

# City of South Pasadena 2021–2029 Housing Element Environmental Assessment

Prepared for | City of South Pasadena  
1414 Mission Street  
South Pasadena, CA 91030

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## EXHIBITS

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## APPENDICES

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## EXECUTIVE SUMMARY

### **INTRODUCTION**

The City is the subject of a Court Order<sup>1</sup> to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. 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. As part of this Court Order, pursuant to Government Code Section 65759(a), an agency under such court order the City 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 (State California Environmental Quality Act [CEQA] Guidelines) (Government Code Section 65759(a)(1)). If the local agency determines that the action may have a significant effect on the environment, it shall then prepare, within the time limitations specified, an environmental assessment, 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 Title 14 of the California Code of Regulations (Government Code Section 65759(a)(2)). Should the Initial Study demonstrate that associated actions may have a significant effect on the environment, the City shall prepare an Environmental Assessment (EA) within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the content required for a Draft Environmental Impact Report set forth in Article 9 of the California Code of Regulations. 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 into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]). This EA has been prepared in compliance with Government Code Section 6575965769, et. seq. This EA has been prepared to identify, analyze, and mitigate, to the extent feasible, the potential environmental effects associated with implementation of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). This EA 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.).

### **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 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,

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<sup>1</sup> *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161)*

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) L Line also provides transit/rail access to downtown Los Angeles, City of Pasadena, and the northern San Gabriel Valley.

## **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, a 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 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 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. 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 HCD has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. As discussed in Section 2.0. Environmental Setting and Project Description, the Court Order requires the City to place a ballot measure, by December 31, 2024, proposing 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).

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

The Project would accommodate a total of 2,775 residential DUs, including the HCD-required 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 EA). The full buildout of the Project, for purposes of this EA, 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 Project 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 proposed 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 (i.e., SCAG) requirements. EA

## **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 EA 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 EA:

- **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 Project contemplated by the City prior to the inclusion of the 6<sup>th</sup> Cycle RHNA allocation. 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).

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## **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 EA; 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 a summary of areas of controversy known to the Lead Agency, including issues raised by the public agencies and the public, should be included. The primary environmental areas of controversy that have been raised to date related to implementation of the Project are: traffic, parking, water supply, and water and wastewater infrastructure.

## **SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS**

Through preparation of an Initial Study, it was determined that, except for 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. This EA 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

Based on the analysis presented in the EA, implementation of the proposed Project would result in the following significant and unavoidable impacts after implementation of feasible mitigation measures:

- Air Quality (Air Quality Management Plan Consistency, Air Quality Standards Violation, and Cumulative Air Quality Impacts);
- Greenhouse Gas Emissions (GHG Emissions, Plan Consistency);
- Noise (Direct and Cumulative Construction and Exterior Traffic Noise Standard Violation); and
- Population and Housing (Population Growth).

Table ES-1 presents a summary of significant environmental impacts identified in Sections 3.1 through 3.16 of this EA; 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.

**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
<b>Section 3.2 – Air Quality</b>		
<p>Because the Project 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, air pollutant emissions for construction activity have not been quantified. Although all feasible mitigation measures must be applied to minimize regional and/or location construction emissions that exceed the South Coast Air Quality Management District (SCAQMD) thresholds, future development projects have the potential to result in significant and unavoidable impacts.</p>	<p><b>MM AQ-1:</b> To assess regional air pollutant emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific air quality analysis that includes mitigation measures, as needed, to reduce the any significant impacts to the maximum extent feasible. Applicants/Developers shall also assess the localized emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> from the construction of individual projects in proximity to sensitive receptors (e.g., residences, schools, hospitals), associated with the maximum daily construction activities for proposed individual developments.</p> <p>If project-specific mitigation is required for regional and/or localized emissions due to exceedances of any SCAQMD threshold, mitigation measures must include one or more of the following, or include equally effective measures, as follows:</p> <ul style="list-style-type: none"> <li>• For construction equipment greater than 150 horsepower (&gt;150 HP), the Applicant/Developer shall require the construction contractor to use off-road diesel construction equipment that complies with minimum USEPA/CARB Tier 3 emissions standards during all construction phases. If the project-specific analysis indicates that Tier 3 off-road equipment would not reduce the impact to a less than significant level, off-road diesel equipment that complies with CARB Tier 4 (interim or final) emissions standards shall be used, as appropriate, or the best available emissions technology available at the time of project construction.</li> <li>• The Applicant/Developer shall require the construction contractor to ensure that all construction equipment be tuned and maintained in accordance with the manufacturer’s specifications.</li> <li>• The Applicant/Developer shall require the construction contractor to use electricity to power on-site generators and other construction-related equipment and activities, if available and feasible, rather than using diesel-powered internal combustion engines.</li> <li>• The Applicant/Developer shall require the construction contractor to maintain all construction equipment in good operation condition and ensure that all construction equipment is being properly serviced and maintained as per the</li> </ul>	<p>Significant and unavoidable</p>

