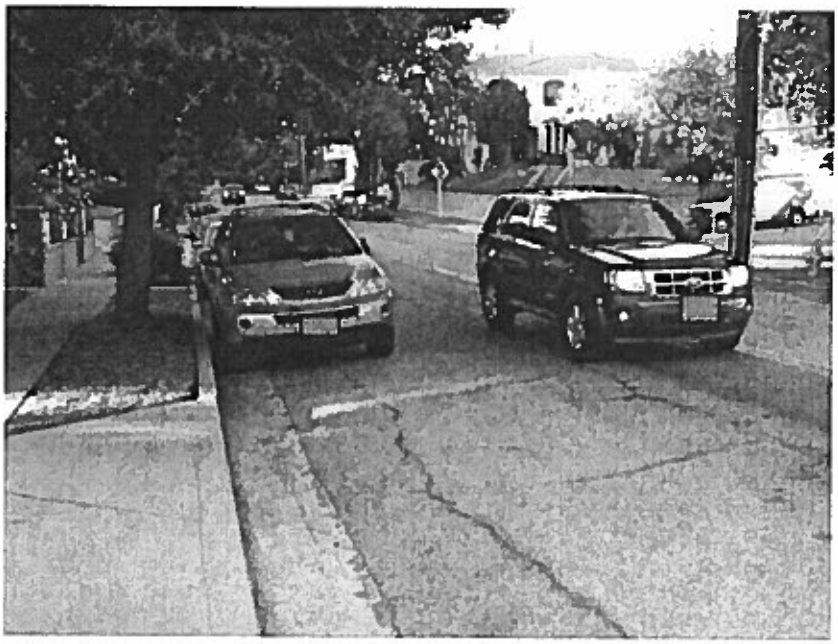
This is my driveway leading to Meridian Avenue. Barriers to my "line of sight" vision and my ability to maneuver when backing out onto the street include cars or large trucks parked in front of my house (as barely shown left on this picture) and cars and trucks (or occasionally RVs) parked to the south of my driveway (as shown right on this picture), as well as the cars parked directly opposite to my house on the other side of the street.

There are just two lanes that make up Meridian Avenue. Please note that the roadway itself is just 32 feet wide. So, each lane is about 16 feet wide. My car is a bit over 15 feet long, so once I barely leave my driveway, my car is already blocking both lanes. I must drive out at an angle into the street to avoid scrapping the bottom of my car by the high angled apron of the driveway. Furthermore, I have to avoid striking pedestrians, bicyclists, and look over these various parked vehicles, and then contend with the fast and furious cross traffic, especially at peak hours traveling north- and south-bound on Meridian Avenue, as well as guessing which way the cars on Maple Street will be turning. There is a single stop sign posted on Maple Street, but not on Meridian Avenue.

Recommendation No. 4:---CONTINUED

Update the 2017 Complete Street Policy Resolution wherein ALL Meridian Avenue users (including residents whose properties are adjacent to or immediately lead to Meridian Avenue) are served in an equitable manner

When I'm backing out, this is my view looking north on Meridian Avenue. As I continue to back out slowly from my driveway, my vision is blocked by these parked vehicles. I must be extremely careful after that as once I see cars coming around the bend (i.e., at Beech Street) then there is no more time and I have to back up into the driveway again or risk an accident or an encounter with a potentially angry motorist for "blocking" the flow of traffic.

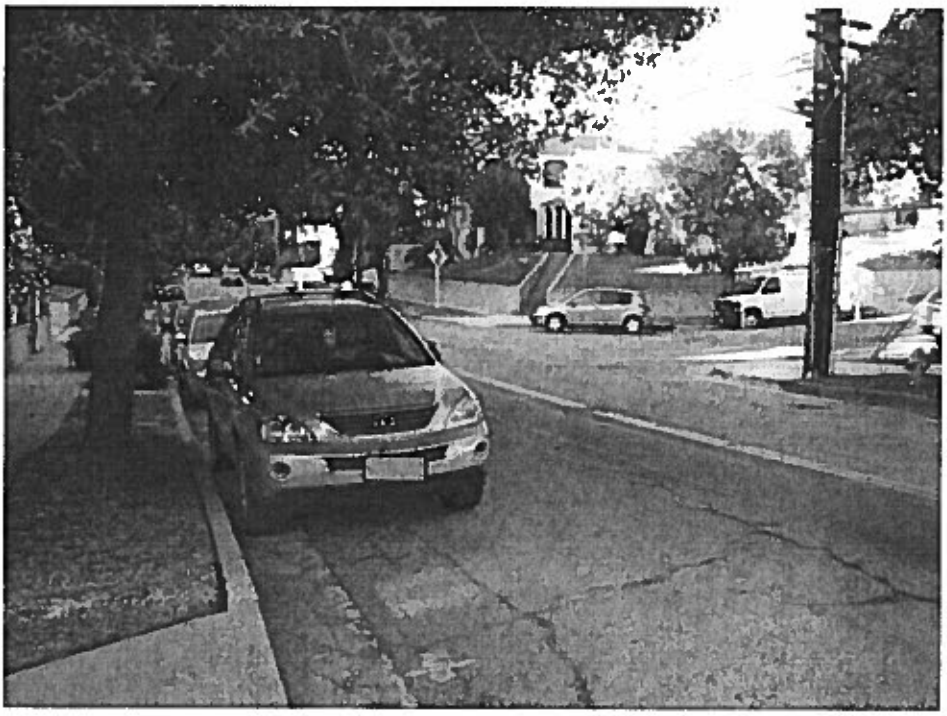


Oops! Too late. I need to back up and let this SUV pass. I'll need to start over again, but I can see another car coming from around the curve again (has its headlights on at least). Will that next car pass my house or will it make a left turn onto Maple Street at the last moment? Most times, the motorists don't even bother to signal. If they are turning, that is my chance to leave the driveway. But, if they don't signal, I can't risk leaving the driveway. This is so frustrating and dangerous!

Recommendation No. 4:—CONTINUED

Update the 2017 Complete Street Policy Resolution wherein ALL Meridian Avenue users (including residents whose properties are adjacent to or immediately lead to Meridian Avenue) are served in an equitable manner

But, wait! When I look to the south from my driveway, here come two more cars traveling north on Meridian Avenue. From my vantage point from the driveway, the roadway going south dips downwards and I really can't see the cars coming from that direction and heading north until they are almost at Bonita Drive. Thank goodness that there is at least a stop sign on Bonita Drive—just too many directions to consider here. Still, I'm stuck again. I can't leave the driveway. And through this all, I have to continue to scan for pedestrians and bicyclists.



Back to looking northward to see what traffic is heading in a southerly direction. Oh, there's a car at Maple Street. Is it turning right or left (towards me)? Have to wait and see...darn, it turned right and is heading up towards Monterey Road, and I missed my chance because after this photo was taken another car was traveling south towards me. Will I ever leave? Or will I run out of patience and try to enter and pray I don't get hit or get a honk from an irate motorist. If only they obeyed the speed limit, I might be able to get out of the driveway...eventually.

Recommendation No. 4:---CONTINUED

Update the 2017 Complete Street Policy Resolution wherein ALL Meridian Avenue users (including residents whose properties are adjacent to or immediately lead to Meridian Avenue) are served in an equitable manner

Governor Schwarzenegger signed into law the California Complete Streets Act of 2008 (i.e., as amending Sections 65040.2 and 65302 of the Government Code) that requires cities and counties, when updating their general plans, to ensure that local streets and roads meet the needs of all users. On January 18, 2017, the South Pasadena City Council adopted the Complete Streets Policy Resolution No. 7497.

While this resolution does state equitable treatment for all users, it really isn't explicit about residents' roles in this new process, especially for those residents with properties on or adjacent to highly traveled roads like Meridian Avenue. The resolution needs to be updated to explicitly state that all users, including those residents impacted by heavily-used roads. In the case of Meridian Avenue, residents are a subset of motorists who access it. Pedestrians, young and old alike, have to be very careful crossing segments of the roadway that have no intersection markings. Young people who are way too attentive on their electronic devices and not their surroundings are at greater risk of getting hurt when crossing this street.

Goals

- Adopt the following goals in the General Plan Update that can apply to all streets in South Pasadena:

    a. Preserve health and safety, and strengthen the integrity of neighborhoods and districts, by protecting local streets from cut through traffic, speeding, and traffic congestion by implementing traffic calming measures.
    b. Establish a safe, balanced, and efficient circulation and pedestrian system serving all segments of the community (including residents whose driveways are adjacent to streets with heavy traffic volume), preserving the City's small town character and quality of life, and planning for anticipated growth.
    c. Develop a traffic calming program, and implement traffic calming measures, where appropriate and feasible, to minimize the impacts on the use of local streets by vehicular traffic and to maintain/enhance health, safety, and livability of the neighborhoods.

Details

- Perhaps the best comparison on how the City has handled traffic issues prior to the new resolution for Complete Streets Policy is to examine the unequal treatment between Meridian Avenue and Via Del Rey. Back in the 1970s, the City of South Pasadena permanently blocked the connection between the City of Los Angeles's Van Horne Avenue from Via Del Rey. The subsequent lawsuit is summarized in a decision that can be found at the end of this attachment. I am not recommending the closure of Meridian Avenue, but I am pointing out the legal arguments the City of South Pasadena presented to accomplish a successful outcome in the litigation proceedings. Some of the arguments, sadly, seem to be code for racism or elitism; however, that aside, the exposure of ever increasing traffic and speed does have similar impacts that Meridian Avenue residents who own or live in historic "quality" homes rightly experience now but for which are not now being remedied by the City:

    '(a) That Via del Rey is no longer needed and never has been needed as a conveyor of through traffic, rather such street is needed and has always been intended to serve as a collector of residential and residentially related traffic in the Altos de Monterey community of this City, and the carriage of substantial through traffic is inconsistent with and inimical to that intended use in that such traffic detracts from the peace, safety and livability of the residential environment of said community;

Recommendation No. 4:---CONTINUED

Update the 2017 Complete Street Policy Resolution wherein ALL Meridian Avenue users (including residents whose properties are adjacent to or immediately lead to Meridian Avenue) are served in an equitable manner

> '(b) That if Via del Rey is not closed to through traffic, a substantial and increasing volume of such traffic may be expected to use Via del Rey solely as a through street. Such volume of through traffic is in excess of the volume of incidental through traffic foreseen when Via del Rey was designed, and is inimical to the fine residential environment which it has always been a public purpose of this City to establish and foster in Altos de Monterey;
>
> '(c) That at the time of the subdivision of the 'Altos', a commitment was made by this City Council to close Via del Rey to through traffic as soon as practicable;
>
> '(d) That Via del Rey is a residential street of quality homes now carrying an excessive volume of auto traffic;
>
> '(e) That such excessive traffic is replete with hazard, noise, pollution, speed, accidents and other ramifications inimical to the peace, safety and welfare of the neighborhood in and around Via del Rey and Camino Verde;
>
> '(f) That such problems have caused a diminution of property values in such area;
>
> '(g) That such traffic is not primarily caused by residents but rather as a through way and shortcut for people living substantial distances from this residential area;
>
> '(h) That the closure of Via del Rey at Camino Verde would substantially reduce the police problems at such area without substantially damaging any property owner or without requiring excessive circuitry of travel by the public; and
>
> '(i) That such closure of Via del Rey would be a proper exercise of the police power.

Understandably, there are differences between the buildout of Monterey Hills and the old historic neighborhoods along Meridian Avenue. However, the volume of traffic for Meridian Avenue is substantially higher than that was ever experienced by Via Del Rey. And yet, there are a number of traffic control measures employed along Via Del Rey and far, far less for Meridian Avenue.

- There are rumors that the only way (for example) that a stop sign could be added on Meridian Avenue is if there was a traffic fatality. I hope that this rumor is simply that and not a criterion for traffic calming measure. And, again, I am not recommending a particular type of control or calming measure. That is really for a qualified traffic engineer to assess after a new and well-designed traffic study has been performed.

Recommendation No. 5:

Develop a traffic calming program for Meridian Avenue, and implement traffic calming measures to maintain and enhance health, safety, and livability for this particular community in the City of South Pasadena

Comment

Meridian Avenue is clearly not the only street in South Pasadena that experiences speeding cars and poor judgment or inattentiveness exercised by some drivers. However, Meridian Avenue (south of Monterey Road) is a designated collector road with a much higher traffic volume than any other collector road in the City and with minimal traffic calming strategies when compared to other lesser traveled collector streets. It is understood that to have a successful outcome for traffic calming programs, there are three "E-s": engineering measures, educational outreach, and enforcement of those violating the speed limit or driving vehicles in an unsafe manner. With respect to enforcement, I have personally witnessed while walking home many cars that slow down when the drivers spot a radar speed sign deployed by the City on Meridian Avenue, only for them to speed up once they past that very electronic sign. I'm also not certain how effective educational outreach is when there is most likely some percentage of drivers who just use the street as a cut-through to other cities, i.e., Alhambra and Los Angeles and more than likely to get to the 710 and 10 freeways.

Goal

- Identify and implement traffic calming techniques that can be phased over time and monitored for effectiveness, after a new traffic study is conducted by a qualified traffic engineer. Additional speed limit signage and increased traffic surveillance are not effective measures in reducing long-term speeding on Meridian Avenue.

Details

- There are a number of measures that can be used to calm streets down. It is not the intent of this letter and attachment to recommend which set of traffic calming or controlling strategies should be used. Here is an array of measures that could be studied to see what works best for Meridian Avenue:
    - Walkways and landscaping.
    - Shifts in pavement, pinch points in pavement, narrowing of pavement, and changes in pavement material.
    - Traffic diverters and traffic circles.
    - Part way stop signs and four-way stop signs.
    - Speed bumps or humps.
    - Partial or full street closure.
- As noted on the following page, while two collector streets (Marengo Avenue and Via Del Rey) have similar lengths for road segments as Meridian Avenue's length studied in the City's 2014 traffic study, those two street have a greater number of traffic calming/control measures than Meridian Avenue, despite the fact that Meridian Avenue has greater traffic volume and faster speeds. Meridian Avenue may not have elementary schools fronting on it like the other two streets, but middle school and high school students deserve the same consideration as well as residents and visitors on Meridian Avenue, including the elderly, as are currently received by the elementary students on the two other streets.

Recommendation No. 5:---CONTINUED

Develop a traffic calming program for Meridian Avenue, and implement traffic calming measures to maintain and enhance health, safety, and livability for this particular community in the City of South Pasadena

- To illustrate the differences on calming techniques between streets and the volumes of traffic they have:

Name of Collector Road	Segment Limits for Each Collector Road		Length (mile)	2014 Average Daily Traffic Measured (vehicles per day)
Marengo Avenue	Mission Street	Oak Street	0.54	2,585
Marengo Avenue	Oak Street	W. Alhambra Road (South City Limit)	0.63	2,665
Meridian Avenue	Monterey Street	Oak Street	0.47	7,541
Meridian Avenue	Oak Street	Kendall Avenue (South City Limit)	0.49	6,329
Via Del Rey	Monterey Road	Flores Del Oro	0.42	4,769
Via Del Rey	Flores Del Oro	Camino Verde	0.80	2,840

Marengo Avenue (1.17 miles)

- Marengo at Mission Street: 3-way stop sign
- Marengo at Oxley: Zebra crossing with signage (2 stop signs on Oxley)
- Marengo at Monterey: Zebra crossing with 4-way stop signs
- Marengo at Oak: 4-way stop signs
- Marengo at Laurel: 4-way stop signs with Zebra crossing
- Marengo at Spruce: 4-way stop signs with Zebra crossing
- Marengo at Huntington: Signalized intersection
- Marengo at Maple: 4-way stop signs with Zebra crossing
- Marengo at Alhambra: 4-way stop signs (with city of Alhambra)

Meridian Avenue (0.96 mile)

- Meridian at Monterey Road: Signalized intersection
- Meridian at Bank Street: Zebra crossing with pedestrian signage
- Meridian at Oak Street: Flashing electronic warning sign for pedestrians with double solid line crossing (1-way stop sign hidden from Meridian Avenue, on Oak Street behind bushes)
- Meridian at Maple Street: Faded double solid line crossing and no signage (1-way stop sign on Maple Street only)
- Meridian at Kendall Avenue: 4-way stop sign (with city of Los Angeles)

Via Del Rey (1.22 miles)

- Via Del Rey at Flores Del Oro: 4-way stop signs
- Via Del Rey at Camino Del Cerrado: 3-way stop signs with Zebra crossing
- Via Del Rey at Indiana Avenue: 3-way stop signs with Zebra crossing
- Via Del Rey at Camino Verde: 3-way stop signs
- [Via Del Rey was closed at Van Horne Avenue (i.e., El Sereno) to prevent cut through traffic in the 1970s—see lawsuit summary at the end of this attachment.]

Recommendation No. 6:

Remove the zoning designation and disclosure requirements for private properties along the now defunct Meridian Surface Alignment/Meridian Variation Alignment for State Route 710 (formerly Route 7)

Comment

The zoning of the State Route 710 still "taints" properties within its defunct alignment usually referred to as the Meridian Alignment, Meridian Variation, or more recently Alternative F-6. My family's small, one story 1925 single residential house should be zoned as low density residential. However, on legal records it is zoned SPR110000*. I've noticed other homes in the area for sale as zoned SPR310000*. Also, the sellers had to disclose to us that the property was adjacent to the surface route of the State Route 710 Project. This should no longer be the case. It is an unfair burden that should and could be removed.

Recently, the City of South Pasadena purchased a vacant lot parcel at 2028 Berkshire Avenue, land that was no longer deemed necessary by Caltrans as it related to the now defunct State Route 710 surface alignment. The City plans to develop this parcel into a pocket park. The 2014 Initial Study/Negative Declaration for Caltrans Surplus Property Sale found that there was no impact to Land Use Planning including zoning with the sale of properties like 2028 Berkshire Avenue (page 20 of the CEQA document). Appendix A of that document includes Senate Bill No. 416 (Liu) that was approved by the Governor on October 1, 2013. In it, Section 54237.8 is added to the *Government Code* to read: "Notwithstanding any other law, for purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code), the preliminary project alternative referred to as Alternative F-6 in the December 2012 Alternative Analysis Report of the Los Angeles Metropolitan Transportation Authority shall no longer be deemed a feasible alternative for consideration in any state environmental review process for the Interstate 710 North Gap Closure project, State Clearinghouse number 1982092310." Alternative F-6 would have followed a very similar alignment to the "Meridian Variation" approved in the 1998 ROD. However, as is the case with the 710, there is at least an additional complexity to this matter. In 1973, Caltrans sued the City to ensure that the 710 alignment would be on the City's land use map in its General Plan at that time and that no educational, recreational, or public uses would be developed within that State adopted alignment.

The question one needs to ask is if the City is still affected by the 1973 stipulated injunction against developing a park, in this case at 2028 Berkshire Avenue, which is in the footprint of the old 710 Meridian Alignment?

If the formerly owned Caltrans Berkshire parcel can now be developed into a park, why can't properties within and adjacent to the old defunct route be likewise alleviated of this zoning "brand"? If the injunction is no longer relevant for the park, why can't the zoning and disclosures on private properties disappear as well?

Goals

- Review the 1973 injunction by Judge David A. Thomas for its relevance today on affected private properties.
- If necessary, work with State Legislature to revise Sections 622 and 622.1 of the *California Streets and Highways Code* that defines the limits of State Route 710.
- Remove the zoning designation and requirement that relates to all private properties that have been "branded" as being part of the Meridian Alignment (and its variations) for the surface route of the State Route 710 Project (and its various names, like Gap Closure) that continues to be disclosed when selling such properties.

Recommendation No. 6:---CONTINUED

Remove the zoning designation and disclosure requirements for private properties along the now defunct Meridian Surface Alignment/Meridian Variation Alignment for State Route 710 (formerly Route 7)

Detail

- From the 1974 Draft EIS (California Route 7—Long Beach Freeway between Route 10 and Route 210), Chapter 1 (Project Description), Page 12: "On March 21, 1973, the City of South Pasadena amended the City's General Plan to show "Public" and "Educational and Recreational" sections across the adopted route of the Freeway. On May 16, 1973, the State filed an action in the Superior Court of the State of California which sought to: (1) require South Pasadena to place the adopted route for the Long Beach Freeway on the City's General Plan and (2) prohibit the establishment of a park within the area of the State adopted route. On July 16, 1973, Judge David A. Thomas approved a stipulation between the City and the State which provides that the City would not take actions to plan or implement a park or educational and recreational area, nor take any action which would preclude the U.S. Secretary of Transportation from lawfully approving the proposed Long Beach Freeway along the Adopted Route. On September 30, 1973, Judge Thomas ruled that (1) the route was duly and validly adopted on November 18, 1964, and (2) the City was to place the adopted route for the Long Beach Freeway on their General Plan." As also noted by the *Los Angeles Times* in an article dated July 19, 1973, Judge Thomas issued a stipulated preliminary injunction forcing the City of South Pasadena to identify the Long Beach Freeway route (now known as State Route 710) on its general plan.

February 23, 2018

City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Attention: Mr. David Watkins, AICP
Director of Planning and Building

Dear Mr. Watkins:

The City of South Pasadena's Public Works Commission (PWC) respectively provides this letter to summarize our comments regarding the Notice of Preparation of an Environmental Impact Report (EIR), dated January 23, 2018 for the City's General Plan revisions. During our monthly meeting on February 14, 2018, the PWC decided to provide you with a summary of our comments since parts of the General Plan revisions do not align with the priorities of the City Council, as identified for the PWC.

Project Location described in the EIR

This section of the EIR must include an overview of the impacts vehicular traffic has on the City in terms of movement, volume, and connectivity. North-south traffic flows through the City, between the 710 Freeway termini in Alhambra and Pasadena, along Fremont Avenue and Fair Oaks Avenue. East-west traffic moves through the City, from the San Gabriel area to the east with Glendale and Los Angeles to the west, along Huntington Drive and Monterey Road. Although the map in Exhibit 1 is a vicinity map, it should correctly indicate the existing streets, including those just mentioned.

Project Background & Description Section of the EIR

This section of the EIR must include references to the SR710 Early Action Projects list (EAP) that was recently submitted by the City of South Pasadena to the Metro Board. These EAP projects must be analyzed along with related projects in adjacent cities, including Alhambra, Los Angeles, and Pasadena, to identify local traffic patterns, volumes, and the resulting impacts.

The EIR must define how the concepts of "Social Equity" and "Aging In Place" will be incorporated into the specifics of the General Plan revisions. While these terms may be current nomenclature used in the industry, the General Plan must be clear as to their use in the decision making process.

Also, since very little information was made available of the process to determine the other alternatives that will be studied as part of the EIR, the PWC would appreciate any additional information.

Transportation Section of the EIR

The EIR must include a study of the impacts on the flow and volume of traffic on the City's street network of future residential and commercial development as contemplated by the General Plan and Downtown Specific Plan. This would include but not be limited to the City's local and residential streets which are already burdened by cut-through

traffic. In addition, proposals for major streets including Fair Oaks Avenue and Mission Street must be closely scrutinized and studied for adverse environmental impacts

Generally speaking, any proposals for Fair Oaks Avenue should be consistent with the SR710 Early Action Projects List that was recently submitted by the City of South Pasadena to the Metro Board. Those projects will improve cross jurisdictional traffic flows, while minimizing cut-through traffic impacts on residential neighborhoods and improve safety for pedestrians and bicyclists. In addition, these projects are coordinated with adjacent neighboring cities, namely Alhambra and Pasadena.

However, draft concepts for Fair Oaks Avenue, as shown in cross-sections at General Plan meetings, appear to show that left turn lanes would be removed, bike lanes next to the curb lines would be installed, as well as raised islands between bike lanes and parked vehicles. These concepts would reduce capacity, by lane reduction and the necessity of complex signal phasing, to separate vehicular right turns from through bicycle movements. As a result, these proposals would degrade traffic flow, increase delays, increase air emissions due to the added delay, divert through traffic to residential routes and increase collisions relating to rear-ends, sideswipes, head ons and persons accessing their parked cars who cross the bike lane. The text and concept drawings for these proposals should be deleted in their entirety.

In addition, it is premature to show cross-section proposals for Mission Street that would establish double-buffered bike lanes, a road diet and removal of left turn lanes because:

- A few years ago a road diet was simulated using channelizers and was quickly abandoned due to the resultant congestion.
- It would be irresponsible from a traffic safety and operational perspective to remove existing left turn lanes particularly at signalized intersections.
- The intersection of Mission Street and Meridian Avenue is the second-most congested location in the City and a road diet would further degrade traffic flow.
- Mission Street might not be the most bicycle-friendly route in an east-west corridor through the City, given conflicts with bus transit, through traffic and parking friction from retail and restaurant outlets.
- The Council has referred the matter of an east-west bicycle facility to the Public Works Commission and no evaluation of the trade-offs of the various options has yet been conducted. The east-west corridor, in regards to bicycle lanes should consider bicycle alternative routes to Monterey Road and Mission Street, such as El Centro Street.

The proposal for Mission Street should be deleted and replaced by a statement to examine practical and feasible alternatives.