**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
	manufacturer's specification. Maintenance records shall be available at the construction site for City verification.	
Operational activities associated with the Project (area sources, energy sources, mobile sources, and stationary sources) would result in emissions of CO, VOCs, NOx, SOX, PM10, and PM2.5. Estimated operational emissions from buildout of the Project would exceed the SCAQMD thresholds for VOC and NOx.	Refer to <b>MM AQ-1</b> .	Significant and unavoidable
The Project has the potential to conflict with the applicable 2016 Air Quality Management Plan (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 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) population, housing, and employment projections and consequently air emissions that are included in the 2016 AQMP.	Refer to <b>MM AQ-1</b> . There are no feasible mitigation measures to reduce or avoid the impact related to the inconsistency with the 2016 RTP/SCS.	Significant and unavoidable impact
Potential residential units that would be proposed near SR-110. The California Air Resources Board recommends site-specific evaluation prior to siting any sensitive land use near a source of toxic air contaminants (TACs).	<b>MM AQ-2</b> An 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/m <sup>3</sup> , PM2.5 concentrations exceed 2.5 µg/m <sup>3</sup> , 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),	Less than significant

**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
	<p>including appropriate enforcement mechanisms, prior to issuance of a grading permit. Measures to reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Air intakes located away from high volume roadways and/or truck loading zones.</li> <li>• 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).</li> </ul> <p>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.</p>	
<b>Section 3.3 – Biological Resources</b>		
<p>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.</p>	<p><b>MM BIO-1</b> A qualified biologist shall conduct nesting bird surveys in areas with potentially suitable habitat prior to all 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).</p> <p>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.</p> <p>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.</p> <p><b>MM BIO-2</b> 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</p>	<p>Less than significant</p>



**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 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.	
Some properties adjacent to undeveloped or vacant open space areas that have potential to support various special status plant and wildlife species may be developed under the Project.	<b>MM BIO-3</b> Within three 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 of recommendations to residents, businesses, and/or developers of future projects in hillside areas that require fire-resistant construction and landscaping.	Less than significant
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.	<b>MM BIO-4</b> 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.	Less than significant

**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
<p>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.</p>	<p><b>MM BIO-5</b> 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.</p>	<p>Less than significant</p>
<p><b>Section 3.4 – Cultural and Tribal Cultural Resources</b></p>		
<p>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.</p>	<p><b>MM CUL-1</b> 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</p>	<p>Less than significant</p>

**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
	<p>approval of the Mitigation Plan by the City, the Project shall be implemented in compliance with the Plan.</p> <p>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.</p>	
<b>Section 3.6 – Geology and Soils</b>		
<p>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.</p>	<p><b>MM GEO-1</b> Should potential paleontological resources be found during ground-disturbing activities for any individual project implemented under the General Plan and DTSP Update &amp; 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.</p>	<p>Less than significant</p>