Any reference to "Vision Zero" should also be eliminated in the General Plan. To those not familiar with the term, "Vision Zero", might sound like a positive endeavor to eliminate traffic collisions including pedestrian and bicycle fatalities. However, in practice, it is becoming less of an objective effort to determine the specific causes of collisions and identify customized solutions. Rather, it is becoming more of an ideological pursuit to reduce speeds and traffic flow. It only focuses on perceived

measures for pedestrians and bicyclists, regardless of whether or not there is a collision pattern or if any of those collisions are related to excessive speeding. The obsession with speed control might not be appropriate in Southern California, where excessive speeding on streets is becoming increasingly rare since this is the most congested regional area in the nation.
The strongest Vision Zero advocates have a ready-made template of "solutions", which include bulb outs, speed humps, raised intersections, small curb return radii, road diets and unrealistically-low speed limits. Rather, a more holistic approach is required which considers proactive measures, examines true collision patterns and provides customized solutions in response to traffic collisions for all users of the City's streets. The City should, instead, adopt a Commitment to Reduce Traffic Collisions for All Road Users.

In general, modifications to any existing public street within the City of South Pasadena must be based on good engineering practices and extensive engineering studies since the City must remain fiscally responsible to its residents and businesses.

Utilities Section of the EIR

In regards to the benefits of green infrastructure, the concept may sound trendy, but good engineering practice still dictates the need for storm water management. Portions of the City are in hillside areas and the City is located within an active seismic region. Therefore, encouraging storm water and runoff into the ground in areas where the geology is not favorable may lead to negative consequences, such as slope instability. Rather than making green infrastructure a blanket requirement under the General Plan, let it be a benefit to future developments in the right circumstances.

The EIR must also address public water and sewer upgrades that will become necessary as a result of future residential and commercial development under the General Plan. Given that the City has already exceeded its allotment from the Main San Gabriel Groundwater Basin and drought conditions are expected in the future, the General Plan must include a process for future development to upgrade existing facilities in lieu of requiring future rate increases in the future.

Thank you for allowing the PWC to provide these comments. The South Pasadena Public Works Commission is committed to supporting the present and future goals and objectives of the City's Public Works Department and the City of South Pasadena.

Sincerely,

Gayle Glauz

Public Works Commission Chair

APPENDIX A-2

2021 RNOP AND COMMENT LETTERS

Recirculated Notice of Preparation of a Program Environmental Impact Report and Notice of Scoping Meeting

DATE:	April 20, 2021
TO:	All Interested Parties
FROM:	City of South Pasadena 1414 Mission Street South Pasadena, CA 91030
SUBJECT:	Recirculated Notice of Preparation of a Program Environmental Impact Report and Notice of Scoping Meeting for the South Pasadena General Plan and Downtown Specific Plan Update, and 2021–2029 Housing Element
NOP REVIEW PERIOD:	Friday, April 23, 2021 through Monday, May 24, 2021
VIRTUAL SCOPING MEETING:	Monday, May 3, 2021, 6:30 PM to 7:30 PM via Zoom (See below for further information)

The City of South Pasadena (City) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and is preparing a Program Environmental Impact Report (PEIR) for the City of South Pasadena General Plan and Downtown Specific Plan Update and the 2021–2029 Housing Element (Project). The planning area for the Project includes the approximately 3.5 square miles, or 2,221 acres, within the incorporated City limits. The Project applies to all properties within the planning area.

This Recirculated Notice of Preparation (RNOP) has been prepared and distributed by the City to solicit written comments from responsible and trustee agencies and from the State Office of Planning and Research (OPR). A prior NOP, dated January 23, 2018, was distributed for the proposed updates to the General Plan and Downtown Specific Plan for a 30-day review period from January 25, 2018 through February 23, 2018. This RNOP is necessitated because of the addition of the 2021–2029 Housing Element Update to the PEIR that is being prepared. The location, description, and potential environmental effects of the Project are summarized in this RNOP.

The City is requesting input regarding the scope and content of the environmental information to be addressed in the Draft PEIR. The City requests that any potential responsible or trustee agencies responding to this RNOP reply in a manner consistent with Section 15082(b) of the State CEQA Guidelines, which allows for the submittal of any comments and/or inputs that are germane to your agency's statutory responsibilities in connection with the proposed Project. Your agency may need to use the PEIR when considering issuance of any permits or other approvals. The City has determined that the Project may have a significant effect on the environment and preparation of a PEIR is required; as such, an Initial Study has not been prepared.

Project Location

The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City is surrounded by several municipalities, including the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and unincorporated County of Los Angeles communities, including Garvanza and Highland Park, to the west. Regional access to the City is provided predominantly by State Route 110 (SR 110, Arroyo Seco Parkway), which transects the

City. Interstate 210 (I 210) and SR 134 also provide regional access, with the nearest ramps for both freeways located approximately one mile north of the northern City boundary. The Metro Gold Line also provides light rail access from the City's Mission Station to downtown Los Angeles, the City of Pasadena, and the northern San Gabriel Valley. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity.

Project Background

All California jurisdictions are required by State law (Section 65300 of Government Code) to prepare and maintain a planning document called a General Plan. The City of South Pasadena last comprehensively updated the General Plan in 1988, and the Mission Street Specific Plan (now referred to as the Downtown Specific Plan [DTSP]) was adopted in 1996. Since the adoption of the 1988 General Plan, several minor amendments have been adopted.

The Housing Element is one of the State-mandated elements of a General Plan. It identifies the City's housing conditions, needs, and opportunities; and establishes the goals, policies, and actions (programs) that are the foundation of the City's housing strategy. However, unlike all other General Plan elements, State law requires each municipality to update its Housing Element on a prescribed schedule (most commonly every eight years). The City's 2013–2021 Housing Element is in effect through 2021. Housing needs are determined by the California Housing and Community Development Department (HCD), which allocates numerical housing targets to the Metropolitan Planning Organizations (MPOs), including the Southern California Association of Governments (SCAG), which includes the City of South Pasadena. SCAG finalized its Regional Housing Needs Assessment (or RHNA), on March 9, 2021, and has allocated 2,067 units to the City of South Pasadena, including 578 market-rate units and 1,489 below market-rate units at a range of affordability levels. Cities and counties are not responsible for building this number of units, but rather are required to plan for them, by demonstrating the sufficiency of current land use and development standards and identifying specific Housing Element programs to provide capacity to accommodate the RHNA with implementation dates within three years. The Housing Element will not be certified by HCD if it does not demonstrate standards and programs for housing production capacity to accommodate the RHNA including rezoning if necessary. Penalties, including fines and loss of local discretion, can be levied against cities and counties that fail to implement the Housing Element programs that are included to reach the required housing production capacity.

City of South Pasadena decision-makers will use the General Plan Land Use Element and DTSP Update to provide direction when making land use and infrastructure decisions over the documents' approximate 20-year horizon (through 2040) and will implement the 2021–2029 Housing Element policies and programs to facilitate housing development for all segments of the community over the document's 8-year horizon.

Project Description

The General Plan and DTSP Update serve as a long-term policy guide for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City. The Housing Element serves as the policy guide for decision-making regarding residential development and demonstrates how the City intends to comply with State housing legislation and regional (SCAG) requirements.

The General Plan and DTSP Update and 2021–2029 Housing Element would not authorize any specific development project or other form of land use approval, including public facilities or capital facilities expenditures or improvements. Public review drafts of the General Plan and DTSP Update are posted at the following two sites:

- General Plan and DTSP Update: https://www.southpasadenaca.gov/government/departments/planning-and-building/general-plan-downtown-specific-plan-update; and

- 2021–2029 Housing Element: https://www.southpasadenaca.gov/government/departments/planning-and-building/housing-element-update-2021-2029.

It is noted that the General Plan and DTSP Update are draft versions and, at the time this RNOP is distributed, have not yet been updated to reflect and be consistent with the 2021–2029 Housing Element. The draft documents will continue to be refined during the preparation of the PEIR and public outreach efforts.

Through the public visioning process, the community has identified the character, intensity, and scale of infill development desired for vacant and underutilized tracts in selected areas. Specifically, the community wants new development to be respectful of the place and its historic resources; contribute to the vibrancy of the human experience; and have positive impacts on place-making, health, economy, and the environment. This community feedback as well as legislative requirements have been considered in the development of the General Plan and DTSP Update and 2021–2029 Housing Element.

The General Plan and DTSP Update each include nine chapters, and each of the chapters features an overriding goal, policies, and actions based on the goal.

- **Goals** are long-range, broad, comprehensive targets. Goals are not necessarily measurable or achievable; rather, they describe a desired end-state condition for South Pasadena.
- **Policies** describe context and rationale of desired outcomes and are focused and specific.
- **Actions** are specific proactive steps to achieve the goals. They are the critical link between long-range planning and current decision-making.

The chapters and their content reflect the public visioning process. The overarching principle of each of the chapters is provided below.

- **Our Natural Community.** Live in balance with our natural environment; preserve natural areas and increase the quantity of and access to open space.
- **Our Prosperous Community.** Attract and retain high value, high-wage jobs within the creative sector; diversify the local economy; promote and support local businesses; and build the City's local tax base to create and sustain public amenities and services, while maintaining South Pasadena's small-town character and quality of life.
- **Our Well Planned Community.** Direct the most intensive growth to identified areas while preserving and enhancing the distinctive and stable residential neighborhoods. Encourage pedestrian-oriented mixed-use development while providing and enhancing new and existing public spaces and gathering places.
- **Our Accessible Community.** Provide safe access for all street users – pedestrians, cyclists, public transit users, and motorists – of all ages and abilities and support an integrated multimodal network and efficiently manage parking to support wider community goals.
- **Our Resilient Community.** Increase individual, institutional, and business capacity to survive and adapt to any chronic stress or acute shocks and be able to recover and thrive.
- **Our Healthy Community.** Create environments that encourage healthy and safe lifestyles where all feel able to be active in family, community, and neighborhood life; contribute to the vitality of the City; create a sense of belonging among residents; and have access to nutritious food.
- **Our Safe Community.** Increase awareness of and be prepared for emergencies, minimize threat to life and damage to structures from natural and human-caused hazards, and protect from exposure to excessive noise.

- **Our Active Community.** Add to and enhance our parks and open spaces to provide enriching recreational opportunities.
- **Our Creative Community.** Become a vibrant cultural center by weaving creative expressions into everyday life.

The focus of the General Plan is to preserve the stable and established neighborhoods and direct carefully calibrated growth to five specified areas. Table 1 summarizes the focus areas and maximum non-residential growth projections being considered in the Draft PEIR.

Table 1
General Plan Update Non-Residential Development Pattern

	Non-Residential	
	Retail (sf)	**Office (sf)**
Corridors (Downtown Specific Plan)		
Mission Street and Fair Oaks Avenue	100,000	125,000
Districts		
Ostrich Farm	5,000	100,000
Neighborhood Centers		
Huntington Drive & Garfield Avenue	10,000	50,000
Huntington Drive & Fremont Avenue	10,000	25,000
Huntington Drive & Fletcher Avenue	5,000	0
Totals	**130,000**	**300,000**

du: dwelling units; sf: square feet
Source: Placeworks 2019

The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier (1996) plan and expanding the area included in the DTSP to include Fair Oaks Avenue. Fair Oaks Avenue is a highly visible corridor with some historic assets and many opportunities that complement the historic assets along the Mission Street Corridor. Exhibit 5 illustrates the existing land use plan for the DTSP area, and Exhibit 6 depicts an illustrative plan of the DTSP area upon buildout of projected growth, as shown in Table 1.

Additionally, the General Plan's 2021–2029 Housing Element is being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units, almost 33 times than the last cycle. The significant increase in the City's RHNA housing number is indicative of the severity of the current housing crisis. As part of the proposed 2021-2029 Housing Element, the City must demonstrate to the State that there is available capacity within its jurisdictional boundaries to meet its targeted RHNA number. Per State requirements, the City's proposed Housing Element Update will include the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics.
- An analysis of the barriers to producing and preserving housing.
- A review of the City's progress in implementing current housing policies and programs.
- An identification of goals, policies, and actions in addition to a full list of programs that will implement the vision of the Housing Element.
- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

State law requires City Council adoption of the 2021–2029 Housing Element Update by October 15, 2021, with a 120-day grace period after which cities and counties face statutory penalties.

Probable Environmental Effects

The City has determined that the proposed Project may have a potentially significant impact on the environment and that preparation of a PEIR is the appropriate level of environmental documentation pursuant to CEQA. Implementation of the proposed Project has the potential to impact the following environmental topics: Aesthetics, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire. No impacts to the following environmental topics are anticipated: Agriculture and Forestry Resources and Mineral Resources.

RNOP Review and Comment Period

The RNOP review and comment period is from **Friday, April 23, 2021 through Monday, May 24, 2021**. Due to the time limits mandated by State law, please send your written response at the earliest possible date but not later than 30 days after receipt of this RNOP. In your response, please include the name of a contact person in your agency. Please direct your written comments to:

Mail: Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, California 91030

Email: GeneralPlan@SouthPasadenaCA.gov

Fax: (626) 403-7221

The City will consider all written comments regarding the potential environmental impacts of the Project in its preparation of the PEIR. **Written comments must be submitted by email or to this office by 4:00 PM, Monday, May 24, 2021.** Written comments will also be accepted if entered into the Zoom "Chat" box at the Scoping Meeting, described further below.

Scoping Meeting

A Scoping Meeting will be held to provide the public, trustee and responsible agencies, and other interested parties with information regarding the proposed Project and the environmental review process. The date, time, and location of the Scoping Meeting are as follows:

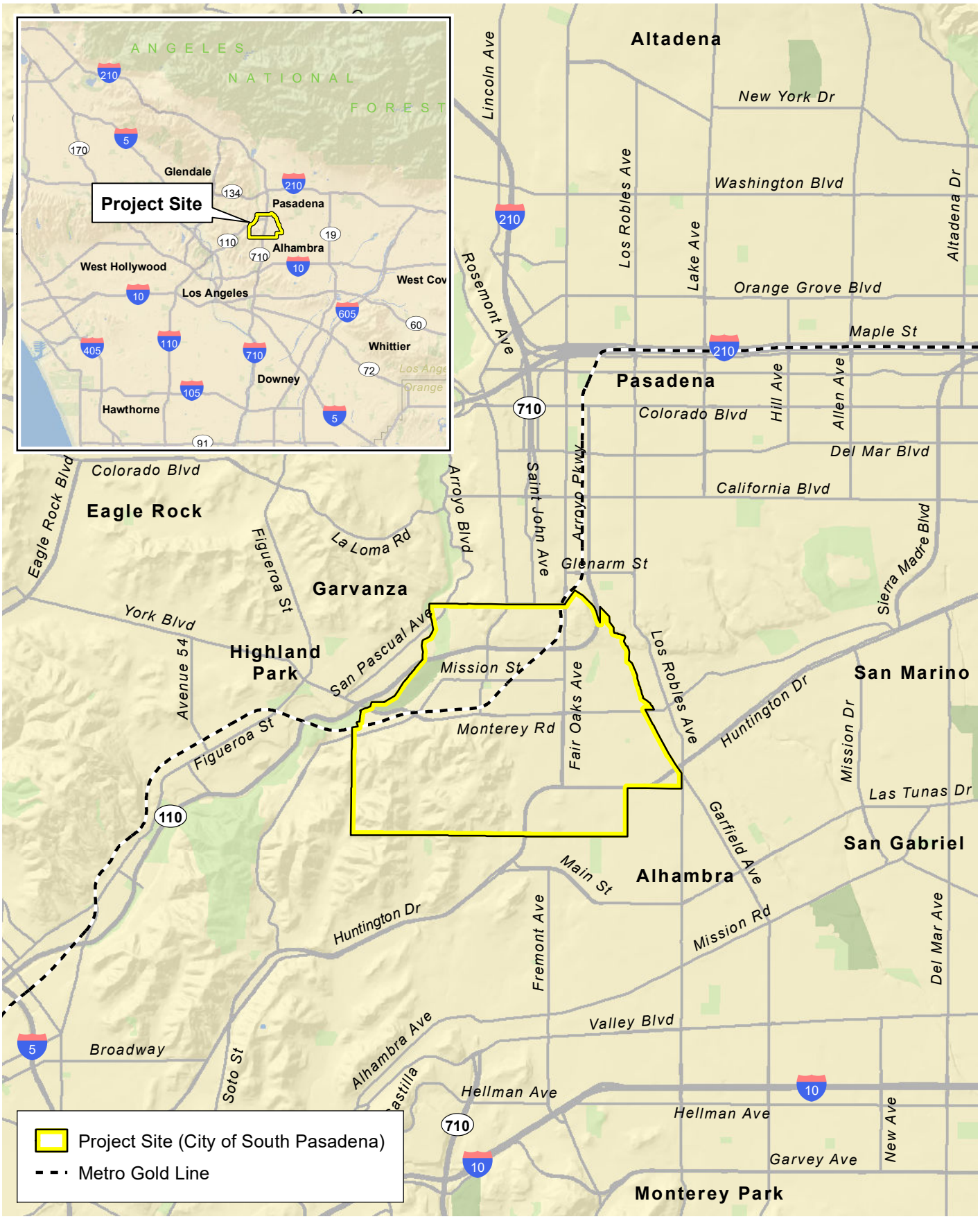
Date: Monday, May 3, 2021

Time: 6:30 PM to 7:30 PM

Location: Zoom Webinar – Please click the following link to join:

https://us02web.zoom.us/j/82167789941?pwd=b3E3RWR4V0M1TEpVY3hSb1BXRXkzUT09

The Zoom passcode (if needed) is 883420. The Scoping Meeting link will also be posted on the City's PEIR web page. City staff and consultants will be in attendance. The meeting format will allow questions and comments to be provided. Additionally, written comments or questions may be submitted in advance to GeneralPlan@SouthPasadenaCA.gov. Verbal comments or questions may be submitted by calling (626) 403-7720 and leaving one 3-minute voicemail message per person to be played during the Scoping Meeting. The comments/questions must be received by 12:00 PM on the day of the Scoping Meeting (May 3, 2021) to ensure adequate time to compile and post. Please provide both your 1) name and address and 2) comments/questions. All public input received by the deadline will be posted on the City's website prior to the Scoping Meeting. No decisions about the Project will be made at the Scoping Meeting. Separate public hearings will be scheduled after the completion of the PEIR.



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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and DTSP Update and 2021 – 2029 Housing Element

N W E S

1 0.5 0 1 Miles

PSOMAS

(Rev: 4-20-2021 MMD) R:\Projects\SPA\3SPA010100\Graphics\RNOP\ex_LV_RL.pdf

From: OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Sent: Tuesday, May 4, 2021 11:03 AM
To: Jillian Neary
Subject: SCH Number 2018011050

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

Your project is published and available for review. Please note the review start and end date.

To view your published document, you can use CEQA Submit's "Navigation" → Published Document" button to view your project with attachments on CEQAnet. For future viewing of your project, please go to CEQAnet and filter by your project's name or unique SCH#.

NOTE – Closing Letters to Lead Agency: The State Clearinghouse (SCH) would like to inform you that our office will transition from providing close of review period acknowledgements on your CEQA environmental document at this time. During the phase of not receiving notice of the close of the review period, comments submitted by State agencies at the close of review period (and after) are available on CEQAnet.

Thank you for using CEQA Submit.

Olivia Naves |she/her|
Assistant Planner – State Clearinghouse Unit
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

To view your submission, use the following link.
https://ceqasubmit.opr.ca.gov/Document/Index/169613/2

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life

May 24, 2021

Ms. Margaret Lin
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

RE: South Pasadena General Plan and Downtown Specific Plan & 2021-2029 Housing Element
SCH # 2018011050
Vic. LA-110/LA-210 Citywide
GTS # LA-2018-03577-RNOP

Dear Ms. Lin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated NOP. The Project includes all actions needed to update the existing (1988) General Plan and (1996) Mission Street Specific Plan (now referred to as the Downtown Specific Plan [DTSP]) and prepare the 2021-2029 Housing Element. The focus of the General Plan and DTSP Update is to preserve the stable and established neighborhoods and direct carefully calibrated growth to five focus areas. Total non-residential growth projections through 2040 including 300,000 square feet of office and 130,000 square feet of commercial. For the proposed 2021-2029 Housing Element, the Southern California Association of Governments has determined that South Pasadena's Regional Housing Needs Assessment allocation is 2,067 units. In addition to our comment letter dated on 2/23/2018, we offer the following comment for your consideration.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

http://opr.ca.gov/ceqa/updates/guidelines/

As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at

http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020.

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf

Caltrans encourages lead agencies to complete traffic safety impact analysis in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2018-03577AL-RNOP.

Sincerely,

Frances Duong

FRANCES DUONG
Acting IGR/CEQA Branch Chief

email: State Clearinghouse

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 28, 2021

Margaret Lin
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030
GeneralPlan@southpasadenaCA.gov

Subject: Notice of Preparation of a Draft Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan & 2021-2029 Housing Element Project, SCH #2018011050, City of South Pasadena, Los Angeles County

Dear Ms. Lin:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the City of South Pasadena (City; Lead Agency) for the South Pasadena General Plan and Downtown Specific Plan and 2021-2029 Housing Element (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA;

Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The Project involves updates to the City of South Pasadena's existing General Plan and Downtown Specific Plan and preparation of the 2021-2029 Housing Element. As a response to recently passed State law, the General Plan and Downtown Specific Plan are focused on future growth in five specified areas in downtown South Pasadena. City of South Pasadena decision-makers will use the General Plan Land Use Element and Downtown Specific Plan Update to provide direction when making land use and infrastructure decisions over the document's approximate 20-year horizon (through 2040). The City will implement the 2021-2029 Housing Element policies and programs to facilitate housing development for all segments of the community over the document's 8-year horizon. The Housing Element sets goals, objectives, policies, and programs intended to further long-range planning efforts to ensure compliance with State law.

Location: The Project would apply to the City of South Pasadena, located approximately five miles northeast of downtown Los Angeles, on the western edge of the San Gabriel Valley area of Los Angeles County.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

Specific Comments

1) Adequate Sites Inventory. CDFW recommends the City prepare a map of the following areas if present within or adjacent to the City boundary. In addition, the City should consider the Project's potential impacts on the following areas if present within or adjacent to the Project boundary:

   a) Conservation easements or mitigation lands;
   b) U.S. Fish and Wildlife Service Threatened & Endangered Species Active Critical Habitat (USFWS 2020);
   c) County of Los Angeles Significant Ecological Areas (SEAs);
   d) Wildlife corridors, such as those found along the foothills of the San Rafael Hills;
   e) Sensitive Natural Communities [see General Comment #3 (Biological Baseline Assessment)];
   f) Aquatic and riparian resources including (but not limited to) rivers, channels, streams, wetlands, and vernal pools, and associated natural plant communities; and
   g) Urban forests, particularly areas with dense and large trees [see Specific Comment #4 (Loss of Bird and Raptor Nesting Habitat)].

   CDFW recommends the City avoid sites that may have a direct or indirect impact on conservation easements or lands set aside as mitigation. CDFW recommends the DEIR include measures where future housing development facilitated by the Project mitigates

(avoid if feasible) for impacts on biological resources occurring within SEAs and critical habitat. Future housing development facilitated by the Project should also mitigate for impacts on wildlife corridors, sensitive natural communities, aquatic and riparian resources, and urban forests.

2) Impacts on Wildlife Corridors and Wildlife. CDFW is concerned that the Project would impact wildlife corridors. Additionally, development occurring adjacent to natural habitat areas such as wildlife corridors could have direct or indirect impacts on wildlife. Impacts could result from increased human presence, traffic, noise, and artificial lighting. Increased human-wildlife interactions could lead to injury or mortality of wildlife. For instance, as human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety.

   CDFW recommends the DEIR analyze whether the Project may impact wildlife corridors. Impacts include habitat loss and fragmentation, narrowing of a wildlife corridor, and introduction of barriers to wildlife movement. The DEIR should also include measures where future housing development facilitated by the Project thoroughly analyze these potential impacts to wildlife corridors. Additionally, CDFW recommends future development projects thoroughly analyze whether the project may have direct and indirect impacts wildlife resulting from increased human presence, traffic, noise, and artificial lighting.

3) Nesting Birds. CDFW recommends the DEIR include measures where future housing development facilitated by the Project avoids potential impacts to nesting birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.

   a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.

   b) CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.

   c) If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures where future housing development facilitated by the Project mitigates for impacts. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other such habitat within 300 feet of the project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors

working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

4) Loss of Bird and Raptor Nesting Habitat. The biggest threat to birds is habitat loss and conversion of natural vegetation into another land use such as development (e.g., commercial, residential, industrial). In the greater Los Angeles region, urban forests and street trees, both native and some non-native species, provide habitat for a high diversity of birds (Wood and Esaian 2020). Some species of raptors have adapted to and exploited urban areas for breeding and nesting (Cooper et al. 2020). For example, raptors (*Accipitridae*, *Falconidae*) such as red-tailed hawks (*Buteo jamaicensis*) and Cooper's hawks (*Accipiter cooperii*) can nest successfully in urban sites. Red-tailed hawks commonly nest in ornamental vegetation such as eucalyptus (Cooper et al. 2020). According to iNaturalist, there are multiple observations of red-tailed hawks and Copper's hawks within the City.

   a) CDFW recommends the DEIR provide measures where future housing development facilitated by the Project avoids removal of any native trees, large and dense-canopied native and non-native trees, and trees occurring in high density (Wood and Esaian 2020). CDFW also recommends avoiding impacts to trees protected by the City's Heritage Tree Program and Tree Ordinance. CDFW also recommends avoiding impacts to understory vegetation (e.g., ground cover, subshrubs, shrubs, and trees).

   b) If impacts to trees cannot be avoided, trees should be replaced to compensate for the temporal or permanent loss habitat within a project site. Depending on the status of the bird or raptor species impacted, replacement habitat acres should increase with the occurrence of a California Species of Special Concern. Replacement habitat acres should further increase with the occurrence of a CESA-listed threatened or endangered species.

   c) CDFW recommends planting native tree species preferred by birds. This includes coast live oak (*Quercus agrifolia*) and California sycamore (*Platanus racemosa*) (Wood and Esaian 2020). CDFW recommends Audubon Society's Plants for Birds for more information on selecting native plants and trees beneficial to birds (Audubon Society 2020).

5) Bats. Numerous bat species are known to roost in trees and structures throughout Los Angeles County (Remington and Cooper 2014). In urbanized areas, bats use trees and man-made structures for daytime and nighttime roosts. Accordingly, CDFW recommends the DEIR provide measures where future housing development facilitated by the Project avoids potential impacts to bats.

   a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) ground disturbance, vegetation removal, and any activities leading to increased noise levels may have direct and/or indirect impacts on bats and roosts.

b) CDFW recommends a project-level biological resources survey provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from project construction and activities including (but not limited to) ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal. If necessary, to reduce impacts to less than significant, a project-level environmental document should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].

General Comments

1) Disclosure. An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.

   a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.

   b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened,

sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to a project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. A project-level environmental document should include the following information:

a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting Vegetation Classification and Mapping Program - Natural Communities webpage (CDFW 2020a);

b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;

c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a project site and within the neighboring vicinity. The Manual of California Vegetation (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where project activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a project. CDFW's California Natural Diversity Database (CNDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2020b). An assessment should include a nine-quadrangle search of the CNDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern, and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be

addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's Survey and Monitoring Protocols and Guidelines for established survey protocol for select species (CDFW 2020c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the U.S. Fish and Wildlife Service; and,

f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases.

g) A biological resources survey should include identification and delineation of any rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.

4) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting CNDDB Field Survey Forms (CDFW 2020d). The City should ensure data collected at a project-level has been properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.

5) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:

a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;

b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];

c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;

d) A discussion on Project-related changes on drainage patterns; the volume, velocity, and

frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project sites. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;

e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,

f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the environmental document should indicate why the cumulative impact is not significant. The City's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].

6) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:

a) A complete discussion of the purpose and need for, and description of, the proposed Project;

b) CEQA Guidelines section 15126.6(a) states that an environmental document shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project. CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and,

c) A range of feasible alternatives to Project component location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6).

d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow; watercourse and meander; and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.

7) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

8) Jurisdictional Waters. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq*.

a) CDFW's issuance of a Lake and Streambed Alteration (LSA) Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement. Please visit CDFW's Lake and Streambed Alteration Program webpage for information about LSA Notification (CDFW 2020e).

b) In the event the project area may support aquatic, riparian, and wetland habitats; a preliminary delineation of the streams and their associated riparian habitats should be included in the environmental document. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service (USFWS) wetland definition adopted by CDFW (Cowardin et al. 1970). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.

c) In project areas which may support ephemeral or episodic streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of these resources and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.

d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.

e) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the environmental document evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.

9) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The Wetlands Resources policy the Commission "…seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California (CFGC 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to

compensate for unavoidable impacts be included in an environmental document and these measures should compensate for the loss of function and value.

b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

10) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from a project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

11) Compensatory Mitigation. An environmental document should include mitigation measures for adverse Project related direct or indirect impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

12) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, an environmental document should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.

Conclusion

We appreciate the opportunity to comment on the NOP for the South Pasadena General Plan and Downtown Specific Plan & 2021-2029 Housing Element Project to assist the City of South Pasadena in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at Andrew.Valand@wildlife.ca.gov or (562) 292-6821.

Sincerely,

DocuSigned by:
Erinn Wilson-Olgin
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Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW
Erinn Wilson-Olgin, Los Alamitos – Erinn.Wilson-Olgin@wildlife.ca.gov
Victoria Tang, Los Alamitos – Victoria.Tang@wildlife.ca.gov
Ruby Kwan-Davis, Los Alamitos – Ruby.Kwan-Davis@wildlife.ca.gov
Felicia Silva, Los Alamitos – Felicia.Silva@wildlife.ca.gov
Frederic Rieman, Los Alamitos – Frederic.Rieman@wildlife.ca.gov
Susan Howell, San Diego – Susan.Howell@wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov

State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov

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LOS ANGELES COUNTY
SANITATION DISTRICTS
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1955 Workman Mill Road, Whittier, CA 90601-1400
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May 11, 2021

Ref. DOC 6152105

Ms. Margaret Lin
Manager of Long Range Planning
and Economic Development
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Dear Ms. Lin:

RNOP Response for the South Pasadena General Plan and
Downtown Specific Plan Update and 2021-2029 Housing Element

The Los Angeles County Sanitation Districts (Districts) received a Recirculated Notice of Preparation of a Draft Environmental Impact Report (RNOP) for the subject project on April 21, 2021. The City of South Pasadena (City) is located within the jurisdictional boundary of District No. 16. We offer the following comments:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the City except to state that presently no deficiencies exist in Districts' facilities that serve the City. For information on deficiencies in the City sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.

2. The Districts should review individual developments within the City to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.

3. The City's wastewater is treated at one or more of the following: the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 million gallons per day (mgd) and currently processes an average flow of 259.6 mgd.; the Whittier Narrows WRP located near the City of South El Monte, which has a capacity of 15 mgd and currently processes an average flow of 9.9 mgd; and/or the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average flow of 21.3 mgd.

4. In order to estimate the volume of wastewater a project will generate, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link for a copy of the Districts' average wastewater generation factors.

5. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee may be required before a project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and

select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, developers should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsd.org.

Very truly yours,

Adriana Raza

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

May 24, 2021

Ms. Margaret Lin
City of South Pasadena
Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030
Sent by Email: generalplan@southpasadenaca.gov

RE: South Pasadena General Plan and Downtown Specific Plan Update, and 2021-2029 Housing Element
Recirculated Notice of Preparation of Environmental Impact Report (EIR)

Dear Ms. Lin:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed South Pasadena General Plan and Downtown Specific Plan Update, and 2021-2029 Housing Element (Plan) located in the City of South Pasadena (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Plan. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

Project Description

The Project area is bounded by the City of Pasadena to the north; the City of San Marino to the east; the City of Alhambra to the south; the City of Los Angeles to the southwest; and unincorporated County of Los Angeles communities to the west. The Metro L Line (Gold) also

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

provides light rail access from the City's South Pasadena Station to downtown Los Angeles, the City of Pasadena, and the northern San Gabriel Valley. The General Plan and Downtown Specific Plan (DTSP) Update serve as a long-term policy guide for decision-making regarding the physical development, resource conservation, and character of the City and establishes a non-residential development capacity for the City. The Housing Element serves as the policy guide for residential development and demonstrates how the City intends to comply with State housing legislation and regional (SCAG) requirements.

Recommendations for EIR Scope and Content

The Plan and EIR should include an updated inventory of existing and planned transit service provided by Metro and any other transit operators serving the City. Reference documents that should be used include Metro's 2020 Long Range Transportation Plan and 2021 NextGen Bus Plan. The Plan should include policies to enhance access and use of public transit, as recommended below. The EIR should analyze potential impacts to public transit service and facilities. Attention should be given to South Pasadena Station, which is served by the L Line (Gold).

Adjacent Review Policy

The Plan area includes Metro-owned right-of-way (ROW) and transit facilities for Metro Rail and Metro Bus. In particular, these lines include the L Line (Gold). Buses and trains operate 24 hours a day, seven days a week in these facilities.

The EIR's transportation section should analyze potential impacts on Metro within the Plan area, and identify mitigation measures or project design features as appropriate. Metro recommends reviewing the Metro Adjacent Development Handbook (available at https://www.metro.net/devreview/) to identify issues and best practices for development standards arising from adjacency to Metro infrastructure. In addition, Metro recommends that the Plan include a policy encouraging applicants to coordinate with Metro during City Planning review if the subject parcel is within a 100-foot buffer of Metro infrastructure. Such projects should also comply with the Adjacent Development Handbook.

Transit Supportive Planning: Recommendations and Resources

Metro would like to identify the potential synergies associated with transit-oriented communities, and recommend planning resources to aid in the development of the Plan:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the City review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at https://www.metro.net/projects/tod-toolkit.

2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments.

3. Transit Connections and Access: Metro strongly encourages the City to include policies in the Plan that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the bus stops and nearby destinations. These policies should guide future capital improvements as well as private development to be approved by the City. Policy topics include:

    a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with American with Disabilities Act (ADA) -compliant curb ramps, and other amenities along all public street frontages of a development to improve pedestrian safety and comfort to access transit stations and bus stops. Best practices for Complete Streets should be incorporated where possible.

    b. Transfer Activity: Best practices that consider and accommodate transfer activity between bus lines that will occur along the sidewalks and public spaces. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at https://www.metro.net/projects/systemwidedesign.

    c. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged.

    d. First & Last Mile Access: The Plan should address first-last mile connections to transit (particularly to the South Pasadena Station and several Metro Bus Stops) and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.

4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

5. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

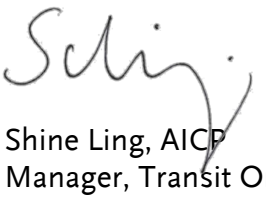
6. Art: Metro encourages the thoughtful integration of art and culture into public spaces and will need to review any proposals for public art and/or placemaking facing a Metro ROW. Please contact Metro Arts & Design staff for additional information.

7. Transit Pass Programs: Metro would like to inform the City of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at https://www.metro.net/riding/eapp/.

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: https://www.metro.net/projects/devreview/

STATE OF CALIFORNIA Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

May 5, 2021

Margaret Lin
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2018011050, South Pasadena General Plan and Downtown Specific Plan & 2021-2029 Housing Element Project, Los Angeles County

Dear Ms. Lin:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

SCAG
INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

May 24, 2021

Ms. Margaret Lin, Manager
City of South Pasadena, Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, California 91030
E-mail: GeneralPlan@SouthPasadenaCA.gov

RE: SCAG Comments on the Recirculated Notice of Preparation of a Program Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan Update, 2021-2029 Housing Element [SCAG NO. IGR9517]

Dear Ms. Lin,

Thank you for submitting the Recirculated Notice of Preparation of a Program Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan Update, 2021-2029 Housing Element ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.[1]

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Recirculated Notice of Preparation of a Program Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan Update, 2021-2029 Housing Element in Los Angeles County. The proposed project includes a General Plan update for the 2040 horizon year addressing land use and future development capacity, an update of the Downtown Specific Plan, formerly known as the Mission Street Specific Plan, and the 2021-2029 Housing Element.

When available, please email environmental documentation to *IGR@scag.ca.gov* providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Rongsheng Luo
Acting Manager, Compliance and Performance Monitoring

[1] Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

COMMENTS ON THE RECIRCULATED NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE SOUTH PASADENA GENERAL PLAN AND DOWNTOWN SPECIFIC PLAN UPDATE, 2021-2029 HOUSING ELEMENT [SCAG NO. IGR9517]

CONSISTENCY WITH CONNECT SOCAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCAL GOALS

The SCAG Regional Council fully adopted Connect SoCal in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCAL GOALS	
Goal #1:	*Encourage regional economic prosperity and global competitiveness*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*
Goal #3:	*Enhance the preservation, security, and resilience of the regional transportation system*
Goal #4:	*Increase person and goods movement and travel choices within the transportation system*
Goal #5:	*Reduce greenhouse gas emissions and improve air quality*
Goal #6:	*Support healthy and equitable communities*
Goal #7:	*Adapt to a changing climate and support an integrated regional development pattern and transportation network*
Goal #8:	*Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
Goal #9:	*Encourage development of diverse housing types in areas that are supported by multiple transportation options*
Goal #10:	*Promote conservation of natural and agricultural lands and restoration of habitats*

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCAL GOALS		
Goal		Analysis
Goal #1:	*Encourage regional economic prosperity and global competitiveness*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the Connect SoCal webpage. Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions

about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the Connect SoCal Demographics and Growth Forecast Technical Report. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of South Pasadena Forecasts			
	Year 2020	**Year 2030**	**Year 2035**	**Year 2045**	**Year 2020**	**Year 2030**	**Year 2035**	**Year 2045**
Population	19,517,731	20,821,171	21,443,006	22,503,899	26,088	26,533	26,767	27,240
Households	6,333,458	6,902,821	7,170,110	7,633,451	10,517	10,831	10,973	11,245
Employment	8,695,427	9,303,627	9,566,384	10,048,822	11,528	11,730	11,832	12,136

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the PEIR webpage and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

REGIONAL HOUSING NEEDS ALLOCATION

On March 4, 2021 SCAG's Regional Council adopted the 6th cycle Final Regional Housing Needs Assessment (RHNA) Allocation Plan which covers the planning period October 2021 through October 2029. The 6th cycle Final RHNA allocation for the applicable jurisdiction is below.

SCAG 6th Cycle Final RHNA Allocation for City of South Pasadena	
Very low income	757
Low income	398
Moderate income	334
Above moderate income	578
Total RHNA Allocation	2,067

Sixth cycle housing elements are due to the California Department of Housing and Community Development (HCD) by October 15, 2021. SCAG encourages jurisdictions to prepare the draft housing element in advance of the due date to ensure adequate time to address HCD comments and adopt a final housing element. Jurisdictions that do not have a compliant housing element may be ineligible for certain State funding and grant opportunities and may be at risk for legal action from stakeholders or HCD.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL: May 18, 2021
GeneralPlan@SouthPasadenaCA.gov
Margaret Lin, Manager
City of South Pasadena, Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, California 91030

Recirculated Notice of Preparation of a Program Environmental Impact Report for the South Pasadena General Plan and Downtown Specific Plan Update, and 2021-2029 Housing Element (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Program Environmental Impact Report (EIR). Please send a copy of the Program EIR upon its completion and public release directly to South Coast AQMD as copies of the Program EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment[5].

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*[6] is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory[7]. The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*[8] includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook[1], South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan[9], and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy[10].

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC210422-01
Control Number

[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.
[6] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: http://www.arb.ca.gov/ch/handbook.pdf.
[7] CARB's technical advisory can be found at: https://www.arb.ca.gov/ch/landuse.htm.
[8] South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.
[9] South Coast AQMD's 2016 Air Quality Management Plan can be found at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf (starting on page 86).
[10] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:12 AM
To: GeneralPlan
Subject: RNOP Scoping question

In 2020 there was a total of 27 ADUs permitted with a lot less actually built. The new ADU actually increases the number of restrictions on ADUs. What evidence is there that ADUs will increase to 79 a year as estimated on the draft housing element??? Like what specific proposals make ADUs easier to build in 2021 compared to earlier years?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:12 AM
To: GeneralPlan
Subject: Scoping question

A Inclusionary Housing Ordinance was passed that required 10% low and 10% very low affordability levels. AB 1397 requires that for each site the realistic development potential must be based on the proportion of buildings built at the affordability level required in the region. Is there any building using an inclusionary ordnance that has this level of affordability?? If there is one, what incentives were given to make that building feasible?? And in what way are you applying the requirement of AB 1397 in your realistic development capacity calculations?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:13 AM
To: GeneralPlan
Subject: scoping question

In order to be included in a sites inventory for the housing element AB 1397 requires substantial evidence that the current use will be discontinued in the planning period. Substantial evidence is a legal definition and according to the sites memo published by HCD on 6/10 that means “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” The Trader Joes on Mission street is an active grocery store with lines out the door every single day and a property tax rate of $6,000 a year. What is the substantial evidence that Traders Joes will discontinue its use???

--

Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:13 AM
To: GeneralPlan
Subject: Scoping question

AB 1397 requires that all locations that a commercial only building can be built has the realistic development capacity cut by a significant amount. How is that requirement taken into account in the housing element??? Are we planning on banning commercial buildings on Mission and Fair Oaks??

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:13 AM
To: GeneralPlan
Subject: scoping question

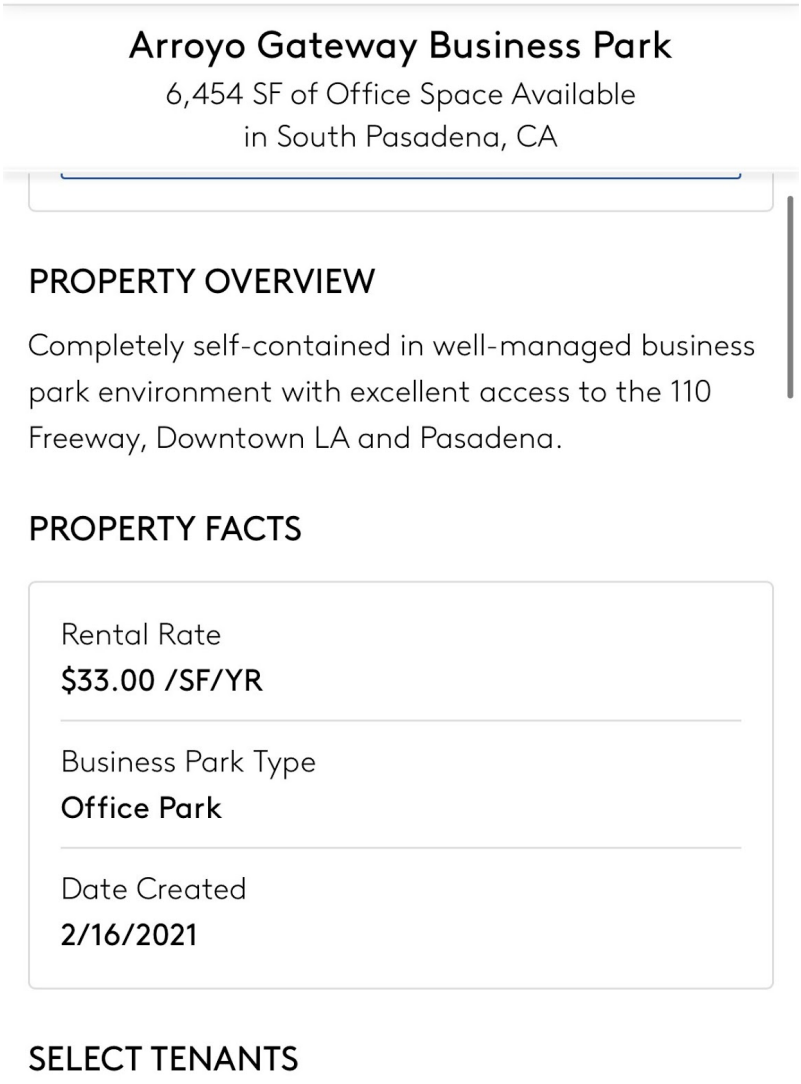
AB 1397 requires that the realistic development capacity be calculated for each individual site. The following is the Realistic Development Capacity header from the 6/10 HCD Memo:
Realistic development capacity for nonresidential, nonvacant, or overlay zoned sites The capacity calculation must be adjusted to reflect the realistic potential for residential development capacity on the sites in the inventory. Specifically, when the site has the potential to be developed with nonresidential uses, requires redevelopment, or has an overlay zone allowing the underlying zoning to be utilized for residential units, these capacity limits must be reflected in the housing element. Factors used to make this adjustment may include the following: • Performance standards mandating a specified portion of residential development in mixed use or nonresidential zones (e.g., residential allowed only above first floor commercial). • The likelihood for residential development such as incentives for residential use, market demand, efforts to attract and assist developers, or allowance of 100 percent residential development. • Local or regional residential development trends in the same nonresidential zoning districts. • Local or regional track records, past production trends, or net unit increases/yields for redeveloping sites or site intensification. This estimate may be based on the rate at which similar parcels were developed during the previous planning period, with Site Inventory Guidebook Page 21 May 2020 adjustments as appropriate to reflect new market conditions or changes in the regulatory environment. If no information about the rate of development of similar parcels is available, report the proportion of parcels in the previous housing element's site inventory that were developed during the previous planning period. For example, if past production trends indicate that two out of three similar sites were developed for residential use, and one out of three similar sites was developed for commercial use, an initial estimate of the proportion of new development which is expected to be residential would be two-thirds, i.e., 0.67. • Local or regional track records, trends, or build out yields for redeveloping sites or site intensification. In addition, the housing element should include monitoring programs with next-step actions to ensure sites are achieving the anticipated development patterns. The programs should identify modifications to incentives, sites, programs, or rezoning the jurisdiction will take should these strategies not yield the expected housing potential.

According to the draft housing element South Pasadena applies a 80% realistic development capacity to all sites, regardless of site constraints, potential commercial, etc, etc. How does South Pasadena propose that using a 80% development capacity not violate the law as defined in AB 1397 and explained above?????

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:14 AM
To: GeneralPlan
Subject: scoping question

In order to be included in a sites inventory for the housing element AB 1397 requires substantial evidence that the current use will be discontinued in the planning period. Substantial evidence is a legal definition and according to the sites memo published by HCD on 6/10 that means "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The office complex located at 143 Monterrey is currently mostly filled with successful businesses. It also is trying to lease the two open spots and it says it is a "Well managed business park." What is the Substantial Evidence that is required to include this in a sites inventory???



Arroyo Gateway Business Park

6,454 SF of Office Space Available
in South Pasadena, CA

PROPERTY OVERVIEW

Completely self-contained in well-managed business park environment with excellent access to the 110 Freeway, Downtown LA and Pasadena.

PROPERTY FACTS

Rental Rate
$33.00 /SF/YR

Business Park Type
Office Park

Date Created
2/16/2021

SELECT TENANTS

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:14 AM
To: GeneralPlan
Subject: scoping question

In order to be included in a sites inventory for the housing element AB 1397 requires substantial evidence that the current use will be discontinued in the planning period. Substantial evidence is a legal definition and according to the sites memo published by HCD on 6/10 that means “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” The Ralphs in the Southeast corner of the city is the main grocery store for San Marino and North Alhambra. The parking lot is frequently completely full. What is the substantial evidence that the use will be discontinued in the next planning period??? It states there is owner interest. Is that interest in the whole lot or just a part of the lot?? And would it be legal to include the whole lot in the sites inventory if the owner only expressed interest in developing a part of the lot???

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:15 AM
To: GeneralPlan
Subject: Scoping question

In order to be included in a sites inventory for the housing element AB 1397 requires substantial evidence that the current use will be discontinued in the planning period. Substantial evidence is a legal definition and according to the sites memo published by HCD on 6/10 that means “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” The parking lot behind Rite Aid at 901 Brent has been listed as a potential site. This is the parking lot that the Rite Aid and other businesses require for their business to survive. What is the substantial evidence that this use will be discontinued???

Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:15 AM
To: GeneralPlan
Subject: scoping question

In order to be included in a sites inventory for the housing element AB 1397 requires substantial evidence that the current use will be discontinued in the planning period. Substantial evidence is a legal definition and according to the sites memo published by HCD on 6/10 that means “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” City Hall, the Police Department, and the Public works yard have all been mentioned as possibilities of being included in the sites element. What is the substantial evidence that those uses will be discontinued in the next 8 years??

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:15 AM
To: GeneralPlan
Subject: scoping question

In order to be included in a sites inventory for the housing element AB 1397 requires substantial evidence that the current use will be discontinued in the planning period. Substantial evidence is a legal definition and according to the sites memo published by HCD on 6/10 that means "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." The office/warehouse complex at 220 Pasadena Ave has a recently opened gym, a successful daycare, and is currently leasing their warehouses. What is the substantial evidence that these uses will end in the planning period??? And in the draft it says there is owner interest. Is the owner interest in the whole development or just part of it??? And if it is just part of the property, can you legally include the whole property in the sites element??

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:16 AM
To: GeneralPlan
Subject: scoping question

1709 Garfield Avenue is being talked about as a potential site for housing. It contains two homes that are almost 100 years old. Does South Pasadena allow homes that old to be torn down??? And has the owner expressed an interest in tearing these homes down since the average single family home rents for $4,000 a month in South Pasadena??

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:16 AM
To: GeneralPlan
Subject: scoping question

AB 1397 requires that for the realistic development capacity only the useable land can be used for counting in a sites inventory. At 1051 Mission street, the current school district headquarters, about 25% of the building is a building on the national historic register. How is this being factored into the realistic development capacity??? There was also a deal for 58 market rate unites to be built on this site. That deal fell though because it was not financially viable. How does the requirement of all buildings having 10% low and 10% very low income units being factored into the realistic development capacity of this site, as required by AB 1397???

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:16 AM
To: GeneralPlan
Subject: scoping question

335 Monterrey is talked about as being a possible location for more housing. How can this property be developed and 323 Monterrey still have access since they share a driveway?? AB 1397 also requires factors such as the sloping of land to be use in the calculation of realistic development capacity. How is this being done??