**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
<b>Section 4.6 – Greenhouse Gas Emissions</b>		
<p>Because the Project identifies future land uses and does 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 for construction activity have not been quantified.</p> <p>At the program level, operational GHG emissions must be considered potentially significant and the Project may generate GHG emissions that would have a significant impact on the environment.</p>	<p><b>MM GHG-1</b> To assess GHG emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific GHG emissions analysis that includes mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible.</p> <p>Alternatively, the Applicant/Developer of future development projects shall demonstrate that the proposed Project is consistent with the South Pasadena 2020 Final Climate Action Plan. If consistency is demonstrated, the Project would have a less than significant GHG Emissions impact.</p>	Significant and unavoidable
<b>Section 3.8 – Hazards and Hazardous Materials</b>		
<p>There may be sites in the City impacted by hazardous materials or hazardous wastes from historic use that are not identified on current databases.</p>	<p><b>MM HAZ-1</b> Prior to the issuance of a grading permit, Applicants for future development projects shall:</p> <p>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.</p> <p>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).</p>	Less than significant

**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
	<p>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.</p> <p><b>MM HAZ-2</b> 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.</p>	
<b>Section 3.11 – Noise</b>		
<p>The increase in traffic noise levels due to the Project would not be perceptible to the human ear. However, residential uses within the focus areas would experience future exterior noise levels greater than the <i>normally acceptable</i> compatibility criteria identified in the existing General Plan Safety and Noise Element.</p>	<p><b>MM NOI-1</b> Prior to the issuance of a building permit for new 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 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.</p>	<p>Significant and unavoidable</p>

**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
<p>The estimated traffic noise contours indicate some focus areas would experience exterior noise levels, which exceed 70 dBA community noise equivalent level (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.</p>	<p><b>MM NOI-2</b> Prior to the issuance of a building permit for new 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 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.</p>	<p>Less than significant</p>
<p>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 activities, outdoor restaurant dining and music activities, and parking lot vehicle movements.</p>	<p><b>MM NOI-3</b> 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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Acoustical isolation between units has been included in the project design for residential dwelling units situated above non-residential uses.</li> </ul>	<p>Less than significant</p>
<p>Construction activities requiring pile driving are anticipated to exceed the applicable Federal Transit Administration (FTA) noise thresholds at distances of 200 feet or less.</p>	<p><b>MM NOI-4</b> 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:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>Significant and unavoidable</p>

**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
	<p>exterior noise and vibration levels to below FTA noise and County of Los Angeles vibration thresholds.</p> <ul style="list-style-type: none"> <li>• 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:               <ul style="list-style-type: none"> <li>○ 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:                   <ul style="list-style-type: none"> <li>▪ 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;</li> <li>▪ 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.</li> </ul> </li> </ul> </li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>MM NOI-7</b> 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</p>	

**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
	<p>required to implement the following measures to reduce noise levels from construction activity:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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</li> <li>• 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.</li> </ul>	
<p>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.</p>	<p>Refer to <b>MM NOI-4</b></p>	<p>Less than significant</p>



**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
<p>Vibration levels during construction exceeding standards have the potential to damage fragile historic structures.</p>	<p><b>MM NOI-5</b> The Project Applicant/Developer of any site-specific development within 25 feet of an extremely fragile historic building, as defined by the South Pasadena Historic Resources Survey, 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.</p>	<p>Less than significant</p>
<p>Some residential and non-residential uses within the focus areas are anticipated to be located within 50 feet of the Metro L Line railroad tracks and may experience vibration levels that can exceed the residential and non-residential vibration criteria for frequent rail events.</p>	<p><b>MM NOI-6</b> Prior to the issuance of a building permit for new development projects within 50 feet of the Metro L 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.</p>	<p>Less than significant</p>
<p><b>Section 3.12 – Population and Housing</b></p>		
<p>Buildout of the Project would exceed the housing and population growth projections presented in the Southern California Association of Governments (SCAG) 2020-2045 RTP/SCS. This is solely because the 2020-2045 RTP/SCS projections are inconsistent with the 6<sup>th</sup> Cycle Regional Housing Needs Assessment.</p>	<p>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 State law and susceptible to a variety of penalties, including monetary fines.</p>	<p>Significant and unavoidable</p>

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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 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 City is the subject of a Court Order<sup>1</sup> to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. 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. As part of this Court Order, pursuant to Government Code Section 65759(a), an agency under such court order the City 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 (State California Environmental Quality Act [CEQA] Guidelines) (Government Code Section 65759(a)(1)). If the local agency determines that the action may have a significant effect on the environment, it shall then prepare, within the time limitations specified, an environmental assessment, 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 Title 14 of the California Code of Regulations (Government Code Section 65759(a)(2)). Should the Initial Study demonstrate that associated actions may have a significant effect on the environment, the City shall prepare an Environmental Assessment (EA) within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the content required for a Draft Environmental Impact Report set forth in Article 9 of the California Code of Regulations. 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 into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]). This EA has been prepared in compliance with Government Code Section 6575965769, et. seq.

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<sup>1</sup> *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161)*

This EA is based on environmental analysis of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). While the General Plan and DTSP Update remain in preparation, the maximum non-residential development capacity (i.e., 430,000 square feet) and distribution would be the same as contemplated in past drafts of these documents.

### **1.1.2 REGULATORY FRAMEWORK**

This EA 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 (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 2021–2029 Housing Element) does not directly lead to environmental impacts or changes to the environment, future development in the City, 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 Project has the potential for indirect environmental impacts, this EA has been prepared at a programmatic level.

The purpose of this EA 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 EA (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 EA 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 EA 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 EA 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.

### 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 Project. As such, the City is serving as the Lead Agency and is responsible for preparing this EA.

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 EA.

The EA analyzes the effects of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress. Refer to Section 2.0, Environmental Setting and Project Description, for further details.

## 1.2 **PROJECT SPONSOR AND CONTACT PERSON**

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

Ms. Alison Becker, AICP  
Deputy Director –Community Development Department  
1414 Mission Street  
South Pasadena, California 91030  
[GeneralPlan@SouthPasadenaCA.gov](mailto:GeneralPlan@SouthPasadenaCA.gov)  
Phone: 626.403.7220

A hard copy of the EA, including any technical appendices, 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

## **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) L Line also 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 1, Regional and Local Vicinity.

### **2.2 PROJECT SETTING AND CHARACTERISTICS**

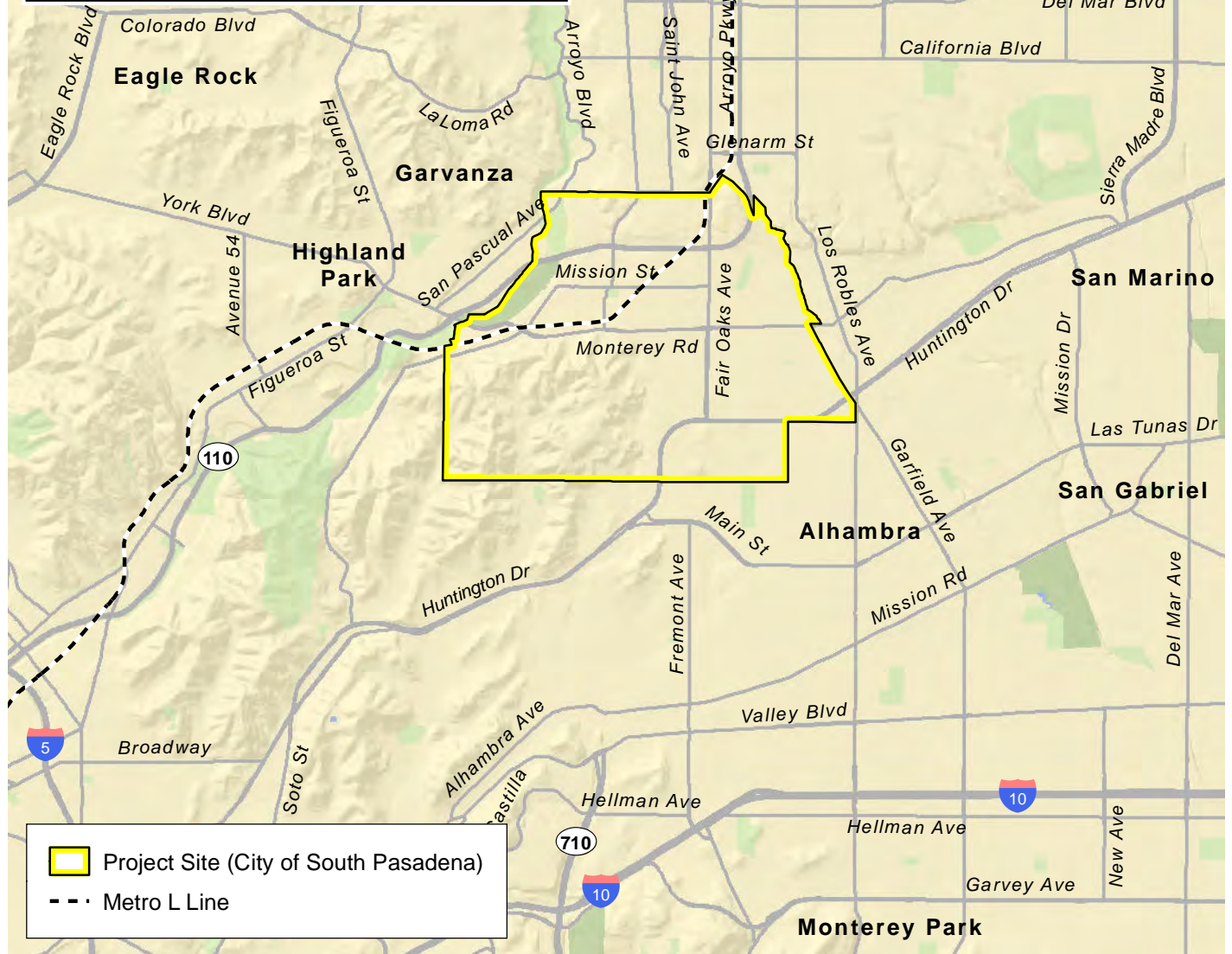
The planning area includes approximately 3.5 square miles, or 2,272 acres, within the incorporated City of South Pasadena limits.