--

Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

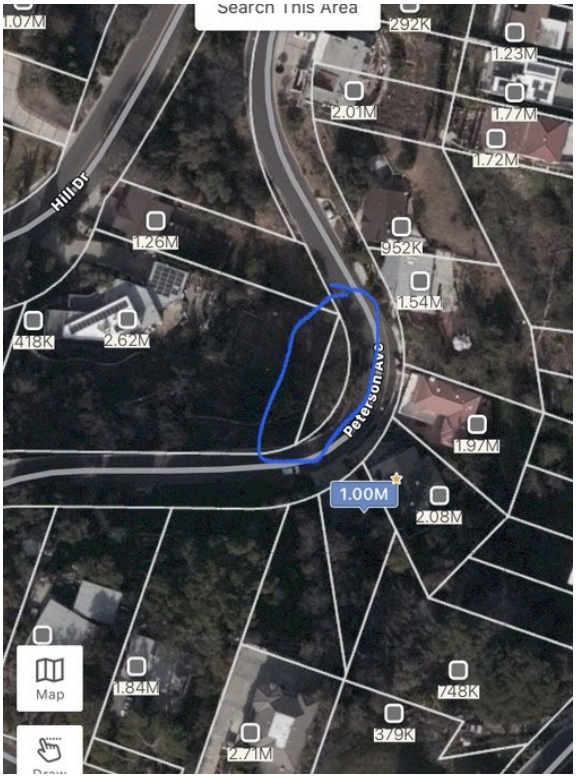
From: Josh Albrektson
Sent: Monday, May 24, 2021 1:16 AM
To: GeneralPlan
Subject: scoping question

In order to be included in a sites inventory for the housing element AB 1397 requires substantial evidence that the current use will be discontinued in the planning period. Substantial evidence is a legal definition and according to the sites memo published by HCD on 6/10 that means “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” Pavilions at 1213 Fair Oaks st is undergoing a multimillion dollar renovation that the South Pasadena planning department is approving as I write this. What is the substantial evidence that a business would spend millions renovating the building only to discontinue the grocery store in the next 8 years?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:17 AM
To: GeneralPlan
Subject: scoping question

What kind of home does South Pasadena believe can be built on this lot??



--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:17 AM
To: GeneralPlan
Subject: Scoping question

Two pocket parks were planned on Cal Trans lots. These lots are included in the housing inventory. Is South Pasadena planning on discontinuing the plans to make the parks???

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:17 AM
To: GeneralPlan
Subject: scoping question

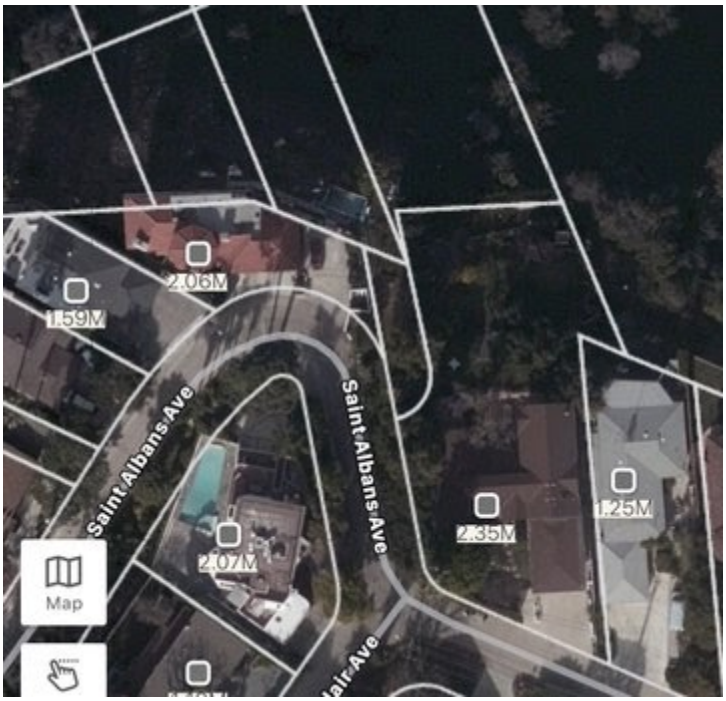
The Community Garden is included as a possible site for housing. Is South Pasadena planning on discontinuing this usage??

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:18 AM
To: GeneralPlan
Subject: scoping question

This telephone pole is makes up the majority of this lot. How is someone supposed to build a home on a lot that most of the land is taken up by the telephone??


Done



--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

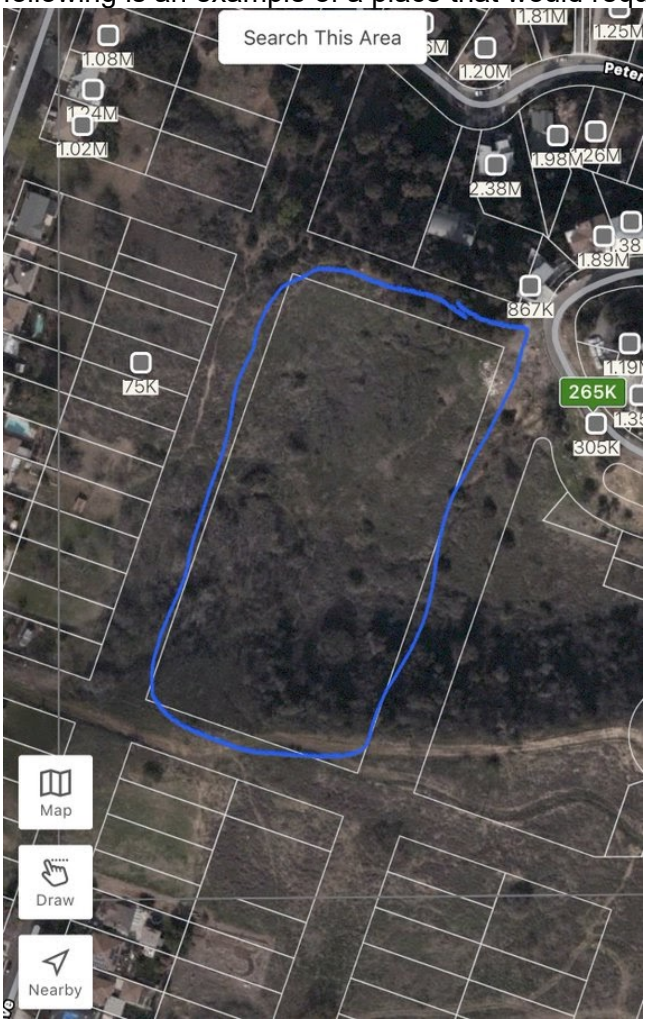
From: Josh Albrektson
Sent: Monday, May 24, 2021 1:18 AM
To: GeneralPlan
Subject: scoping question

Multiple potential lots are listed as possible homes which are landlocked surrounded by already built homes. Are we planning on tearing down these homes for access???

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:18 AM
To: GeneralPlan
Subject: scoping question

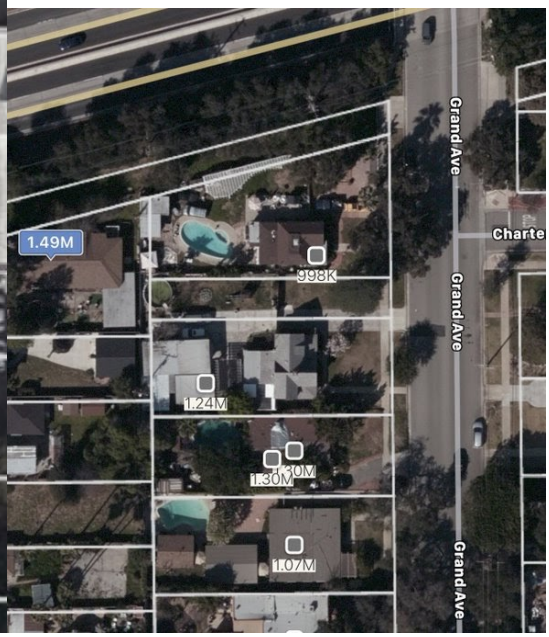
Law requires that if a site doesn't include infrastructure that there is a plan to develop that infrastructure. If the lots on the hillside on the SouthWest corner of South Pasadena is included, are there plans to build roads to these lots??? And what would building on the hillside do to the wildlife and plants currently there??? The following is an example of a place that would require roads.



--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:19 AM
To: GeneralPlan
Subject: scoping question

Do the people who are using these properties know that they are potential homes, according to South Pasadena??



--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrektson
Sent: Monday, May 24, 2021 1:19 AM
To: GeneralPlan
Subject: scoping question

Do the business in the Osteostrong building know that their “Vacant” parking lot will be turned into housing???

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

APPENDIX B

AIR QUALITY AND GREENHOUSE GAS MODELING DATA

South Pasadena v2 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	South Pasadena v2
Operational Year	2040
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	7.20
Location	S Pasadena, CA 91030, USA
County	Los Angeles-South Coast
City	South Pasadena
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4945
EDFZ	7
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.14

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	246	Dwelling Unit	79.9	246,000	2,881,363	—	608	—

Apartments Mid Rise	2,232	Dwelling Unit	58.7	2,232,000	223,200	—	5,513	—
Single Family Housing	297	Dwelling Unit	29.4	297,000	0.00	—	734	—
Strip Mall	130	1000sqft	2.98	130,000	6,500	—	—	—
General Office Building	300	1000sqft	6.89	300,000	15,000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	52.9	124	41.0	470	1.04	2.21	121	123	2.21	30.5	32.7	1,477	119,954	121,431	152	3.37	56.4	126,304
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	35.2	107	41.2	268	0.98	2.13	121	123	2.11	30.5	32.6	1,477	114,483	115,960	153	3.55	22.3	120,857
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	44.8	116	33.1	382	0.91	1.49	115	117	1.49	29.2	30.7	1,477	101,689	103,166	152	3.41	35.9	108,026
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.17	21.2	6.03	69.7	0.17	0.27	21.1	21.3	0.27	5.32	5.59	245	16,836	17,080	25.2	0.56	5.94	17,885

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	32.5	31.2	16.6	282	0.89	0.30	121	121	0.28	30.5	30.8	—	89,665	89,665	2.25	2.54	35.0	90,512
Area	18.8	91.7	10.6	181	0.07	0.81	—	0.81	0.83	—	0.83	0.00	11,931	11,931	0.24	0.03	—	11,945
Energy	1.60	0.80	13.8	6.79	0.09	1.10	—	1.10	1.10	—	1.10	—	18,283	18,283	1.53	0.03	—	18,331
Water	—	—	—	—	—	—	—	—	—	—	—	319	74.9	394	32.7	0.78	—	1,443
Waste	—	—	—	—	—	—	—	—	—	—	—	1,158	0.00	1,158	116	0.00	—	4,052
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	21.4	21.4
Total	52.9	124	41.0	470	1.04	2.21	121	123	2.21	30.5	32.7	1,477	119,954	121,431	152	3.37	56.4	126,304
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	32.5	31.1	18.4	257	0.84	0.30	121	121	0.28	30.5	30.8	—	84,692	84,692	2.46	2.72	0.91	85,565
Area	1.05	75.0	9.01	3.83	0.06	0.73	—	0.73	0.73	—	0.73	0.00	11,433	11,433	0.22	0.02	—	11,445
Energy	1.60	0.80	13.8	6.79	0.09	1.10	—	1.10	1.10	—	1.10	—	18,283	18,283	1.53	0.03	—	18,331
Water	—	—	—	—	—	—	—	—	—	—	—	319	74.9	394	32.7	0.78	—	1,443
Waste	—	—	—	—	—	—	—	—	—	—	—	1,158	0.00	1,158	116	0.00	—	4,052
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	21.4	21.4
Total	35.2	107	41.2	268	0.98	2.13	121	123	2.11	30.5	32.6	1,477	114,483	115,960	153	3.55	22.3	120,857
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	30.9	29.6	17.6	254	0.81	0.29	115	116	0.26	29.2	29.4	—	82,207	82,207	2.31	2.60	14.4	83,053
Area	12.2	85.9	1.72	121	0.01	0.10	—	0.10	0.12	—	0.12	0.00	1,124	1,124	0.03	< 0.005	—	1,126
Energy	1.60	0.80	13.8	6.79	0.09	1.10	—	1.10	1.10	—	1.10	—	18,283	18,283	1.53	0.03	—	18,331
Water	—	—	—	—	—	—	—	—	—	—	—	319	74.9	394	32.7	0.78	—	1,443

Waste	—	—	—	—	—	—	—	—	—	—	—	1,158	0.00	1,158	116	0.00	—	4,052
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	21.4	21.4
Total	44.8	116	33.1	382	0.91	1.49	115	117	1.49	29.2	30.7	1,477	101,689	103,166	152	3.41	35.9	108,026
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.64	5.40	3.21	46.3	0.15	0.05	21.1	21.1	0.05	5.32	5.37	—	13,610	13,610	0.38	0.43	2.39	13,750
Area	2.23	15.7	0.31	22.2	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	186	186	< 0.005	< 0.005	—	186
Energy	0.29	0.15	2.51	1.24	0.02	0.20	—	0.20	0.20	—	0.20	—	3,027	3,027	0.25	0.01	—	3,035
Water	—	—	—	—	—	—	—	—	—	—	—	52.8	12.4	65.2	5.41	0.13	—	239
Waste	—	—	—	—	—	—	—	—	—	—	—	192	0.00	192	19.2	0.00	—	671
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.55	3.55
Total	8.17	21.2	6.03	69.7	0.17	0.27	21.1	21.3	0.27	5.32	5.59	245	16,836	17,080	25.2	0.56	5.94	17,885

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	22.1	21.2	11.3	192	0.60	0.20	82.2	82.4	0.19	20.8	21.0	—	61,010	61,010	1.53	1.73	23.8	61,586
Apartments Mid Rise	6.30	6.05	3.23	54.8	0.17	0.06	23.5	23.5	0.05	5.93	5.98	—	17,406	17,406	0.44	0.49	6.80	17,571
Strip Mall	3.34	3.21	1.71	29.0	0.09	0.03	12.4	12.5	0.03	3.14	3.17	—	9,225	9,225	0.23	0.26	3.60	9,312

General Office Building	0.73	0.70	0.38	6.37	0.02	0.01	2.73	2.73	0.01	0.69	0.70	—	2,024	2,024	0.05	0.06	0.79	2,043
Total	32.5	31.2	16.6	282	0.89	0.30	121	121	0.28	30.5	30.8	—	89,665	89,665	2.25	2.54	35.0	90,512
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	22.1	21.2	12.5	175	0.57	0.20	82.2	82.4	0.19	20.8	21.0	—	57,626	57,626	1.67	1.85	0.62	58,220
Apartments Mid Rise	6.31	6.04	3.58	50.0	0.16	0.06	23.5	23.5	0.05	5.93	5.98	—	16,441	16,441	0.48	0.53	0.18	16,610
Strip Mall	3.35	3.20	1.90	26.5	0.09	0.03	12.4	12.5	0.03	3.14	3.17	—	8,713	8,713	0.25	0.28	0.09	8,803
General Office Building	0.73	0.70	0.42	5.81	0.02	0.01	2.73	2.73	0.01	0.69	0.70	—	1,912	1,912	0.06	0.06	0.02	1,931
Total	32.5	31.1	18.4	257	0.84	0.30	121	121	0.28	30.5	30.8	—	84,692	84,692	2.46	2.72	0.91	85,565
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	3.93	3.76	2.23	32.2	0.10	0.04	14.7	14.7	0.03	3.71	3.74	—	9,475	9,475	0.27	0.30	1.67	9,572
Apartments Mid Rise	1.09	1.04	0.62	8.93	0.03	0.01	4.07	4.08	0.01	1.03	1.04	—	2,627	2,627	0.07	0.08	0.46	2,654
Strip Mall	0.52	0.50	0.30	4.30	0.01	< 0.005	1.96	1.96	< 0.005	0.49	0.50	—	1,265	1,265	0.04	0.04	0.22	1,278
General Office Building	0.10	0.10	0.06	0.83	< 0.005	< 0.005	0.38	0.38	< 0.005	0.10	0.10	—	244	244	0.01	0.01	0.04	246
Total	5.64	5.40	3.21	46.3	0.15	0.05	21.1	21.1	0.05	5.32	5.37	—	13,610	13,610	0.38	0.43	2.39	13,750

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	198	198	0.00	0.00	—	198
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	433	433	0.00	0.00	—	433
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	67.5	67.5	0.00	0.00	—	67.5
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	283	283	0.00	0.00	—	283
Total	—	—	—	—	—	—	—	—	—	—	—	—	981	981	0.00	0.00	—	981
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	198	198	0.00	0.00	—	198
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	433	433	0.00	0.00	—	433
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	67.5	67.5	0.00	0.00	—	67.5
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	283	283	0.00	0.00	—	283
Total	—	—	—	—	—	—	—	—	—	—	—	—	981	981	0.00	0.00	—	981
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	32.8	32.8	0.00	0.00	—	32.8
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	71.6	71.6	0.00	0.00	—	71.6
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	11.2	11.2	0.00	0.00	—	11.2
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	46.8	46.8	0.00	0.00	—	46.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	162	162	0.00	0.00	—	162

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.62	0.31	5.26	2.24	0.03	0.42	—	0.42	0.42	—	0.42	—	6,671	6,671	0.59	0.01	—	6,690
Apartments Mid Rise	0.73	0.37	6.26	2.66	0.04	0.51	—	0.51	0.51	—	0.51	—	7,945	7,945	0.70	0.01	—	7,967
Strip Mall	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	249	249	0.02	< 0.005	—	250
General Office Building	0.22	0.11	2.04	1.72	0.01	0.16	—	0.16	0.16	—	0.16	—	2,437	2,437	0.22	< 0.005	—	2,444
Total	1.60	0.80	13.8	6.79	0.09	1.10	—	1.10	1.10	—	1.10	—	17,303	17,303	1.53	0.03	—	17,351
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	0.62	0.31	5.26	2.24	0.03	0.42	—	0.42	0.42	—	0.42	—	6,671	6,671	0.59	0.01	—	6,690
Apartments Mid Rise	0.73	0.37	6.26	2.66	0.04	0.51	—	0.51	0.51	—	0.51	—	7,945	7,945	0.70	0.01	—	7,967
Strip Mall	0.02	0.01	0.21	0.18	< 0.005	0.02	—	0.02	0.02	—	0.02	—	249	249	0.02	< 0.005	—	250
General Office Building	0.22	0.11	2.04	1.72	0.01	0.16	—	0.16	0.16	—	0.16	—	2,437	2,437	0.22	< 0.005	—	2,444
Total	1.60	0.80	13.8	6.79	0.09	1.10	—	1.10	1.10	—	1.10	—	17,303	17,303	1.53	0.03	—	17,351
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	0.11	0.06	0.96	0.41	0.01	0.08	—	0.08	0.08	—	0.08	—	1,105	1,105	0.10	< 0.005	—	1,108
Apartments Mid Rise	0.13	0.07	1.14	0.49	0.01	0.09	—	0.09	0.09	—	0.09	—	1,315	1,315	0.12	< 0.005	—	1,319
Strip Mall	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	41.3	41.3	< 0.005	< 0.005	—	41.4
General Office Building	0.04	0.02	0.37	0.31	< 0.005	0.03	—	0.03	0.03	—	0.03	—	403	403	0.04	< 0.005	—	405
Total	0.29	0.15	2.51	1.24	0.02	0.20	—	0.20	0.20	—	0.20	—	2,865	2,865	0.25	0.01	—	2,873

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.05	0.53	9.01	3.83	0.06	0.73	—	0.73	0.73	—	0.73	0.00	11,433	11,433	0.22	0.02	—	11,445

Consum Products	—	68.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	5.85	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	17.8	16.7	1.61	177	0.01	0.08	—	0.08	0.10	—	0.10	—	498	498	0.02	< 0.005	—	500
Total	18.8	91.7	10.6	181	0.07	0.81	—	0.81	0.83	—	0.83	0.00	11,931	11,931	0.24	0.03	—	11,945
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1.05	0.53	9.01	3.83	0.06	0.73	—	0.73	0.73	—	0.73	0.00	11,433	11,433	0.22	0.02	—	11,445
Consumer Products	—	68.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	5.85	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	1.05	75.0	9.01	3.83	0.06	0.73	—	0.73	0.73	—	0.73	0.00	11,433	11,433	0.22	0.02	—	11,445
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.01	0.01	0.11	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01	0.00	130	130	< 0.005	< 0.005	—	130
Consumer Products	—	12.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	1.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.22	2.09	0.20	22.1	< 0.005	0.01	—	0.01	0.01	—	0.01	—	56.5	56.5	< 0.005	< 0.005	—	56.7
Total	2.23	15.7	0.31	22.2	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	186	186	< 0.005	< 0.005	—	186

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	38.8	21.1	59.9	3.98	0.09	—	188
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	159	31.0	190	16.3	0.39	—	715
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	18.5	3.49	21.9	1.89	0.04	—	82.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	102	19.3	121	10.5	0.25	—	458
Total	—	—	—	—	—	—	—	—	—	—	—	319	74.9	394	32.7	0.78	—	1,443
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	38.8	21.1	59.9	3.98	0.09	—	188
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	159	31.0	190	16.3	0.39	—	715
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	18.5	3.49	21.9	1.89	0.04	—	82.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	102	19.3	121	10.5	0.25	—	458
Total	—	—	—	—	—	—	—	—	—	—	—	319	74.9	394	32.7	0.78	—	1,443

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	6.42	3.50	9.92	0.66	0.02	—	31.0
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	26.4	5.14	31.5	2.71	0.06	—	118
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	3.05	0.58	3.63	0.31	0.01	—	13.7
General Office Building	—	—	—	—	—	—	—	—	—	—	—	16.9	3.19	20.1	1.73	0.04	—	75.7
Total	—	—	—	—	—	—	—	—	—	—	—	52.8	12.4	65.2	5.41	0.13	—	239

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	192	0.00	192	19.2	0.00	—	671
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	742	0.00	742	74.2	0.00	—	2,597
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	73.6	0.00	73.6	7.35	0.00	—	257
General Office Building	—	—	—	—	—	—	—	—	—	—	—	150	0.00	150	15.0	0.00	—	526
Total	—	—	—	—	—	—	—	—	—	—	—	1,158	0.00	1,158	116	0.00	—	4,052

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	192	0.00	192	19.2	0.00	—	671
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	742	0.00	742	74.2	0.00	—	2,597
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	73.6	0.00	73.6	7.35	0.00	—	257
General Office Building	—	—	—	—	—	—	—	—	—	—	—	150	0.00	150	15.0	0.00	—	526
Total	—	—	—	—	—	—	—	—	—	—	—	1,158	0.00	1,158	116	0.00	—	4,052
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	31.8	0.00	31.8	3.18	0.00	—	111
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	123	0.00	123	12.3	0.00	—	430
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	12.2	0.00	12.2	1.22	0.00	—	42.6
General Office Building	—	—	—	—	—	—	—	—	—	—	—	24.9	0.00	24.9	2.49	0.00	—	87.1
Total	—	—	—	—	—	—	—	—	—	—	—	192	0.00	192	19.2	0.00	—	671

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.89	3.89
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	16.0	16.0
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.81	0.81
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.73	0.73
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	21.4	21.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.89	3.89
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	16.0	16.0
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.81	0.81
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.73	0.73
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	21.4	21.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.64	0.64
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.65	2.65

Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.13	0.13
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.12	0.12
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.55	3.55

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	9,754	9,857	8,834	3,517,587	58,231	58,848	52,738	20,999,997
Apartments Mid Rise	5,625	5,067	4,218	1,950,577	33,579	30,248	25,184	11,644,943
Single Family Housing	9,753	9,857	8,833	3,517,433	58,228	58,849	52,732	20,999,072
Strip Mall	2,981	2,827	276	938,968	17,796	16,880	1,645	5,605,637
General Office Building	654	150	48.0	180,831	3,904	895	287	1,079,564

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—

Wood Fireplaces	0
Gas Fireplaces	246
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Wood Fireplaces	0
Gas Fireplaces	297
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
5619375	1,873,125	645,000	215,000	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	1,696,206	19.3	0.0000	0.0000	9,430,495

Apartments Mid Rise	8,182,142	19.3	0.0000	0.0000	24,790,473
Single Family Housing	2,047,858	19.3	0.0000	0.0000	11,385,598
Strip Mall	1,276,778	19.3	0.0000	0.0000	778,303
General Office Building	5,346,086	19.3	0.0000	0.0000	7,603,940

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	9,169,355	49,389,897
Apartments Mid Rise	83,195,122	3,825,906
Single Family Housing	11,070,319	0.00
Strip Mall	9,629,428	91,160
General Office Building	53,320,124	210,369

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	161	—
Apartments Mid Rise	1,377	—
Single Family Housing	195	—
Strip Mall	137	—
General Office Building	279	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	15.4	annual days of extreme heat
Extreme Precipitation	7.00	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	0	0	N/A

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	71.7
AQ-PM	59.2
AQ-DPM	88.5
Drinking Water	87.2
Lead Risk Housing	73.0
Pesticides	0.00
Toxic Releases	69.1
Traffic	69.4
Effect Indicators	—
CleanUp Sites	54.3
Groundwater	14.9
Haz Waste Facilities/Generators	38.7
Impaired Water Bodies	33.2
Solid Waste	52.9
Sensitive Population	—
Asthma	9.70
Cardio-vascular	6.54
Low Birth Weights	24.3
Socioeconomic Factor Indicators	—
Education	16.2
Housing	56.5

Linguistic	46.0
Poverty	29.2
Unemployment	51.3

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	68.77967407
Employed	91.37687668
Median HI	58.24457847
Education	—
Bachelor's or higher	85.38431926
High school enrollment	100
Preschool enrollment	59.16848454
Transportation	—
Auto Access	53.75336841
Active commuting	70.76863852
Social	—
2-parent households	61.91453869
Voting	76.97934043
Neighborhood	—
Alcohol availability	46.27229565
Park access	50.48120108
Retail density	80.73912486
Supermarket access	80.11035545
Tree canopy	90.63261902

Housing	—
Homeownership	17.51571924
Housing habitability	44.87360452
Low-inc homeowner severe housing cost burden	83.60066727
Low-inc renter severe housing cost burden	79.18644938
Uncrowded housing	58.74502759
Health Outcomes	—
Insured adults	52.90645451
Arthritis	0.0
Asthma ER Admissions	98.1
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	41.7
Cognitively Disabled	74.6
Physically Disabled	54.0
Heart Attack ER Admissions	95.3
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	40.5
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—

Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	19.9
Elderly	61.3
English Speaking	74.0
Foreign-born	48.3
Outdoor Workers	58.4
Climate Change Adaptive Capacity	—
Impervious Surface Cover	59.6
Traffic Density	60.6
Traffic Access	56.5
Other Indices	—
Hardship	18.2
Other Decision Support	—
2016 Voting	65.4

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	35.0
Healthy Places Index Score for Project Location (b)	77.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	CO2e intensity based on SCE 100% renewable in 2045 and South Pasadena 82.4% on CPA 100% Clean Power
Land Use	Land Use - Population per GPU 555 single family are ADU
Operations: Vehicle Data	Vehicle Trips - Trip rates and distances modified to yield results from TAZ-based TIA
Operations: Hearths	Woodstoves - No woodstoves or wood fireplaces per SCAQMD Gas FP in all SFR; none in MFR
Operations: Fleet Mix	Fleet mix adjusted based on information provided in TIA.

APPENDIX C-1

CULTURAL RESOURCES RECORD SEARCH

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-00112		1974	D'Altroy, Terence N.	Impact on Archaeological Resources of Proposed Upgrading Ramps on the Pasadena Freeway	University of California, Los Angeles Archaeological Survey	
LA-00115		1974	Clewlow, William C. Jr.	Evaluation of the Archaeological Resources and Potential Impact of Proposed Extension of the Long Beach Freeway (rt. 7) North From Valley Blvd. to Rt. 210 (colorado Freeway)	University of California, Los Angeles Archaeological Survey	
LA-01319		1983	Romani, John F.	Archaeological Survey Report for Two Proposed Disposal Sites 07-la 7 Routes 10 to 210 07-204-020090	Caltrans	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-03440		1994	Kane, Diane	Third Supplemental Historic Architectural Survey Report 710 Freeway Gap Closure Report (07-la 710, 26.5/r32.7 Ea 07-020090) Volume Ii: Pasadena Avenue District Re-evaluation	Caltrans District 7: Environmental Planning Branch	19-150039, 19-150040, 19-150041, 19-150042, 19-150043, 19-150044, 19-150045, 19-150046, 19-150047, 19-150048, 19-150049, 19-150050, 19-150051, 19-150052, 19-150053, 19-150054, 19-150055, 19-150056, 19-150057, 19-150058, 19-150059, 19-150060, 19-150061, 19-150062, 19-150063, 19-150064, 19-150065, 19-150066, 19-150067, 19-150068, 19-150069, 19-150070, 19-150071, 19-150072, 19-150073, 19-150074, 19-150075, 19-150076, 19-150077, 19-150078, 19-150079, 19-150080, 19-150081, 19-150082, 19-150083, 19-150084, 19-150085, 19-150086, 19-150087, 19-150088, 19-150089, 19-150090, 19-150091, 19-150092, 19-150093, 19-150094, 19-150095, 19-150096, 19-150097, 19-150098, 19-150099, 19-150100, 19-150101, 19-150102, 19-150103, 19-150104, 19-150105, 19-150106, 19-150107, 19-150108, 19-150109, 19-150110, 19-150111, 19-150112, 19-150113, 19-150114, 19-150115, 19-150116, 19-150117, 19-150118, 19-150119, 19-150120, 19-150121, 19-150122, 19-150123, 19-150124, 19-150125, 19-150126, 19-150127, 19-150128, 19-150129, 19-150130, 19-150131, 19-150132, 19-150133, 19-150134, 19-150135, 19-150136, 19-150137, 19-150138, 19-150139, 19-150140, 19-150141, 19-150142, 19-150143, 19-150368, 19-150370, 19-150371, 19-150372, 19-150373, 19-150374, 19-150375, 19-150376, 19-150377, 19-150378, 19-150379, 19-150380, 19-150381, 19-155886, 19-155887, 19-155888, 19-155889, 19-155891, 19-155892, 19-155894, 19-155897, 19-155898, 19-155900, 19-155901, 19-155902, 19-155903, 19-155904, 19-155905, 19-155906, 19-155908, 19-155909, 19-155910, 19-155913,

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
						19-155914, 19-155915, 19-155917, 19-155918, 19-155919, 19-155920, 19-155921, 19-155922, 19-155923, 19-155924, 19-155925, 19-155928, 19-155929, 19-155930, 19-155931, 19-155932, 19-155933, 19-155935, 19-155936, 19-155937, 19-155938, 19-155939, 19-155940, 19-155942, 19-155943, 19-155944, 19-155945, 19-155946, 19-155947, 19-155948, 19-155949, 19-155950, 19-155951, 19-156643, 19-175665, 19-175669, 19-175673, 19-175674, 19-175682, 19-175687, 19-175690, 19-175696, 19-175700, 19-175701, 19-175731, 19-175734, 19-175736, 19-184979
LA-03497		1994	Anonymous	Draft Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.	
LA-03498		1994	Anonymous	Final Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project	Tetra Tech, Inc.	
LA-03498A			Saurenman, Hugh	Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System	Harris Miller Miller & Hanson Inc	
LA-04216		1900	Holmes, William Henry	Report of the US National Museum Under the Direction of the Smithsonian Institute for the Year Ending June 30, 1900	The Smithsonian Institute	
LA-04386		1993	Anonymous	Cultural Resources Overview Los Angeles County Metropolitan Transportation Authority's Interstate Commerce Commission Abandonment Exemption Pasadena-Los Angeles Light Rail Transit Project	Caltrans	
LA-04451		1983	Anonymous	Route 7 Environmental Impact Statement Supplement	Caltrans	19-179484, 19-179518, 19-179524, 19-179529, 19-179530, 19-179531, 19-179561, 19-179610, 19-179614, 19-179618
LA-04638		1999	Duke, Curt	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 948-01, in the County of Los Angeles, California	LSA Associates, Inc.	
LA-04890		2000	Storey, Noelle	Negative Archaeological Survey Report, Highway Project Description	Caltrans District 7	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-04909		2000	Atchley, Sara M.	Cultural Resources Investigation for the Nextlink Fiber Optic Project, Los Angeles and Orange Counties, California	Jones & Stokes	
LA-05132		1999	McKenna, Jeanette A.	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 1319 and 1921 Fremont Avenue, South Pasadena, Los Angeles County, California	McKenna et al.	
LA-05421		2000	Sylvia, Barbara	Negative Archaeological Survey Report: 07-la-110-07-174-965120	Caltrans District 7	
LA-05434		2001	McKenna, Jeanette A.	A Phase I Cultural Resources Investigation and Architectural Evaluation of Properties Located at 809 and 813 Meridian Avenue, South Pasadena, Los Angeles County, California	Mc Kenna et al.	
LA-06334		2002	Kinkella, Andrew	Below the Basketball Court: Burial Recovery at Arroyo Seco Park	Greenwood and Associates	
LA-06362		1994	Borg, Roger	Finding of Effect on Historic Properties Arroyo Seco Parkway and Four Level Interchange	Caltrans District 7	
LA-06385		2001	McAvoy, Christy J.	Section 106 Review for 5568 Via Marison Avenue Arroyo Seco Park Historic District Los Angeles, Ca	Historic Resources Group	19-189325, 19-189326
LA-06835		2003	Harper, Caprice D.	Cultural Resource Assessment Cingular Wreless Facility No. Vy311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.	
LA-06839		2003	Hale, Alice E.	Burial Data Summary Arroyo Seco/san Pascual Park Los Angeles, California	Greenwood and Associates	19-003057
LA-07426		2004	McMorris, Christopher	Caltrans Historic Bridges Inventory Update: Concrete Arch Bridges	JRP Historical Consulting	19-150195, 19-192481, 19-192482, 19-192483, 19-192484, 19-192485, 19-192486
LA-07553		2004	Fulton, Terri	Cultural Resource Assessment Cingular Wireless Facility No. Vy 311-01 South Pasadena, Los Angeles County, California	LSA Associates, Inc.	
LA-08526		2004	Unknown	Historic Resources Report, 258-266 Monterey Road, South Pasadena, California	San Buenaventura Research Associates	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-08542		2004	Bonner, Wayne H.	Cultural Resource Records Search Results and Site Visit for Cingular Wireless Facility Candidate Sb-390-01 (bilicke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	Michael Brandman Associates	
LA-08634		2007	Anonymous	Cultural Resources Study of the Arroyo Seco Park Project, Royal Street Communications Site No. La0108b, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates	19-003057
LA-08928		2007	McKenna, Jeanette A.	A Phase I (ceqa) and Class Iii (nepa) Cultural Resources Investigation for the Lower Arroyo Seco Trail and Trailhead Improvements Project Area in the City of Pasadena, Los Angeles County, California	McKenna et al.	19-003057, 19-180037
LA-08948		2007	Lajoie, Glenn and Starla Hack	Public Review Draft Environmental Impact Report, Downtown Revitalization Project, Sch No. 2007031024	RBF Consulting	
LA-09098		2006	Bonner, Wayne H.	Extended Phase I Testing for Cingular Wireless Facility Candidate 950-014-198e/lsanca0336 (arroyo Park) Arroyo Seco Park, South Pasadena, Los Angeles County, California	Michael Brandman Associates	19-003057
LA-09099		2005	Bonner, Wayne H.	Cultural Resources Records Search Results and Site Visit for Cingular Wireless Site 950-014-198e (city Park) Arroyo Park, Near Intersection of Comet Street and Pasqual Avenue, South Pasadena, Los Angeles County, California	Michael Brandman Associates	19-003057
LA-09489		2003	Lee, Portia	Arroyo Seco Parkway Historic District	California Archives	19-179645
LA-09601		2008	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for AT&T Candidate SV0061-01 (OG Park), 820 El Centro Street, South Pasadena, Los Angeles County, California.	Michael Brandman Associates	19-003057
LA-10209		2004	English, John	Finding of Effect Report for the Raymond Ave. To SR110 Connector Project, Los Angeles County, CA	Myra L. Frank & Associates, Inc	

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-10388		2009	Bonner, Wayne H. and Kathleen A. Crawford	Direct APE Historic Architectural Assessment for Clearwire Candidate CA-LOS0099A/LA03XC129A (S. Pasadena Water Tank), 700 S. La Portada, South Pasadena, Los Angeles County, California	MBA	19-188513
LA-10541	OHP PRN - FHWA040514A	2005	Dolan, Christy and Monica Strauss	Finding of Effect for the Proposed Arroyo Seco Bike Path, Los Angeles County, California	EDAW, Inc.	19-003100, 19-003101, 19-003102, 19-186110, 19-186721, 19-186858, 19-186859
LA-10541A		2003	Monica Strauss and Christy Dolan	Historic Property Survey Report Proposed Arroyo Seco Bike Path County Of Los Angeles, California	EDAW	
LA-10541B		2003	Monica Strauss and Christy Dolan	Arroyo Seco Bike Path Historic Resources Evaluation Report HRER - Appendix 1	EDAW	
LA-10541C		2004	OHP - Steve Mikesell acting SHPO	HPSR / Determinations of Eligibility for Arroyo Seco Bike Path Project	Caltrans	
LA-10576		2004	Greenwood, David	Historic Property Suvey Report for the Raymond Avenue to SR 110 Connector project for the Raymond Avenue to SR 110 Connector Project	Myra L. Frank & Associates, Inc.	19-179645, 19-184719, 19-184723, 19-188719, 19-188766, 19-188767
LA-10866		2007	Supernowicz, Dana	Cultural Resources Study of the Arroyo Seco Park Project Royal Street Communications Site No. LA0108B, Stoney Drive, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates	19-003057, 19-179332, 19-179484, 19-179645, 19-186859
LA-11231		2009	Meiser, M.K.	Historic American Engineering Record Arroyo Seco Flood Control Channel, Los Angeles County, California	EDAW, Inc.	19-186859
LA-11529		2008	Castanon, David	Arroyo Seco Channel Project in the cities of Los Angeles and Pasadena, Los Angeles County, California	Department of the Army	19-186859
LA-11554		2000	Lee, Portia	Historic Resources Evaluation Report and Finding of No Adverse Effect for Oaklawn Bridge =, City of South Pasadena Seismic Retrofit and Historic Restoration Project	California Archives	19-179486
LA-11650		2011	Bonner,Wayne	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidiate IE24844-G (Stein Rooftop), 1959 Huntington Drive, Alhambra, Los Angeles County, California	Michael Brandman Associates	19-189957

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Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-12060		2012	Supernowicz, Dana	Cultural Resources Study of the South Pasadena Water Tank Project, MetroPCS California, LLC Site No. MLAX04166, 700 La Portdada Street, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates	19-150041, 19-150042, 19-179475, 19-179524, 19-179525, 19-179530, 19-179610, 19-179614, 19-179617, 19-179649, 19-179650, 19-188513
LA-12221		2012	Bonner, Wayne, Williams, Sarah, and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04862A (SB390 Billcke Water Tank) 700 La Portada, South Pasadena, Los Angeles County, California	mBA	19-150041, 19-150042, 19-179475, 19-179523, 19-179525, 19-179530, 19-179617, 19-179649
LA-12422		2013	Tibbit, Casey and Goodwin, Riordan	Cultural Resources Assessment Arroyo Seco Pedestrian and Bicycle Path Project Cities of South Pasadena and Los Angeles Los Angeles County, California	Lsa	19-190613
LA-12423		2013	Bonner, Wayne and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate IE04948A (LA948 Sinclair) 1499 Huntington Drive, South Pasadena, Los Angeles County, California	MBA	19-190632
LA-13148		2013	Comeau, Brad	Initial Study/Mitigated Negative Declaration Sewer Rehabilitation and Replacement Project	DUDEK	

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-003057	CA-LAN-003057	Resource Name - Arroyo Seco / San Pascual Site	Site	Prehistoric	AP02; AP09	2002 (John M. Foster, Greenwood & Associates)	LA-06839, LA-08634, LA-08928, LA-09098, LA-09099, LA-09601, LA-10866
P-19-150039		OHP Property Number - 116020; Resource Name - Whitney & Virginia Smith House	Building	Historic	HP02	1993 (Anne Schield, Caltrans)	LA-03440
P-19-150040		OHP Property Number - 102633; Resource Name - Warren D House	Building	Historic	HP02	1994 (D. Kane, Caltrans)	LA-03440
P-19-150041		OHP Property Number - 116021; Resource Name - East Wynyate	Building	Historic	HP02	1993 (Anne Schield, Cal Trans)	LA-03440, LA-12060, LA-12221
P-19-150042		OHP Property Number - 116022; Resource Name - Otake/Nambu House	Building	Historic	HP02	1994 (Anne Schield, Caltrans)	LA-03440, LA-12060, LA-12221
P-19-150075		OHP Property Number - 116029; Resource Name - Stimson Historic District; Voided - 19-185128	District	Historic	HP02; HP39	1994 (D. Kane, Caktrans)	LA-03440
P-19-150078		OHP Property Number - 030300; Resource Name - Stone/Brooks House; Voided - 19-179611	Building, Element of district	Historic	HP02	1993 (A. Scheid, Caltrans)	LA-03440
P-19-150079		OHP Property Number - 030301; Resource Name - Henry Stephen Boice House; Voided - 19-179612	Building, Element of district	Historic	HP02	1993 (A. Scheid, Caltrans)	LA-03440
P-19-150080		OHP Property Number - 030302; Resource Name - Frank P O'Connor House; Voided - 19-179613	Building, Element of district	Historic	HP02	1994 (A. Scheid, Caltrans)	LA-03440
P-19-179471		OHP Property Number - 030160; Resource Name - Leo Longley House	Building	Historic	HP02	1977 (Tom Sitton, Natural History Museum)	
P-19-179472		OHP Property Number - 030161; Resource Name - William Cooper House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179473		OHP Property Number - 030162; Resource Name - Anna B McKay House; Other - Marins S Daniels House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179474		OHP Property Number - 030163; Resource Name - Porter House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179475		OHP Property Number - 030164; Resource Name - South Pasadena School	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	LA-12060, LA-12221
P-19-179476		OHP Property Number - 030165; Resource Name - Raymopnd Hill Waiting Station; Other - SW Fair Oaks Ave & Raymond Hill Rd	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179477		OHP Property Number - 030166; Resource Name - Kate Plumb House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179478		OHP Property Number - 030167; Resource Name - Kate A White House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179479		OHP Property Number - 030168; Resource Name - A S Hoyt House	Building, Element of district	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179481		OHP Property Number - 030170; Resource Name - Williams-Perrin House; Other - Charles P Williams House	Building, Element of district	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179482		OHP Property Number - 030171; Resource Name - Garfield House; Other - Mrs Lucretia R Garfield House; Other - Mrs James A Garfield House	Building, Element of district	Historic	HP02	1973 (M L Fey, South Pasadena Cultural Heritage Commission)	
P-19-179483		OHP Property Number - 030172; Resource Name - Howard Longley House	Building, Element of district	Historic	HP02	1973 (M L Fey, South Pasadena Cultural Heritage Commission)	
P-19-179484		OHP Property Number - 030173; Resource Name - Buean Vista District	District	Historic	HP02	1976 (Lois M. Webb, Cal Trans)	LA-04451, LA-10866

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179486		OHP Property Number - 030175; Resource Name - Oaklawn Bridge & Waiting Station	Building, Structure, Element of district	Historic	HP04; HP19	1972 (M L Fey, South Pasadena Cultural Heritage Commission); 2000 (Daniel Abeyta, OHP); 2001 (Dan Peterson, Avila Tom Architects); 2001 (Glen Duncan, S. Pasadena Cultural Heritage Commission)	LA-11554
P-19-179499		OHP Property Number - 030188; Resource Name - Oaklawn District; Other - Oak Lawn Place	District	Historic	HP02	1976 (L Webb, CA Department of Transportation); 2008 (Robert J. Magiligan)	
P-19-179500		OHP Property Number - 030189; Resource Name - Seymour House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179501		OHP Property Number - 030190; Resource Name - J R Riggins House, Gertmenian House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum); 1985 (John W. Snyder, Caltrans)	
P-19-179502		OHP Property Number - 030191; Resource Name - Alexander Block	Building, Element of district	Historic	HP02	1977 (T Sitton, Natural History Museum)	
P-19-179503		OHP Property Number - 030192; Resource Name - Graham Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179505		OHP Property Number - 030194; Resource Name - Shapiro Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179506		OHP Property Number - 030195; Resource Name - Edwards & Faw Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179509		OHP Property Number - 030198; Resource Name - Herlihy Block; Other - South Pasadena Review Bldg	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179510		OHP Property Number - 030199; Resource Name - Taylor Block	Building, Element of district	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179516		OHP Property Number - 030205; Resource Name - Mission Hotel	Building, Element of district	Historic	HP05	1977 (T Sitton, Natural History Museum)	

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179518		OHP Property Number - 030207; Resource Name - South Pasadena Historic District; Resource Name - Mission West District	District	Historic	HP06; HP15	1976 (L Webb, CA Department of Transportation); 1977 (T Sitton, Natural History Museum)	LA-04451
P-19-179519		OHP Property Number - 030208; Resource Name - Jacobs Block	Building	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179520		OHP Property Number - 030209; Resource Name - Fremont Ave Brethren Church	Building	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179521		OHP Property Number - 030210; Resource Name - Rialto Theater	Building, Element of district	Historic	HP10	1977 (R Hatheway, Natural History Museum); 1977 (R Shryock)	
P-19-179522		OHP Property Number - 030211; Resource Name - War Memorial Bldg	Building	Historic	HP06	1977 (T Sitton, Natural History Museum)	
P-19-179523		OHP Property Number - 030212; Resource Name - South Pasadena High School Administration Bldg; Other - South Pasadena School District Office	Building	Historic	HP15	1977 (T Sitton, Natural History Museum)	LA-12221
P-19-179524		OHP Property Number - 030213; Resource Name - A A Mitchell House, Dieterle House, Wilson House; Other - Albert A Mitchell House; Other - Wililam Dieterle House; Other - Wilson House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum); 1982 (John Snyder, Caltrans)	LA-04451, LA-12060
P-19-179525		OHP Property Number - 030214; Resource Name - A C Bilicke House; Other - South Pasadena Methodist Church	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	LA-12060, LA-12221
P-19-179526		OHP Property Number - 030215; Resource Name - St James Episcopal	Building	Historic	HP16	1977 (T Sitton, Natural History Museum)	
P-19-179527		OHP Property Number - 030216; Resource Name - Tanner House	Building	Historic	HP02	1977 (T Sitton, Natural History Museum)	

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179528		OHP Property Number - 030217; Resource Name - Grokowsky House	Building	Historic	HP02	1976 (L M Webb & A Cole, CA Department of Transportation)	
P-19-179529		OHP Property Number - 030218; Resource Name - Sherry House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451
P-19-179530		OHP Property Number - 030219; Resource Name - Kenneth W Joy House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451, LA-12060, LA-12221
P-19-179531		OHP Property Number - 030220; Resource Name - The Captain's House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451
P-19-179561		OHP Property Number - 030250; Resource Name - North of Mission District; Voided - 19-179647	District	Historic	HP02	1982 (J Snyder, DOTP Clatrans)	LA-04451
P-19-179610		OHP Property Number - 030299; Resource Name - South of Mission District; Voided - 19-179648	District	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451, LA-12060
P-19-179614		OHP Property Number - 030303; Resource Name - J G Pierce House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451, LA-12060
P-19-179615		OHP Property Number - 030304; Resource Name - Miltimore House	Building	Historic	HP02	1970 (E McCoy, UCSB/UCLA)	
P-19-179616		OHP Property Number - 030305; Resource Name - Adobe Flores; Other - La Casa de Jose Perez	Building	Historic	HP44	1972 (M Fay, South Pasadena Cultural Heritage Commission)	
P-19-179617		OHP Property Number - 030306; Resource Name - Wynyate; Other - Welsh for Vineyard	Building	Historic	HP02	1973 (Margaret Leslie Fay, S. Pasadena Cultural Heritage Commission)	LA-12060, LA-12221
P-19-179618		OHP Property Number - 030307; Resource Name - Tanner House	Building	Historic	HP02	1982 (J Snyder, DOTP Caltrans)	LA-04451
P-19-179645		OHP Property Number - 030334; Resource Name - Arroyo Seco Parkway Historic District; Other - SR-110 Pasadena Freeway, Arroyo Seco Freeway; OHP Property Number - 177126; National Register - NPS-10001198-9999	Structure, District	Historic	HP37	1982 (Snyder, John W., Cal Trans); 2003 (David Greenwood, Myra L. Frank & Assoc.); 2008 (Janice Calpo, Cal Trans)	LA-09489, LA-10576, LA-10866, LA-11404, LA-12526, VN-03153

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179649		OHP Property Number - 030339; Resource Name - 1100 Loma Vista Ct; OHP Property Number - 064983	Building	Historic	HP02	1986 (J. Triem, McClelland Engineers)	LA-12060, LA-12221
P-19-179650		OHP Property Number - 030340; Resource Name - Swimming Pool Bldg; Other - Plunge	Building	Historic	HP09	1986 (J Snyder, Caltrans)	LA-12060
P-19-179651		OHP Property Number - 030342; Resource Name - Edward Hall House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179652		OHP Property Number - 030343; Resource Name - E C Emmons House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179653		OHP Property Number - 030344; Resource Name - 1002 Highland St	Building	Historic	HP02	1985 (J. Snyder, Caltrans)	
P-19-179654		OHP Property Number - 030345; Resource Name - 1004 Highland St	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179655		OHP Property Number - 030346; Resource Name - Anna S Breed House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179656		OHP Property Number - 030347; Resource Name - Drachmann House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179657		OHP Property Number - 030348; Resource Name - Groetzinger House; Other - Ruddock House	Building	Historic	HP02	1986 (J Snyder, Caltrans)	
P-19-179658		OHP Property Number - 030349; Resource Name - 629 Grand Ave	Building	Historic	HP02	1985 (J snyder, Caltrans)	
P-19-179659		OHP Property Number - 030350; Resource Name - Thomson House; Other - Garrison House; OHP Property Number - 064905	Building	Historic	HP02	1986 (J Snyder, Caltrans)	

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Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179660		OHP Property Number - 030351; Resource Name - 400 Prospect Circle; OHP Property Number - 149742	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179661		OHP Property Number - 030352; Resource Name - Mrs E E Ambrose House; OHP Property Number - 149744	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179662		OHP Property Number - 030353; Resource Name - 420 Prospect Circle; OHP Property Number - 149747	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179663		OHP Property Number - 030354; Resource Name - R L Gabriel House; Other - Percy & Emogene Griffin House; OHP Property Number - 149749	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179664		OHP Property Number - 030355; Resource Name - 902 Buena Vista	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179665		OHP Property Number - 030356; Resource Name - R L Spayde House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179666		OHP Property Number - 030357; Resource Name - Jessie Waterman House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179667		OHP Property Number - 030358; Resource Name - P A Reid House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179668		OHP Property Number - 030359; Resource Name - Donald E Marquis House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179669		OHP Property Number - 030360; Resource Name - Kenneth A Gabriel House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179670		OHP Property Number - 030361; Resource Name - P Tully House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179671		OHP Property Number - 030362; Resource Name - Stillman B Jameson House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179672		OHP Property Number - 030363; Resource Name - 310 Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179673		OHP Property Number - 030364; Resource Name - D C Smith House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179674		OHP Property Number - 030365; Resource Name - 330 Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179675		OHP Property Number - 030366; Resource Name - 340 Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179676		OHP Property Number - 030367; Resource Name - 441 Prospect Circle; OHP Property Number - 149751	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179677		OHP Property Number - 030368; Resource Name - Lucian M Williams House; OHP Property Number - 149750	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179678		OHP Property Number - 030369; Resource Name - Percy & Emogene Griffin House; OHP Property Number - 149749	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179679		OHP Property Number - 030370; Resource Name - A C Buttalph Jr House; OHP Property Number - 149748	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179680		OHP Property Number - 030371; Resource Name - Edward Byrne House; OHP Property Number - 149743	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179681		OHP Property Number - 030372; Resource Name - Marie Emry House; OHP Property Number - 149755	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179682		OHP Property Number - 030373; Resource Name - H A Wilcox House; OHP Property Number - 149754	Building	Historic	HP02	1985 (J Snyder, Caltrans)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-179683		OHP Property Number - 030374; Resource Name - 461 Prospect Circle; OHP Property Number - 149753	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179684		OHP Property Number - 030375; Resource Name - 451 Prospect Circle; OHP Property Number - 149752	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179685		OHP Property Number - 030376; Resource Name - T L Stearns House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179686		OHP Property Number - 030378; Resource Name - M Brokaw House	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179687		OHP Property Number - 030378; Resource Name - C E Tracy House; OHP Property Number - 149737	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179688		OHP Property Number - 030379; Resource Name - 430 S Orange Grove Ave	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179689		OHP Property Number - 030380; Resource Name - R L Langer House; OHP Property Number - 149738	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179690		OHP Property Number - 030381; Resource Name - I F Gordon House; OHP Property Number - 149739	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179691		OHP Property Number - 030382; Resource Name - J F Gordon House; OHP Property Number - 149740	Building	Historic	HP02	1985 (J Snyder, Caltrans)	
P-19-179692		OHP Property Number - 030383; Resource Name - Prospect Circle District; OHP Property Number - 149735	District	Historic		1985 (J Snyder, Caltrans)	

Resource List

Primary No.	Trinomial	Other IDs	Type	Age	Attribute codes	Recorded by	Reports
P-19-186859		Resource Name - Arroyo Seco Flood Control Channel; OHP Property Number - 147051 status code (2S2); OHP Property Number - 173825 status code (6X); National Register - NPS-08000579-0027	Structure, Element of district	Historic	HP11; HP20	2003 (M. Strauss, EDAW)	LA-08736, LA-09105, LA-09351, LA-09561, LA-10270, LA-10541, LA-10638, LA-10713, LA-10834, LA-10866, LA-10938, LA-11231, LA-11336, LA-11387, LA-11529, LA-11625, LA-11802, LA-11953, LA-12427, LA-12428, LA-12526, LA-12714, VN-03153
P-19-187627		OHP Property Number - 126436; Resource Name - El Centro Market	Building	Historic	HP06	2000 (G. Duncan, South Pasadena Cultural Heritage Commission)	LA-10185
P-19-188513		OHP Property Number - 147063; Resource Name - S Pasadena Water Tower; Other - Sprint CA-LOS0099A; Other - Bilicke Water Tank	Structure	Historic	HP11	2009 (K.A. Crawford, Michael Brandman Associates)	LA-10388, LA-12060
P-19-189325		OHP Property Number - 177126; Resource Name - Arroyo Seco Park; Other - Art in the Park	District	Historic	HP35	2000 (Christy Johnson, Historic Resources Group)	LA-06385, LA-12059, LA-12714
P-19-190613		Resource Name - Arroyo Seco Golf Course	Building	Historic	HP39	2013 (Casey Tibbet, LSA Associates, Inc)	LA-12422, LA-12714
P-19-190632		Resource Name - Medical Offices; Other - T-Mobile West LLC IE04948A/LA948 Sinclair	Building	Historic	HP07	2013 (K.A. Crawford, Michael Brandman Associates)	LA-12423
P-19-190788		Resource Name - 1000 Block Fair Oaks District; OHP Property Number - 150988	District	Historic	HP03; HP06; HP10	2002 (Jan Ostashay, Peter Moruzzi, PCR Services Corporation)	
P-19-190789		Resource Name - 1100 Block Fair Oaks District	District	Historic	HP06	2002 (Jan Ostashay, Peter Moruzzi, PCR Services)	
P-19-191944		Resource Name - Garfield Substation Property	District	Historic	HP09	2015 (Wendy L. Tinsley Becker, Urbana Preservation & Planning)	

APPENDIX C-2

NATIVE AMERICAN CONSULTATION RECORDS

CITY OF SOUTH PASADENA
PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Andrew Salas, Chairperson
Gabrieleno Band of Mission Indians, Kizh Nation
P.O. BOX 393
Covina, CA 91723

Dear Mr. Salas,

The City of South Pasadena (City) is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the South Pasadena General Plan and Downtown Specific Plan (DTSP) Update and 2021–2029 Housing Element ("Project"). The Project site consists of the entire City of South Pasadena. The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity. The City last comprehensively updated their General Plan in 1998, and the Mission Street Specific Plan (now referred to as the DTSP) was adopted in 1996. The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Additionally, the General Plan's 2021–2029 Housing Element is also being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units.

As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of South Pasadena.

AB 52 requires lead agencies to consult with California Native American tribes that request such consultation in writing prior to the agency's release of a Notice of Preparation (NOP) of an Environmental Impact Report (EIR), or notice of a Mitigated Negative Declaration (MND), or Negative Declaration (ND). To that end, the City of South Pasadena is notifying you of this Project. AB 52 allows tribes 30 days after receiving notification to request consultation.

Because this Project is a General Plan Update, it is subject to the statutory requirements of Senate Bill 18 Tribal Consultation Guidelines (Section 65352.3 of the *Government Code*). Under the law, tribes identified by the Native American Heritage Commission (NAHC) are provided 90 days from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of South Pasadena, pursuant to SB 18.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources in and around the City and wish to consult with the City of South Pasadena regarding these resources, please direct your email to mlin@southpasadenaca.gov or any correspondence on this matter to:

Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

The City of South Pasadena would welcome a response at your earliest possible convenience, but no later than 30 days after receiving this letter. Should we not receive a response within 30 days, we will presume that you've declined consultation under AB 52; however, under SB 18 you have 90 days to respond. Please do not hesitate to let me know if you have any questions or would like to discuss this Project. I can be reached by email at the address above or by phone at (626) 403 -7221.

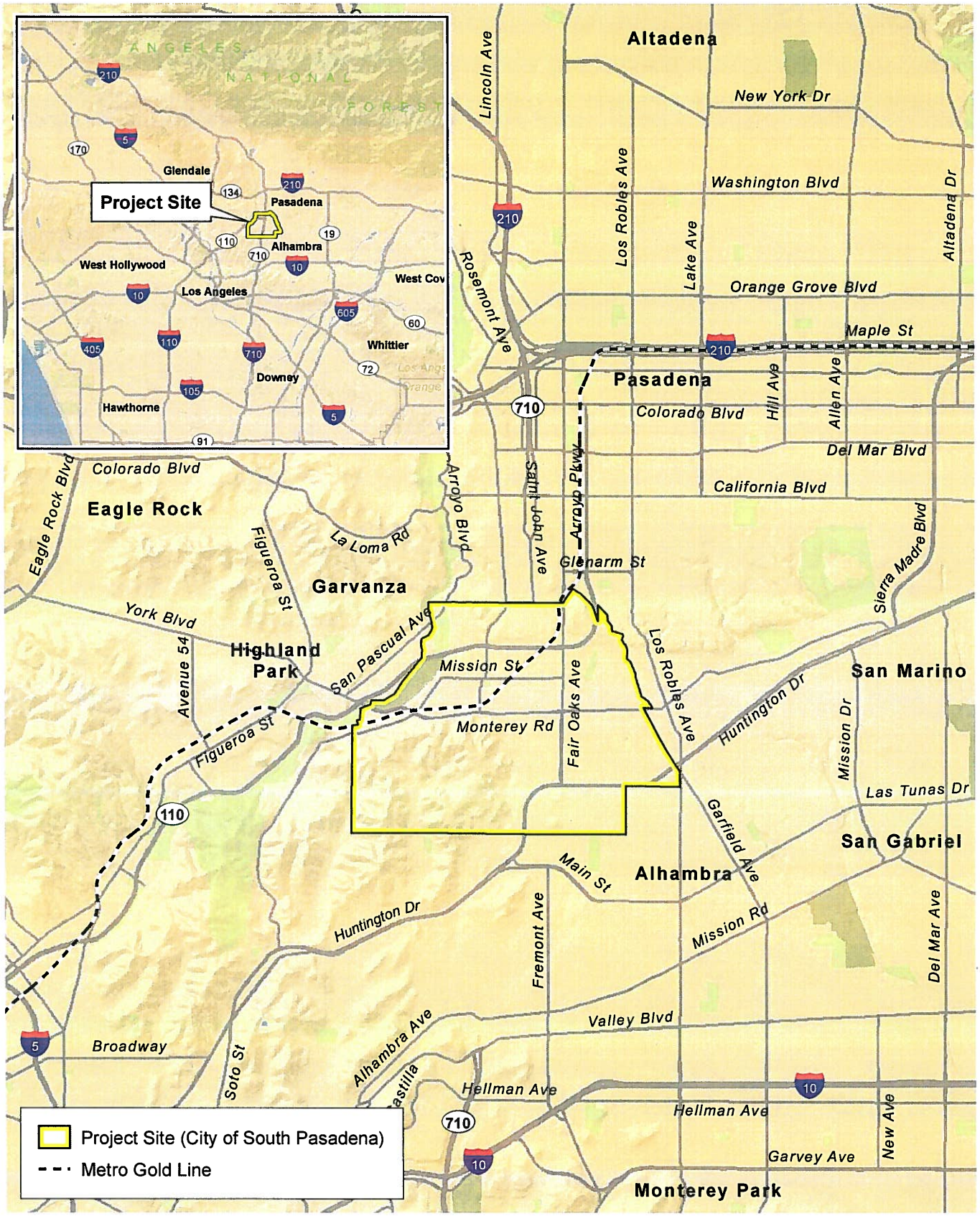
Thank you very much for your assistance.

Sincerely,

Margaret Lin

Margaret Lin
Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity



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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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CITY OF SOUTH PASADENA
PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Anthony Morales, Chairperson
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. BOX 693
Covina, CA 91778

Dear Mr. Morales,

The City of South Pasadena (City) is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the South Pasadena General Plan and Downtown Specific Plan (DTSP) Update and 2021–2029 Housing Element ("Project"). The Project site consists of the entire City of South Pasadena. The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity. The City last comprehensively updated their General Plan in 1998, and the Mission Street Specific Plan (now referred to as the DTSP) was adopted in 1996. The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Additionally, the General Plan's 2021–2029 Housing Element is also being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units.

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Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

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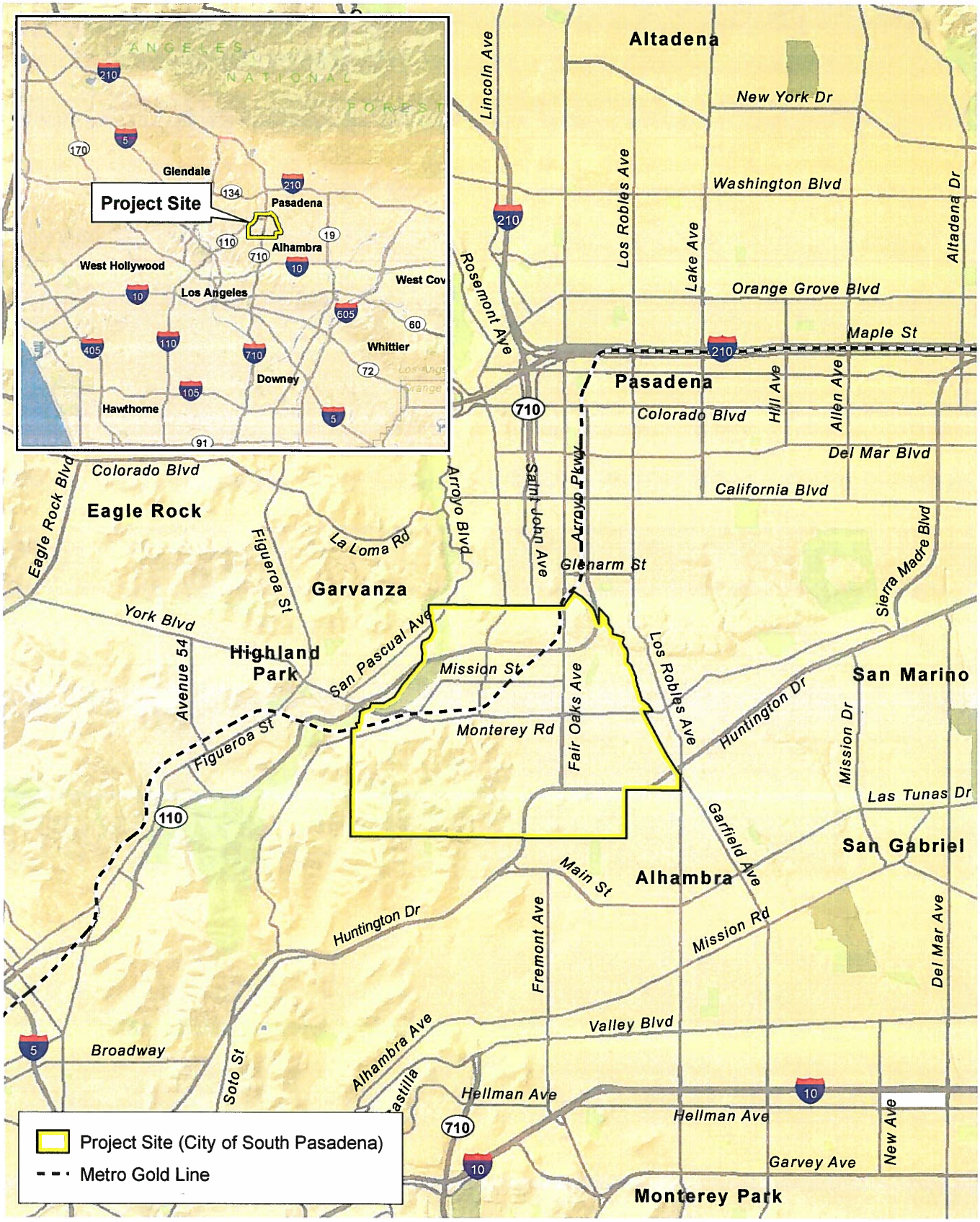

Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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CITY OF SOUTH PASADENA
PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Sandonne Goad, Chairperson
Gabrieleno/Tongva
106 ½ Judge John Aiso Street, #231
Los Angeles, CA 90012

Dear Mr. Goad,

The City of South Pasadena (City) is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the South Pasadena General Plan and Downtown Specific Plan (DTSP) Update and 2021–2029 Housing Element ("Project"). The Project site consists of the entire City of South Pasadena. The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity. The City last comprehensively updated their General Plan in 1998, and the Mission Street Specific Plan (now referred to as the DTSP) was adopted in 1996. The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Additionally, the General Plan's 2021–2029 Housing Element is also being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units.

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1414 Mission Street
South Pasadena, CA 91030

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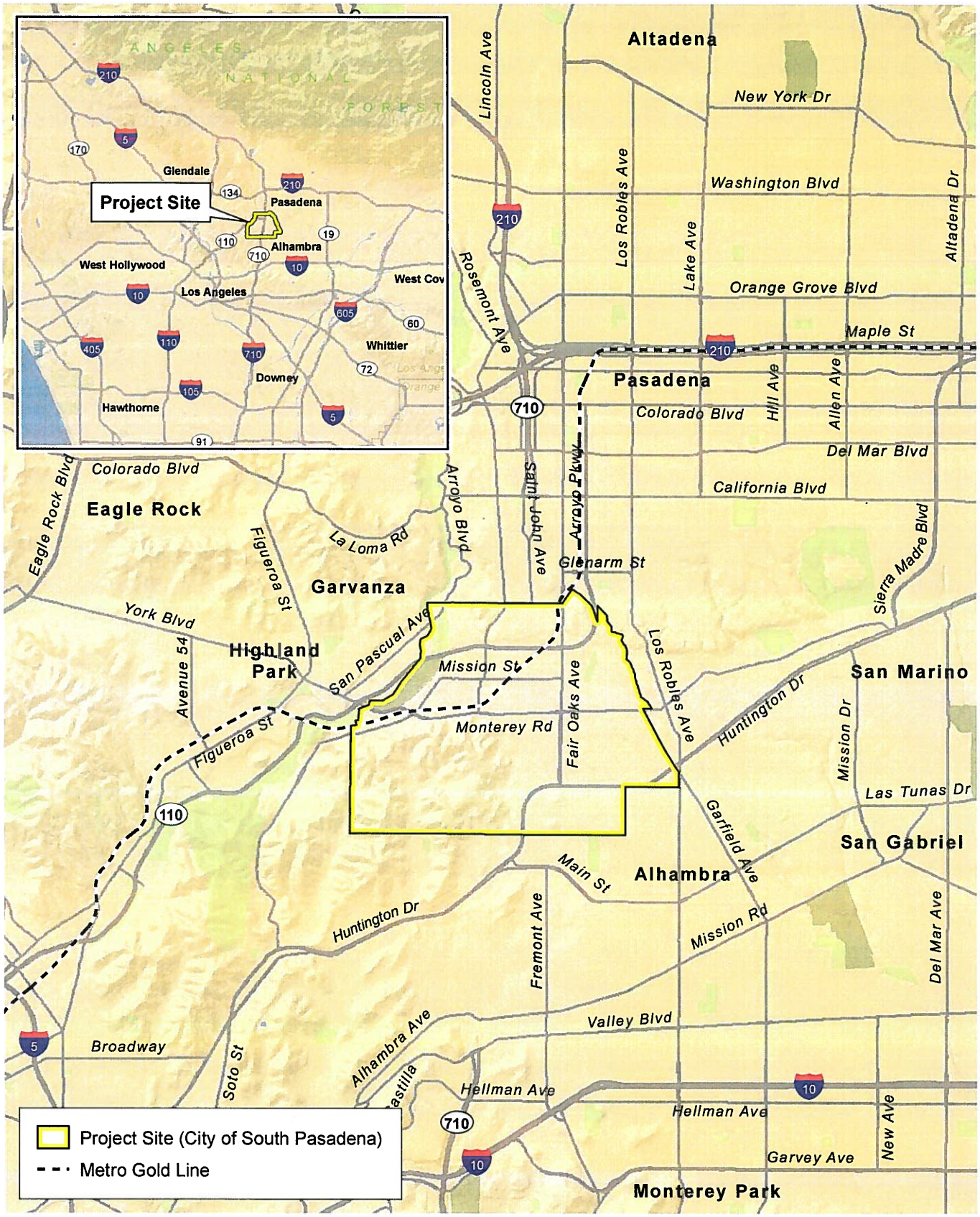

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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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WWW.SOUTHPASADENACA.GOV

04/21/21

Robert Dorame, Chairperson
Gabrieleno Tongva Indians of California Tribal Council
P.O. BOX 490
Bellflower, CA 90707

Dear Mr. Dorame,

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Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

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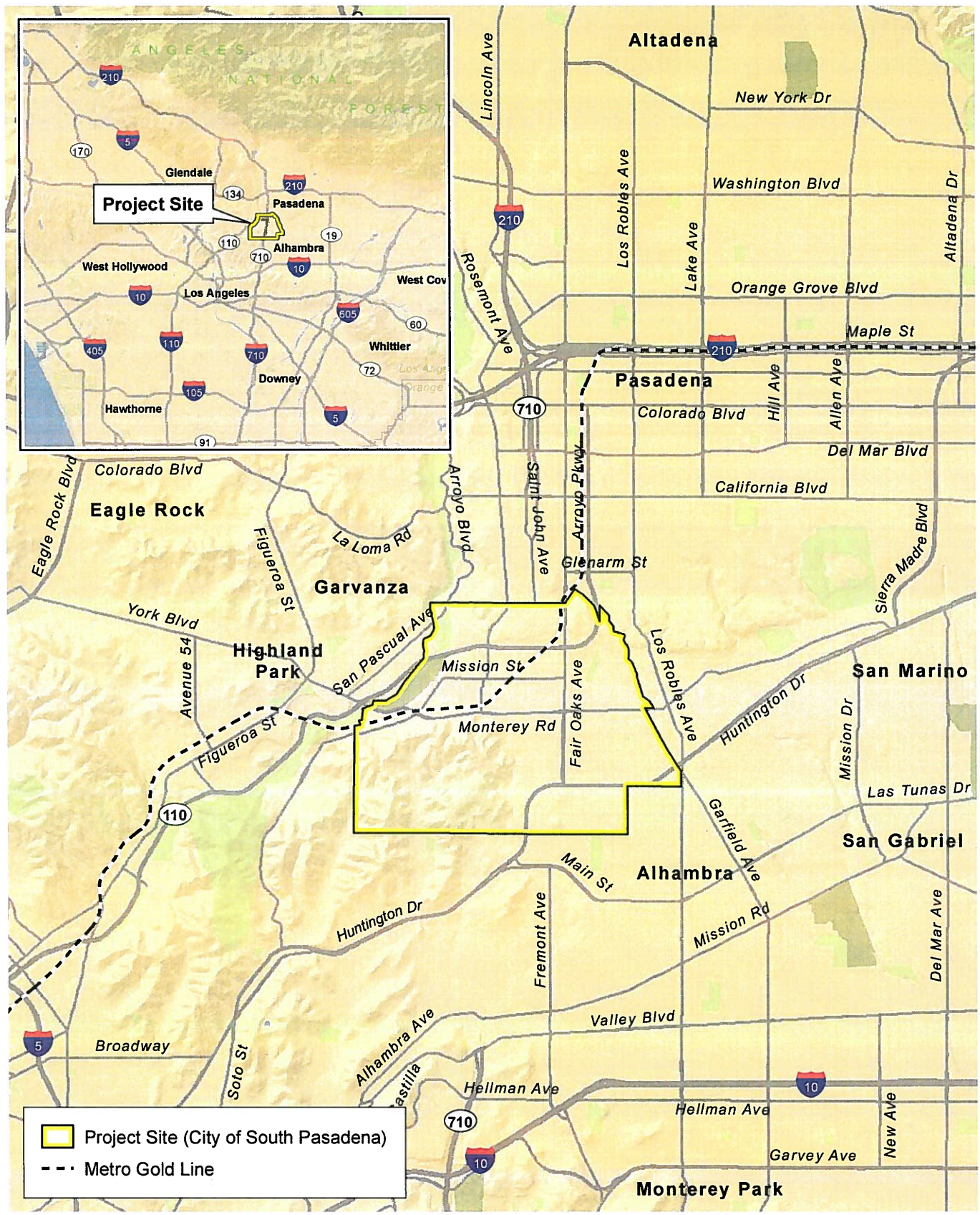

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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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CITY OF SOUTH PASADENA
PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Charles Alvarez
Gabrieleno-Tongva Tribe
23454 Vanowen Street
West Hills, CA 91307

Dear Mr. Alvarez,

The City of South Pasadena (City) is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the South Pasadena General Plan and Downtown Specific Plan (DTSP) Update and 2021–2029 Housing Element ("Project"). The Project site consists of the entire City of South Pasadena. The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity. The City last comprehensively updated their General Plan in 1998, and the Mission Street Specific Plan (now referred to as the DTSP) was adopted in 1996. The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Additionally, the General Plan's 2021–2029 Housing Element is also being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units.

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Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

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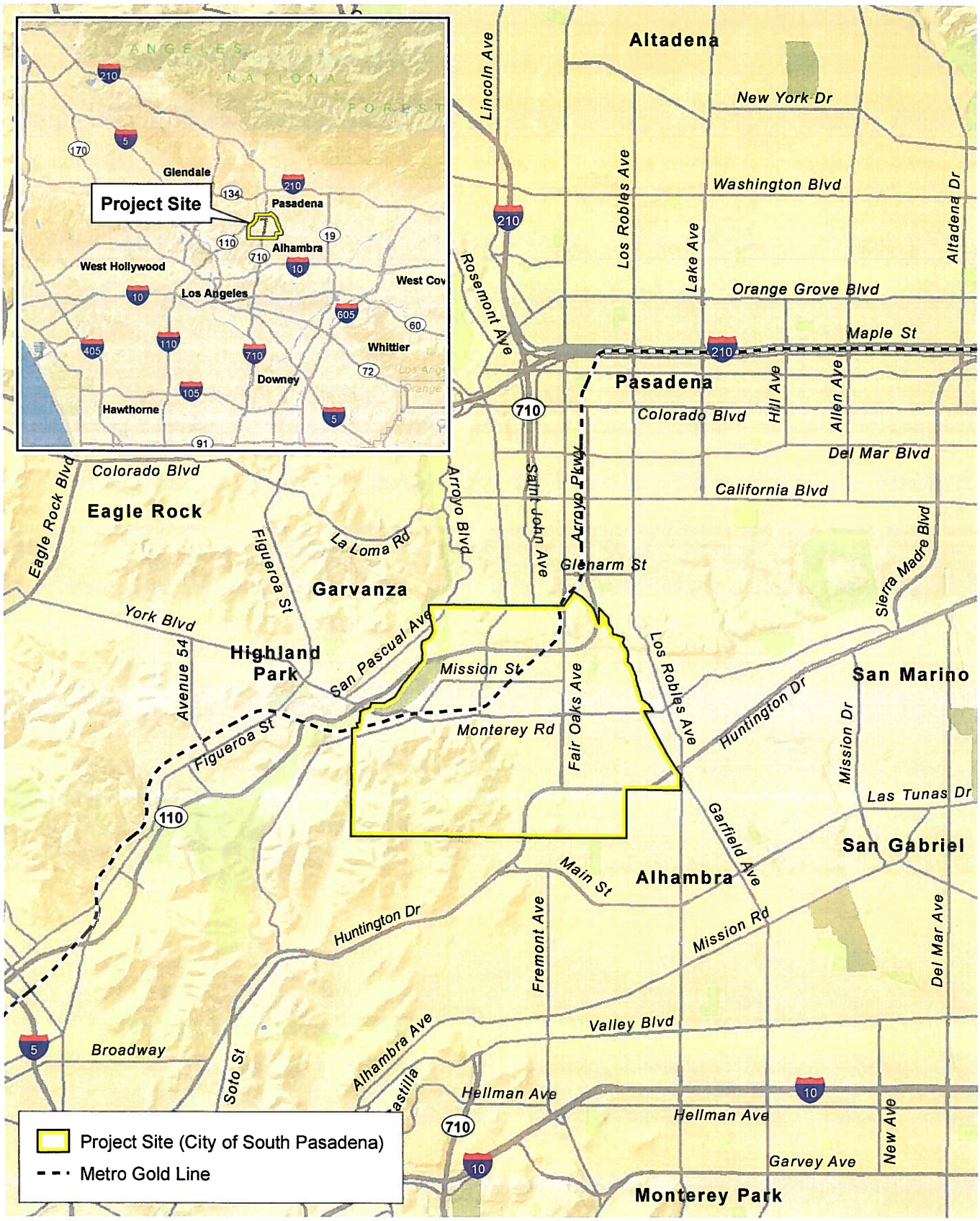
Sincerely,

Margaret Lin

Margaret Lin
Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity



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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

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PSOMAS

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CITY OF SOUTH PASADENA
PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
1414 MISSION STREET, SOUTH PASADENA, CA 91030
TEL: 626.403.7220 ▪ FAX: 626.403.7221
WWW.SOUTHPASADENACA.GOV

04/21/21

Scott Cozart, Chairperson
Soboba Band of Luiseno Indians
P.O. BOX 487
San Jacinto, CA 92583

Dear Mr. Cozart,

The City of South Pasadena (City) is the lead agency, pursuant to the California Environmental Quality Act (CEQA), for the South Pasadena General Plan and Downtown Specific Plan (DTSP) Update and 2021–2029 Housing Element ("Project"). The Project site consists of the entire City of South Pasadena. The City is located on the western edge of the San Gabriel Valley area of Los Angeles County, approximately five miles northeast of downtown Los Angeles. The City's location and regional setting and primary transportation corridors are shown on Exhibit 1, Regional and Local Vicinity. The City last comprehensively updated their General Plan in 1998, and the Mission Street Specific Plan (now referred to as the DTSP) was adopted in 1996. The General Plan Update serves as a long-term policy guide for decision-making regarding the appropriate physical development, resource conservation, and character of the City and establishes an overall development capacity for the City for the 2040 horizon year. The DTSP Update is a companion document to the General Plan Update, with the intention of building on the success of the earlier plan (1996) and expanding the area included in the DTSP to include Fair Oaks Avenue. Additionally, the General Plan's 2021–2029 Housing Element is also being analyzed in the PEIR. For the proposed 2021–2029 Housing Element, SCAG has determined that the City's RHNA allocation is 2,067 units.

As further discussed below, this letter is intended as formal notification of the proposed Project pursuant to Assembly Bill (AB) 52, and an invitation to undertake formal government-to-government consultation pursuant to Senate Bill (SB) 18 with the City of South Pasadena.

AB 52 requires lead agencies to consult with California Native American tribes that request such consultation in writing prior to the agency's release of a Notice of Preparation (NOP) of an Environmental Impact Report (EIR), or notice of a Mitigated Negative Declaration (MND), or Negative Declaration (ND). To that end, the City of South Pasadena is notifying you of this Project. AB 52 allows tribes 30 days after receiving notification to request consultation.

Because this Project is a General Plan Update, it is subject to the statutory requirements of Senate Bill 18 Tribal Consultation Guidelines (Section 65352.3 of the *Government Code*). Under the law, tribes identified by the Native American Heritage Commission (NAHC) are provided 90 days from receiving notification to request government-to-government consultation with the City. A shorter timeframe can also be agreed to by the tribe. This letter is to inform you of the existence of the proposed Project and extend an offer of consultation between you and the City of South Pasadena, pursuant to SB 18.

Your participation in this local planning process is important. If you possess any information or knowledge regarding Native American Sacred Lands or other tribal cultural resources in and around the City and wish to consult with the City of South Pasadena regarding these resources, please direct your email to mlin@southpasadenaca.gov or any correspondence on this matter to:

Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030

The City of South Pasadena would welcome a response at your earliest possible convenience, but no later than 30 days after receiving this letter. Should we not receive a response within 30 days, we will presume that you've declined consultation under AB 52; however, under SB 18 you have 90 days to respond. Please do not hesitate to let me know if you have any questions or would like to discuss this Project. I can be reached by email at the address above or by phone at (626) 403 -7221.

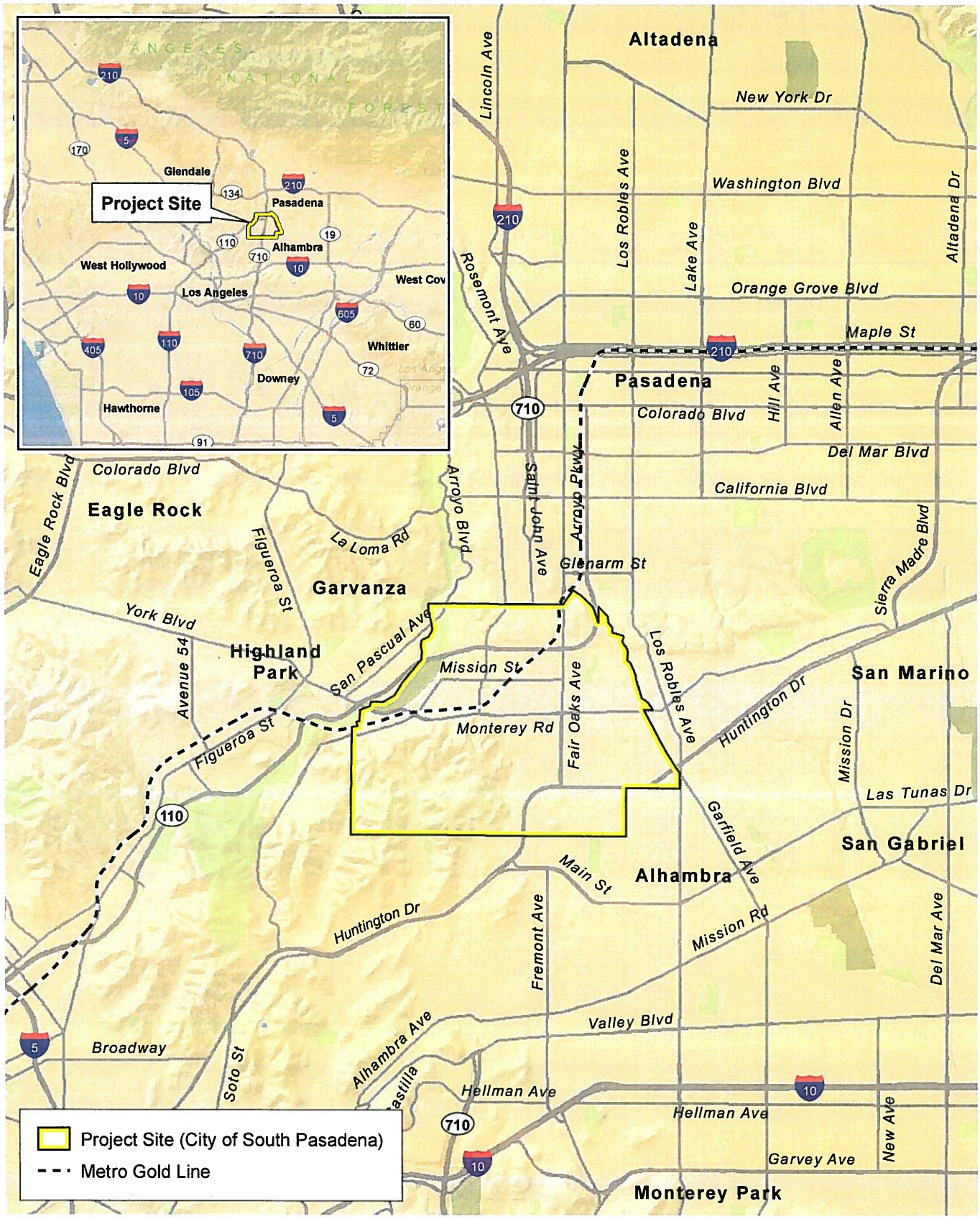
Thank you very much for your assistance.

Sincerely,

Margaret Lin

Margaret Lin
Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity



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Regional and Local Vicinity

Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project

PSOMAS

(Rev 12-18-2017 MMD) R:\Projects\RAN\3RAN010100\Graphics\NOP\ex_LV_RL.pdf

May 29, 2021

Attention: Ms. Margaret Lin
Manager of Long Range Planning and Economic Development
1414 Mission Street
South Pasadena, CA 91030
mlin@southpasadenaca.gov

Sam Dunlap
Cultural Resource Director
Gabrielino Tongva Tribe

Subject: Assembly Bill 52 Tribal Consultation and SB 18– South Pasadena General Plan and Downtown Specific Plan Update and 2021-2029 Housing Element

Dear Miss Lin,

The Gabrielino Tongva Tribe requests formal consultation pursuant to SB 18 and AB 52 on the proposed project. Our tribe's concerns will focus on any potential impact on our tribal's cultural resources. during consultation, we will request direct involvement in formulating adequate mitigation measures that will protect the cultural resources of our tribe. I ask that you please contact me directly at tongvatcr@gmail.com.

Sincerely,

Sam Dunlap
Cultural Resource Director
Gabrielino Tongva Tribe
tongvatcr@gmail.com
(909) 262-9351

APPENDIX D

PALEONTOLOGICAL RECORDS SEARCH

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007
tel 213.763.DINO
www.nhm.org

NATURAL HISTORY MUSEUM
LOS ANGELES COUNTY

Research & Collections

e-mail: paleorecords@nhm.org

May 3, 2021

PSOMAS

Attn: Charles Cisneros

re: Paleontological resources for the Project 3SPA010100

Dear Charles:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the 3SPA010100 project area as outlined on the portion of the Los Angeles USGS topographic quadrangle map that you sent to me via e-mail on April 29, 2021. We have three fossil localities from within the project area:

Locality Number	Location	Formation	Taxa	Depth
LACM IP 2542	838 Lyndon Street; South Pasadena	Topanga Formation	Mantis shrimp (Squillidae)	Surface
LACM IP 23222	on Fair Oaks Ave; north of the intersection of Fair Oaks and the Arroyo Seco Freeway	Unknown formation (Pliocene)	Invertebrates (unspecified)	Surface, along bluff next to sidewalk
LACM IP 24385	South Pasadena; on east side of Fair Oaks Ave just north of intersection of Pasadena Freeway and Fair Oaks Ave	Unknown formation (Pliocene)	Invertebrates (unspecified)	Unknown

The following table shows additional known localities in the collection of the Natural History Museum of Los Angeles County that are near the project area:

Locality Number	Location	Formation	Taxa	Depth
LACM VP CIT424	Near intersection of Burleigh Rd and Avenue 64	Topanga Formation	Herring (*Ganolytes*), perch-like fish (*Thyrsocles*), ray-finned fish (*Etringus*), and other unspecified	Unknown

			fish	
LACM VP CIT342	Sparkletts property near 45th & Lincoln in Highland Park	Unknown formation (Pleistocene)	Mammoth (*Mammuthus*), Bison (*Bison*)	14 ft bgs
LACM VP 6934	Along the slope between Quail Drive & Pheasant Drive; E of Mt Washington Elementary School	Monterey Formation (yellowish tan siltstone)	Baleen whale *(Mysticeti*)	found in hillslope rubble
LACM VP 7507	Near intersection of San Fernando Rd. & Humbolt St.	Monterey Formation	Perch-like fish (*Thyrsocles kriegeri*)	31-32 m bgs (collected during excavations of the Humboldt Street Sewer Shaft)
LACM VP 1023	Workman & Alhambra Sts	Unknown Formation (Pleistocene)	Sabertooth cat (*Smilodon*), horse (*Equus*), deer (*Odocoileus*), Turkey (*Meleagris*)	Unknown (excavations for storn drains)
LACM VP 2032	Los Angeles Brickyard Mission Rd. & Daly St.	Unknown Formation (Pleistocene, silt & clay)	Mastodon (*Mammut*)	20-35 ft bgs

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the Natural History Museum of Los Angeles County ("NHMLA"). It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Sincerely,

Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

enclosure: invoice

APPENDIX E-1

TRAFFIC NOISE MODELING DATA

South Pasadena General Plan Update Traffic Noise Analysis

Roadway Segment		Speed	24-hour Traffic Volume			Vehicle Fleet Mix			Distance to CNEL from Roadway Centerline								Noise Level (CNEL or Ldn) at Distance from Roadway Centerline					
									Existing				Future No Project				Future With Project				Change	Change
ID	ROAD_NAME		Existing	Future Without Project	Future With Project	Existing Autos	Medium Tru	Heavy Truck	50.0 Feet	60 CNEL	65 CNEL	70 CNEL	50.0 Feet	60 CNEL	65 CNEL	70 CNEL	50.0 Feet	60 CNEL	65 CNEL	70 CNEL	From Existing	due to Project
13876	PASADENA FWY	50	55,303	56,839	57,264	93%	2%	5%	79.3	963	447	207	79.4	981	455	211	79.4	985	457	212	0.2	0.0
14030	PASADENA FWY	54	52,223	54,064	54,728	93%	2%	5%	79.8	1041	483	224	79.9	1065	494	229	80.0	1074	498	231	0.2	0.1
14036	PASADENA FWY	41	53,116	54,419	54,694	93%	2%	5%	77.5	737	342	159	77.6	749	348	161	77.7	752	349	162	0.1	0.0
14316	PASADENA FWY	55	49,554	51,204	51,747	93%	2%	5%	79.8	1044	485	225	79.9	1067	495	230	80.0	1074	499	231	0.2	0.0
14381	PASADENA FWY	52	64,601	65,570	66,019	93%	2%	5%	80.4	1146	532	247	80.5	1157	537	249	80.5	1162	540	250	0.1	0.0
14596	PASADENA FWY	50	65,824	66,366	67,016	93%	2%	5%	80.1	1101	511	237	80.2	1107	514	238	80.2	1114	517	240	0.1	0.0
88512	PASADENA FWY	48	43,975	45,719	46,174	93%	2%	5%	78.0	793	368	171	78.2	814	378	175	78.2	820	380	177	0.2	0.0
92026	Ramp-Other	13	5,492	5,613	5,665	93%	2%	5%	62.2	70	32	15	62.3	71	33	15	62.3	71	33	15	0.1	0.0
92053	Ramp-Other	29	12,153	11,527	11,660	93%	2%	5%	69.7	223	103	48	69.5	215	100	46	69.6	217	101	47	-0.2	0.0
92104	Ramp-Other	30	2,187	2,420	2,570	93%	2%	5%	62.4	72	34	16	62.8	77	36	17	63.1	80	37	17	0.7	0.3
92181	Ramp-Other	28	16,269	15,162	15,269	93%	2%	5%	70.7	259	120	56	70.4	247	115	53	70.4	249	115	54	-0.3	0.0
92269	Ramp-Other	30	0	5	13	93%	2%	5%	-2.7	0	0	0	36.3	1	1	0	40.3	2	1	1	43.0	4.1
95509	Ramp-Other	15	2,669	2,861	2,982	93%	2%	5%	59.5	46	21	10	59.8	48	22	10	60.0	50	23	11	0.5	0.2
95511	Ramp-Other	10	11,485	11,151	11,324	93%	2%	5%	64.3	97	45	21	64.2	95	44	20	64.2	96	45	21	-0.1	0.1
97322	FAIR OAKS AVE	8	54,338	53,553	53,776	96%	1%	3%	67.7	163	75	35	67.6	161	75	35	67.6	161	75	35	0.0	0.0
97323	FAIR OAKS AVE	18	46,447	43,645	43,992	96%	1%	3%	71.3	284	132	61	71.0	272	126	59	71.1	274	127	59	-0.2	0.0
97324	FAIR OAKS AVE	13	48,846	47,940	48,111	96%	1%	3%	69.9	227	105	49	69.8	224	104	48	69.8	225	104	48	-0.1	0.0
97526	BRIDEWELL ST	28	0	5	13	100%	0%	0%	3.2	0	0	0	29.5	0	0	0	33.6	1	0	0	30.3	4.1
97601	MARMION WAY	29	3,612	4,055	4,384	99%	0%	0%	59.6	47	22	10	60.1	51	24	11	60.4	53	25	11	0.8	0.3
108176	MONTEREY RD	33	5,467	6,258	6,692	97%	1%	1%	63.8	89	41	19	64.4	98	45	21	64.7	102	47	22	0.9	0.3
108352	YORK BLVD	24	39,002	42,709	43,244	98%	1%	1%	69.2	205	95	44	69.6	218	101	47	69.6	220	102	47	0.4	0.1
108474	MONTEREY RD	35	7,430	8,227	8,538	98%	1%	1%	65.4	114	53	25	65.8	122	57	26	66.0	125	58	27	0.6	0.2
108484	PASADENA AVE	23	40,776	44,781	45,000	98%	1%	1%	69.2	205	95	44	69.6	218	101	47	69.6	219	102	47	0.4	0.0
108592	PASADENA AVE	29	35,247	39,030	38,887	99%	1%	1%	70.1	236	110	51	70.6	253	117	54	70.5	252	117	54	0.4	0.0
108667	PASADENA AVE	29	6,458	7,542	8,410	97%	1%	2%	64.4	98	45	21	65.0	108	50	23	65.5	116	54	25	1.1	0.5
108668	MONTEREY RD	18	38,284	41,557	42,150	99%	1%	1%	66.1	128	59	28	66.5	135	63	29	66.5	136	63	29	0.4	0.1
108752	MISSION ST	29	10,585	12,320	12,581	96%	2%	2%	66.9	143	66	31	67.5	158	74	34	67.6	161	75	35	0.8	0.1
108938	ORANGE GROVE AVE	17	17,011	17,974	18,762	98%	1%	1%	63.3	84	39	18	63.6	87	40	19	63.8	89	41	19	0.4	0.2
108941	ORANGE GROVE AVE	24	26,917	26,429	26,945	99%	0%	1%	66.9	143	66	31	66.8	141	66	30	66.9	143	66	31	0.0	0.1
108943	ORANGE GROVE AVE	22	32,984	31,957	32,083	99%	0%	1%	66.6	137	64	30	66.4	134	62	29	66.5	135	63	29	-0.1	0.0
109115	HUNTINGTON DR	29	25,712	27,384	28,802	96%	1%	3%	71.3	284	132	61	71.6	297	138	64	71.8	307	142	66	0.5	0.2
109190	FREMONT AVE	22	19,685	21,609	21,933	98%	1%	1%	66.2	129	60	28	66.6	138	64	30	66.7	139	64	30	0.5	0.1
109191	FREMONT AVE	18	23,215	24,331	24,660	98%	0%	1%	65.1	110	51	24	65.3	113	53	24	65.4	114	53	25	0.3	0.1
109192	MONTEREY RD	27	30,132	33,867	34,688	99%	1%	1%	68.5	185	86	40	69.0	200	93	43	69.1	203	94	44	0.6	0.1
109195	FREMONT AVE	22	19,773	21,601	21,738	98%	1%	1%	66.1	128	59	28	66.5	136	63	29	66.5	136	63	29	0.4	0.0
109196	MISSION ST	30	9,686	10,663	11,049	98%	1%	1%	65.4	115	54	25	65.9	123	57	26	66.0	126	58	27	0.6	0.2
109203	HUNTINGTON DR	33	22,911	25,324	26,508	96%	1%	3%	71.4	289	134	62	71.9	309	143	67	72.1	319	148	69	0.6	0.2
109204	FREMONT AVE	3	32,184	33,548	35,298	97%	1%	2%	60.0	50	23	11	60.1	51	24	11	60.4	53	25	11	0.4	0.2
109205	FREMONT AVE	18	29,466	30,001	29,904	97%	1%	3%	68.6	186	86	40	68.6	189	88	41	68.6	188	87	41	0.1	0.0
109206	HUNTINGTON DR	23	30,682	31,930	33,989	96%	1%	3%	70.7	256	119	55	70.8	263	122	57	71.1	275	127	59	0.4	0.3
109240	HUNTINGTON DR	33	29,418	31,495	33,948	95%	1%	3%	72.7	351	163	76	73.0	367	170	79	73.3	386	179	83	0.6	0.3
109245	FAIR OAKS AVE	30	17,823	17,501	18,693	95%	1%	4%	70.7	260	121	56	70.7	257	119	55	70.9	268	125	58	0.2	0.3
109246	HUNTINGTON DR	54	12,860	14,430	15,296	97%	1%	2%	72.4	338	157	73	72.9	365	169	79	73.2	379	176	82	0.8	0.3
109253	FAIR OAKS AVE	34	16,614	17,178	18,547	94%	2%	4%	70.8	262	122	56	70.9	268	124	58	71.3	282	131	61	0.5	0.3
109254	FAIR OAKS AVE	36	10,863	10,725	9,841	97%	1%	2%	67.6	161	75	35	67.6	160	74	34	67.2	151	70	33	-0.4	-0.4
109255	HUNTINGTON DR	35	12,804	14,317	15,401	97%	1%	2%	68.4	181	84	39	68.9	195	91	42	69.2	205	95	44	0.8	0.3
109256	FAIR OAKS AVE	36	18,095	17,773	18,965	95%	1%	4%	71.2	281	130	61	71.2	278	129	60	71.4	290	135	62	0.2	0.3
109257	FAIR OAKS AVE	31	10,863	10,725	9,841	97%	1%	2%	66.7	141	65	30	66.7	139	65	30	66.3	132	61	28	-0.4	-0.4
109258	FAIR OAKS AVE	27	26,735	27,494	27,892	96%	1%	3%	71.4	286	133	62	71.5	291	135	63	71.5	294	136	63	0.2	0.1
109259	FAIR OAKS AVE	21	27,450	27,795	28,183	96%	1%	3%	69.8	224	104	48	69.8	226	105	49	69.9	228	106	49	0.1	0.1
109260	MONTEREY RD	30	27,489	30,636	32,283	99%	1%	1%	69.3	210	97	45	69.8	226	105	49	70.0	234	108	50	0.7	0.2
109261	FAIR OAKS AVE	24	21,242	20,781	21,350	95%	1%	3%	69.9	229	106	49	69.8	225	105	49	69.9	229	106	49	0.0	0.1
109276	MONTEREY RD	27	12,498	13,564	14,196	99%	0%	0%	63.5	86	40	19	63.9	91	42	20	64.1	94	43	20	0.6	0.2
109277	E HUNTINGTON DR	34	23,723	25,154	25,136	97%	1%	2%	70.7	258	120	56	70.9	268	124	58	70.9	268	124	58	0.3	0.0
109323	HUNTINGTON DR	37	13,077	14,590	15,673	97%	1%	2%	68.9	197	91	42	69.4	212	98	46	69.7	222	103	48	0.8	0.3
109324	FAIR OAKS AVE	34	8,640	9,721	8,928	97%	1%	2%	66.4	134	62	29	66.9	145	67	31	66.6	137	64	29	0.1	-0.4
124760	ARROYO DR	29	5,562	5,794	6,152	97%	2%	2%	63.8	90	42	19	64.0	92	43	20	64.3	96	45	21	0.4	0.3
126106	PASADENA FWY	57	40,071	42,538	43,069	93%	2%	5%	79.1	942	437	203	79.4	980	455	211	79.4	988	459	213	0.3	0.1
129934	E HUNTINGTON DR	35	19,900	22,713	23,077	97%	1%	2%	70.2	238	111	51	70.7	260	121	56	70.8	263	122	57	0.6	0.1
130014	FAIR OAKS AVE	16	42,385	41,148	42,452	95%	1%	3%	70.5	252	117	54	70.4	247	115	53	70.5	252	117	54	0.0	0.1
130015	FAIR OAKS AVE	18	21,143	20,367	21,103	96%	1%	3%	68.1	173	80	37	67.9	168	78	36	68.1	172	80	37	0.0	0.2
145680	MISSION ST	22	16,544	17,180	17,061	99%	0%	0%	63.3	83	38	18	63.5	85	39	18	63.4	85	39	18	0.1	0.0
145694	MONTEREY RD	23	10,865	12,392	12,570	100%	0%	0%	61.3	61	28	13	61.9	66	31	14	61.9	67	31	14	0.6	0.1

145696	MISSION ST	19	15,276	16,586	16,613	99%	0%	0%	60.7	56	26	12	61.1	59	27	13	61.1	59	27	13	0.4	0.0
145697	GARFIELD AVE	20	16,401	17,315	17,523	99%	0%	0%	61.6	63	29	14	61.8	66	31	14	61.8	66	31	14	0.3	0.1
1643138	FAIR OAKS AVE	25	39,623	37,239	37,341	95%	1%	4%	73.1	372	173	80	72.8	357	166	77	72.8	358	166	77	-0.3	0.0
1643140	W STATE ST	25	3,284	5,081	5,245	100%	0%	0%	55.7	26	12	6	57.6	35	16	7	57.8	36	17	8	2.0	0.1
2663575	PASADENA FWY	45	49,810	51,226	51,599	93%	2%	5%	78.0	789	366	170	78.1	804	373	173	78.1	808	375	174	0.2	0.0
2665469	MISSION ST	27	15,116	19,440	20,062	98%	1%	1%	66.9	145	67	31	68.0	171	80	37	68.2	175	81	38	1.2	0.1
2665470	MISSION ST	30	4,864	7,495	7,723	98%	1%	1%	62.1	69	32	15	63.9	92	43	20	64.1	93	43	20	2.0	0.1
2665471	MISSION ST	25	10,234	11,926	12,320	98%	1%	2%	64.7	103	48	22	65.4	114	53	25	65.5	117	54	25	0.8	0.1
2673636	HUNTINGTON DR	32	22,890	25,302	26,432	96%	1%	3%	71.4	288	134	62	71.8	308	143	66	72.0	317	147	68	0.6	0.2
2673637	HUNTINGTON DR	29	25,777	27,529	28,954	96%	1%	3%	71.4	287	133	62	71.7	300	139	65	71.9	310	144	67	0.5	0.2
2673638	RAMONA AVE	27	65	145	151	99%	0%	0%	40.7	3	1	1	44.3	4	2	1	44.5	5	2	1	3.7	0.2
2673639	RAMONA AVE	30	82	163	115	99%	0%	0%	42.7	4	2	1	45.7	6	3	1	44.2	4	2	1	1.5	-1.5
2673642	PINE ST	30	82	163	115	99%	0%	0%	42.7	4	2	1	45.7	6	3	1	44.2	4	2	1	1.5	-1.5
2673645	MERIDIAN AVE	22	12,294	13,608	13,726	98%	1%	1%	64.0	93	43	20	64.5	99	46	21	64.5	100	46	21	0.5	0.0
2673647	MERIDIAN AVE	21	12,294	13,608	13,726	98%	1%	1%	63.9	91	42	20	64.3	97	45	21	64.4	98	45	21	0.5	0.0
2673649	MERIDIAN AVE	22	12,294	13,608	13,726	98%	1%	1%	64.2	95	44	20	64.6	102	47	22	64.7	102	47	22	0.5	0.0
2673650	MERIDIAN AVE	20	10,379	12,289	12,840	97%	1%	2%	63.6	87	40	19	64.3	97	45	21	64.5	100	47	22	0.9	0.2
2673651	MERIDIAN AVE	24	10,234	11,926	12,320	98%	1%	2%	64.5	100	47	22	65.2	111	52	24	65.3	114	53	24	0.8	0.1
2673653	MONTEREY RD	33	7,430	8,227	8,538	98%	1%	1%	65.2	111	51	24	65.6	118	55	26	65.8	121	56	26	0.6	0.2
2673654	BRUNSWICK AVE	28	4,902	6,569	6,694	98%	1%	1%	61.9	67	31	14	63.1	81	38	17	63.2	82	38	18	1.4	0.1
2673655	HILL DR	29	4,865	6,532	6,656	98%	1%	1%	62.2	70	32	15	63.5	85	40	18	63.5	86	40	19	1.4	0.1
2673656	HILL DR	26	4,865	6,532	6,656	98%	1%	1%	61.2	60	28	13	62.5	73	34	16	62.6	74	34	16	1.4	0.1
2673657	CAMINO DEL SOL	30	1,727	2,599	2,742	98%	1%	1%	57.4	33	16	7	59.2	44	20	9	59.4	46	21	10	2.0	0.2
2673658	CAMINO DEL SOL	32	1,727	2,599	2,742	98%	1%	1%	57.9	36	17	8	59.7	48	22	10	59.9	49	23	11	2.0	0.2
2673659	VIA DEL REY	30	1,727	2,599	2,742	98%	1%	1%	57.5	34	16	7	59.2	45	21	10	59.5	46	21	10	2.0	0.2
2673660	VIA DEL REY	27	2,661	3,551	3,807	95%	2%	4%	61.7	65	30	14	63.0	79	37	17	63.3	83	38	18	1.6	0.3
2673661	VIA DEL REY	27	2,661	3,551	3,807	95%	2%	4%	61.7	65	30	14	63.0	79	37	17	63.3	83	38	18	1.6	0.3
2673662	MONTEREY RD	29	35,623	38,017	38,366	99%	0%	1%	69.7	222	103	48	70.0	232	108	50	70.0	233	108	50	0.3	0.0
2673663	VIA DEL REY	28	2,661	3,551	3,807	95%	2%	4%	62.0	68	31	15	63.2	82	38	18	63.5	86	40	19	1.6	0.3
2673665	EL CENTRO ST	28	145	507	716	77%	8%	15%	54.7	22	10	5	60.2	51	24	11	61.7	65	30	14	6.9	1.5
2673666	FREMONT AVE	22	19,684	21,465	21,738	98%	1%	1%	66.2	130	60	28	66.6	138	64	30	66.7	139	65	30	0.4	0.1
2673667	EL CENTRO ST	28	0	144	196	91%	1%	8%	27.1	0	0	0	51.9	15	7	3	53.3	18	8	4	26.2	1.3
2673668	FAIR OAKS AVE	21	42,385	41,148	42,451	95%	1%	3%	72.0	314	146	68	71.8	308	143	66	72.0	314	146	68	0.0	0.1
2673671	MISSION ST	20	15,215	16,525	16,551	99%	0%	0%	61.6	64	30	14	62.0	68	31	15	62.0	68	31	15	0.4	0.0
2673673	MISSION ST	18	15,693	17,255	17,538	99%	0%	1%	61.4	62	29	13	61.8	66	31	14	61.9	67	31	14	0.5	0.1
2673674	PARK AVE	25	416	669	926	90%	2%	8%	55.7	26	12	6	57.8	36	17	8	59.2	44	21	10	3.5	1.4
2673675	HOPE ST	24	416	669	926	90%	2%	8%	55.5	25	12	5	57.5	34	16	7	58.9	42	20	9	3.5	1.4
2673676	PARK AVE	25	416	669	926	90%	2%	8%	55.8	26	12	6	57.9	36	17	8	59.3	45	21	10	3.5	1.4
2673677	GREVELIA ST	18	19,402	20,540	20,291	100%	0%	0%	61.1	59	27	13	61.3	61	28	13	61.3	61	28	13	0.2	-0.1
2673678	CLARK PL	21	19,346	20,484	20,235	100%	0%	0%	62.5	73	34	16	62.7	76	35	16	62.7	75	35	16	0.2	-0.1
2673679	GARFIELD AVE	19	19,346	20,484	20,235	100%	0%	0%	61.2	60	28	13	61.4	62	29	13	61.4	62	29	13	0.2	-0.1
2673680	RAYMONDALE DR	70	28	28	28	100%	0%	0%	48.2	8	4	2	48.2	8	4	2	48.2	8	4	2	0.0	0.0
2673683	RAYMONDALE DR	74	28	28	28	100%	0%	0%	48.8	9	4	2	48.8	9	4	2	48.8	9	4	2	0.0	0.0
2673684	W STATE ST	25	3,256	5,053	5,217	100%	0%	0%	56.0	27	13	6	57.9	36	17	8	58.1	37	17	8	2.0	0.1
2673685	FAIR OAKS AVE	27	34,671	32,517	32,997	94%	2%	4%	73.3	383	178	83	73.0	367	171	79	73.1	371	172	80	-0.2	0.1
2673686	COLUMBIA ST	27	5,809	5,691	5,287	98%	1%	1%	62.3	71	33	15	62.2	70	33	15	61.9	67	31	14	-0.4	-0.3
2673687	FREMONT AVE	9	25,605	27,321	27,053	98%	1%	1%	61.8	65	30	14	62.0	68	32	15	62.0	68	31	15	0.2	0.0
2673688	COLUMBIA ST	26	5,809	5,691	5,287	98%	1%	1%	61.8	66	31	14	61.7	65	30	14	61.4	62	29	13	-0.4	-0.3
2673689	COLUMBIA ST	24	11,420	11,408	11,883	98%	1%	1%	63.9	92	43	20	63.9	92	42	20	64.1	94	44	20	0.2	0.2
2673690	COLUMBIA ST	24	11,420	11,408	11,883	98%	1%	1%	63.9	92	42	20	63.9	91	42	20	64.1	94	44	20	0.2	0.2
2673716	FAIR OAKS AVE	29	27,478	27,902	28,388	96%	1%	3%	71.9	313	145	67	72.0	316	147	68	72.1	320	148	69	0.1	0.1
2673718	OAK ST	27	45	114	358	98%	1%	1%	41.2	3	1	1	45.2	5	2	1	50.2	11	5	2	9.0	5.0
2673719	FAIR OAKS AVE	32	26,735	27,501	28,049	96%	1%	3%	72.3	328	152	71	72.4	334	155	72	72.5	339	157	73	0.2	0.1
2673720	OAK ST	27	20	45	200	95%	2%	4%	40.7	3	1	1	44.2	4	2	1	50.6	12	5	3	9.9	6.4
2673721	OAK ST	38	20	38	43	95%	2%	4%	42.3	3	2	1	45.1	5	2	1	45.5	5	3	1	3.2	0.4
2673722	OAK ST	28	19	180	364	100%	0%	0%	35.3	1	1	0	45.0	5	2	1	48.0	8	4	2	12.8	3.0
2673723	E HUNTINGTON DR	33	19,919	22,732	23,096	97%	1%	2%	70.0	231	107	50	70.5	252	117	54	70.6	255	118	55	0.6	0.1
2673724	FLETCHER AVE	28	19	180	364	100%	0%	0%	35.4	1	1	0	45.1	5	2	1	48.1	8	4	2	12.8	3.0
2675727	MERIDIAN AVE	22	12,294	13,608	13,726	98%	1%	1%	64.3	96	45	21	64.7	103	48	22	64.7	103	48	22	0.5	0.0
2675835	E HUNTINGTON DR	31	20,891	23,465	23,809	97%	1%	2%	69.9	229	106	49	70.4	247	115	53	70.5	250	116	54	0.6	0.1
2691501	COLLIS AVE	20	16,038	18,022	18,360	98%	1%	1%	64.6	102	47	22	65.1	110	51	24	65.2	112	52	24	0.6	0.1
2691507	HILL DR	22	13,205	14,262	14,396	98%	1%	1%	64.1	93	43	20	64.4	98	46	21	64.4	99	46	21	0.4	0.0
2691533	MONTEREY RD	21	38,284	41,557	42,150	99%	1%	1%	67.3	154	72	33	67.7	163	76	35	67.8	165	76	35	0.4	0.1
2691588	PASADENA AVE	29	35,247	39,030	38,887	99%	1%	1%	70.2	240	112	52	70.7	257	119	55	70.7	257	119	55	0.4	0.0
2691593	ARROYO DR	31	5,562	5,794	6,152	97%	2%	2%	64.3	96	45	21	64.4	99	46	21	64.7	103	48	22	0.4	0.3
2691595	ARROYO DR	23	11,008	13,116	13,434	98%	1%	1%	63.2	82	38	18	64.0	92	43	20	64.1	94	44	20	0.9	0.1

2691597	MISSION ST	28	10,982	13,971	14,513	96%	2%	2%	66.9	143	67	31	67.9	168	78	36	68.1	173	80	37	1.2	0.2
2691599	SAN PASQUAL AVE	29	2,187	3,053	3,122	98%	1%	1%	58.1	38	17	8	59.6	47	22	10	59.7	48	22	10	1.5	0.1
2691703	FREMONT AVE	14	29,466	30,001	29,904	97%	1%	3%	67.3	154	71	33	67.4	156	72	34	67.4	155	72	34	0.1	0.0
2691707	FREMONT AVE	21	23,260	24,430	24,703	98%	0%	1%	66.3	132	61	28	66.5	136	63	29	66.6	137	64	30	0.3	0.0
2691709	FREMONT AVE	21	23,260	24,430	24,703	98%	0%	1%	66.1	128	59	28	66.3	132	61	28	66.4	133	62	29	0.3	0.0
2691711	FAIR OAKS AVE	31	27,450	27,795	28,183	96%	1%	3%	72.3	330	153	71	72.4	333	155	72	72.4	336	156	72	0.1	0.1
2691713	E HUNTINGTON DR	32	20,890	23,304	23,464	97%	1%	2%	70.0	234	109	50	70.5	251	117	54	70.6	253	117	54	0.5	0.0
2691757	GARFIELD AVE	19	20,971	21,815	21,821	99%	0%	0%	62.5	74	34	16	62.7	76	35	16	62.7	76	35	16	0.2	0.0
2691773	MONTEREY RD	30	33,670	36,651	37,420	99%	0%	1%	69.8	226	105	49	70.2	240	111	52	70.3	243	113	52	0.5	0.1
2691781	FREMONT AVE	17	19,790	21,623	21,761	98%	0%	1%	64.4	99	46	21	64.8	105	49	23	64.8	105	49	23	0.4	0.0
2691783	FREMONT AVE	17	19,924	21,820	21,960	98%	0%	1%	64.5	100	46	21	64.9	106	49	23	64.9	106	49	23	0.4	0.0
2691785	FAIR OAKS AVE	16	46,780	43,978	44,325	96%	1%	3%	70.5	250	116	54	70.2	240	111	52	70.2	241	112	52	-0.2	0.0
2691787	MONTEREY RD	25	15,496	16,941	16,926	99%	0%	0%	63.8	90	42	19	64.2	96	44	21	64.2	96	44	21	0.4	0.0
2691789	MISSION ST	23	13,596	14,001	14,347	99%	0%	1%	63.3	82	38	18	63.4	84	39	18	63.5	85	40	18	0.2	0.1
2691805	MONTEREY RD	25	15,496	16,941	16,926	99%	0%	0%	63.6	87	40	19	64.0	93	43	20	64.0	92	43	20	0.4	0.0
2753918	MISSION ST	27	16,570	18,910	19,586	98%	1%	1%	67.2	150	70	32	67.7	164	76	35	67.9	168	78	36	0.7	0.2
2757439	FAIR OAKS AVE	10	66,491	65,080	65,435	97%	1%	2%	68.4	183	85	39	68.3	180	84	39	68.4	181	84	39	-0.1	0.0
2757440	GREVELIA ST	16	19,819	21,209	21,217	99%	0%	0%	60.6	55	25	12	60.9	57	27	12	60.9	57	27	12	0.3	0.0
2757452	PASADENA AVE	30	6,350	7,071	7,732	97%	1%	2%	64.0	92	43	20	64.5	99	46	21	64.8	105	49	23	0.9	0.4
2757453	EL CENTRO ST	28	108	470	678	68%	11%	21%	54.5	21	10	5	60.9	57	27	12	62.5	73	34	16	8.0	1.6
2757454	S GRAND AVE	23	450	2,326	2,715	96%	1%	3%	51.9	14	7	3	59.0	43	20	9	59.7	48	22	10	7.8	0.7
2757478	HILL DR	30	3,653	4,529	4,548	98%	1%	1%	61.0	58	27	13	61.9	67	31	15	62.0	68	31	15	1.0	0.0
2757479	HILL DR	30	3,653	4,529	4,548	98%	1%	1%	61.2	60	28	13	62.2	70	32	15	62.2	70	32	15	1.0	0.0
2757492	ALPHA ST	24	4,388	6,149	6,547	96%	1%	3%	62.2	70	33	15	63.7	88	41	19	63.9	92	42	20	1.7	0.3
2757493	CAMINO LINDO	24	4,388	6,149	6,547	96%	1%	3%	62.2	71	33	15	63.7	88	41	19	64.0	92	43	20	1.7	0.3
2757494	FLORES DE ORO	26	4,388	6,149	6,547	96%	1%	3%	62.7	76	35	16	64.2	95	44	20	64.5	99	46	21	1.7	0.3
2757495	E HUNTINGTON DR	29	21,716	24,311	24,600	97%	1%	2%	69.6	218	101	47	70.1	235	109	51	70.1	237	110	51	0.5	0.1
2757496	MARENGO AVE	21	11,695	13,172	13,398	97%	1%	2%	64.4	98	46	21	64.9	106	49	23	65.0	107	50	23	0.6	0.1
2757497	MARENGO AVE	26	2,699	4,894	5,703	94%	1%	4%	61.9	67	31	14	64.5	100	46	22	65.2	111	51	24	3.2	0.7
2757498	MARENGO AVE	23	6,193	8,929	9,127	97%	1%	2%	62.7	75	35	16	64.3	96	45	21	64.3	97	45	21	1.7	0.1
2757499	MARENGO AVE	26	2,697	4,713	5,334	94%	1%	4%	61.9	67	31	14	64.4	98	45	21	64.9	106	49	23	3.0	0.5
2757500	MARENGO AVE	21	7,052	9,055	9,587	96%	1%	3%	63.2	82	38	18	64.3	97	45	21	64.5	100	47	22	1.3	0.2
2757502	MERIDIAN AVE	23	12,212	13,445	13,611	98%	1%	1%	64.5	99	46	21	64.9	106	49	23	65.0	107	50	23	0.5	0.1
2762124	Ramp-Other	10	5,835	5,507	5,426	93%	2%	5%	61.4	62	29	13	61.1	59	27	13	61.0	59	27	13	-0.3	-0.1

Assumptions:

Simplified to 2 lanes 6.1 meters= 20.0
future 6.1 meters= 20.0
Noise path decay parameter for hard site

Calculations using methods of Federal Highway Administration *Highway Traffic Noise Prediction Model*, December, 1978. Baseline California vehicle noise levels from Caltrans, TAN 95-03, 1995

Source of standard assumptions:

24-hour distribution of traffic volumes:
70% day (7-7), 15% evening (7-10), 15% night (10-7)
Analysis of L.A. County 24-hour traffic counts for selected arterial streets conducted by Pat Mann for Inglewood Noise Element, 1974
Truck Mix

ARB standard fleet mix for air quality analysis
Heavy trucks for noise model includes heavy diesel tractor-trailers only
Medium trucks for noise model includes buses and bobtail trucks
Autos includes cars, vans, pickups and light trucks

Site parameter: 0.0

HALFSEP 1/2 lane separation 6.1
HALFSEPFUT 1/2 lane separation (future) 6.1

Lane separation consider moving lanes only

2 ___ ___
+ +

4 ___ ___ ___ ___
+ <--------> +

6 ___ ___ ___ ___ ___ ___
+ <------------> +

8 + ___ ___ ___ ___ ___ ___ ___ ___
+ <----------------> +

California base noise levels:
Autos 5.2+38.8 Log10 (speed, mi/hr) = -2.8 + 38.8 Log10 (speed, km/hr)
Light trucks: 35.3 + 25.6 Log10 (speed, mi/hr) = 30 + 25.6 Log10 (speed, km/hr)
Heavy trucks: 25-31 mi/hr: i/hr) = 47.9 + 19.2 Log10 (speed, km/hr)
35-65 mi/hr: i/hr) = 46.4 + 19.2 Log10 (speed, km/hr)
31-35 mi/hr: ıtion between above two curves

APPENDIX E-2

2018 NOISE STUDY

	DAYTIME			NIGHTTIME		
	AUTOS	M.TRUCKS	H.TRUCKS	AUTOS	M.TRUCKS	H.TRUCKS
INPUT PARAMETERS						
Vehicles per hour	1215	25	25	303	6	6
Speed in MPH	25	25	25	25	25	25
Left angle	-90	-90	-90	-90	-90	-90
Right angle	90	90	90	90	90	90
NOISE CALCULATIONS						
Reference levels	59.4	71.1	77.2	59.4	71.1	77.2
ADJUSTMENTS						
Flow	26.6	9.7	9.7	20.5	3.7	3.7
Distance	-0.1	-0.1	-0.1	-0.1	-0.1	-0.1
Finite Roadway	0	0	0	0	0	0
Barrier	0	0	0	0	0	0
Grade	0	0	0	0	0	0
Constant	-25	-25	-25	-25	-25	-25
LEQ	60.9	55.7	61.9	54.9	49.7	55.8
	DAY LEQ	65.0		NIGHT LEQ	58.9	
						Land use CNEL
		LDN	66.9			Distance to
						Distance to
						Distance to

NAME	Fremont Ave. No Project	s/o Columbia St. W/Project	
ADT	21820	21835	#VALUE!
SPEED	25		
DISTANCE	50		
Land use dist	28		
% A	96		
% MT	2		
% HT	2		
LEFT	-90		
RIGHT	90		
Ldn	66.9		
CNEL	67.4	67.4	
DAY LEQ	65.0		
Day hour			TO TURN ON, COPY L2 TO J2 TO TURN OFF, ENTER ADTS IN J2
Absorptive?	Yes		
Use hour?	no		
GRADE dB		0	

	No Project	W/Project	Increase	Check
	69.9	69.9	0.0	0.00
60	156	156		
65.0	72	72		
70	34	34		

	DAYTIME			NIGHTTIME		
	AUTOS	M.TRUCKS	H.TRUCKS	AUTOS	M.TRUCKS	H.TRUCKS
INPUT PARAMETERS						
Vehicles per hour	2571	54	54	640	13	13
Speed in MPH	40	40	40	40	40	40
Left angle	-90	-90	-90	-90	-90	-90
Right angle	90	90	90	90	90	90
NOISE CALCULATIONS						
Reference levels	67.4	76.3	81.2	67.4	76.3	81.2
ADJUSTMENTS						
Flow	27.8	11.0	11.0	21.7	4.9	4.9
Distance	-0.1	-0.1	-0.1	-0.1	-0.1	-0.1
Finite Roadway	0	0	0	0	0	0
Barrier	0	0	0	0	0	0
Grade	0	0	0	0	0	0
Constant	-25	-25	-25	-25	-25	-25
LEQ	70.0	62.2	67.0	64.0	56.1	61.0
	DAY LEQ	72.2		NIGHT LEQ	66.2	
						Land use CNEL
		LDN	74.2			Distance to
						Distance to
						Distance to

NAME	Huntington Dr.	w/o Garfield Ave.	
	No Project	W/Project	
ADT	46179	45217	#VALUE!
SPEED	40		
DISTANCE	50		
Land use dist	50		
% A	96		
% MT	2		
% HT	2		
LEFT	-90		
RIGHT	90		
Ldn	74.2		
CNEL	74.7	74.6	
DAY LEQ	72.2		
Day hour			TO TURN ON, COPY L2 TO J2 TO TURN OFF, ENTER ADTS IN J2
Absorptive?	Yes		
Use hour?	no		
GRADE dB		0	

	No Project	W/Project	Increase	Check
	74.7	74.6	-0.1	-0.09
60	475	469		
65.0	221	217		
70	102	101		