Unless otherwise specified, proposed Project or Project refers to both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and Downtown (DTSP) Update still in progress 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).

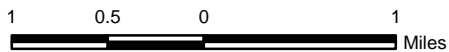
The San Gabriel Valley (Valley) is an approximately 400-square-mile area at the eastern portion of Los Angeles County. It is home to approximately 1.8 million persons living in 31 cities and 5 unincorporated communities (LAEDC 2018). The Valley is bound on the north by the San Gabriel Mountains, on the 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.



Project Site (City of South Pasadena)  
 Metro L Line

## Regional and Local Vicinity

South Pasadena 2021-2029 Housing Element



## Exhibit 1





## **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 L 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 Environmental Assessment (EA).

### **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 is 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<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>; portions of the County, not including the City, are designated nonattainment for NO<sub>2</sub> 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<sub>3</sub>, PM<sub>2.5</sub>, and NO<sub>2</sub>. The 2019 (most recent data available) readings show that the federal 1-hour standard for O<sub>3</sub> was exceeded a total of 11 days, while the State 8-hour standard was exceeded 29 days; and the 1-hour standard was exceeded a total of 12 days. There are no federal or State standards for NO<sub>2</sub> or PM<sub>2.5</sub>. Air quality is discussed in Section 3.2 of this EA.

## **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. 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 EA.

## **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. Based on the survey of historic resources compiled in 2017, 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 (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 EA.

## **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 EA.

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

### **2.2.3 RELEVANT PLANNING CONSIDERATIONS**

#### **Regional Plans**

South Pasadena is within the boundaries of 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 EA.

#### **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.

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 contains 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 L 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* (SPMC) 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 EA.

### ***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 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).

## **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**

### **2.3.1 EXISTING GENERAL PLAN AND HOUSING ELEMENT**

The City is a general-law city<sup>1</sup>, 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

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<sup>1</sup> 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.

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, Existing Land Use Policy Map, depicts the current land use plan for the City. The expected level of development represented by the adopted General Plan is also quantified in the existing Land Use Element, reflecting the building intensity and population density standards for various areas set forth at the time of adoption.

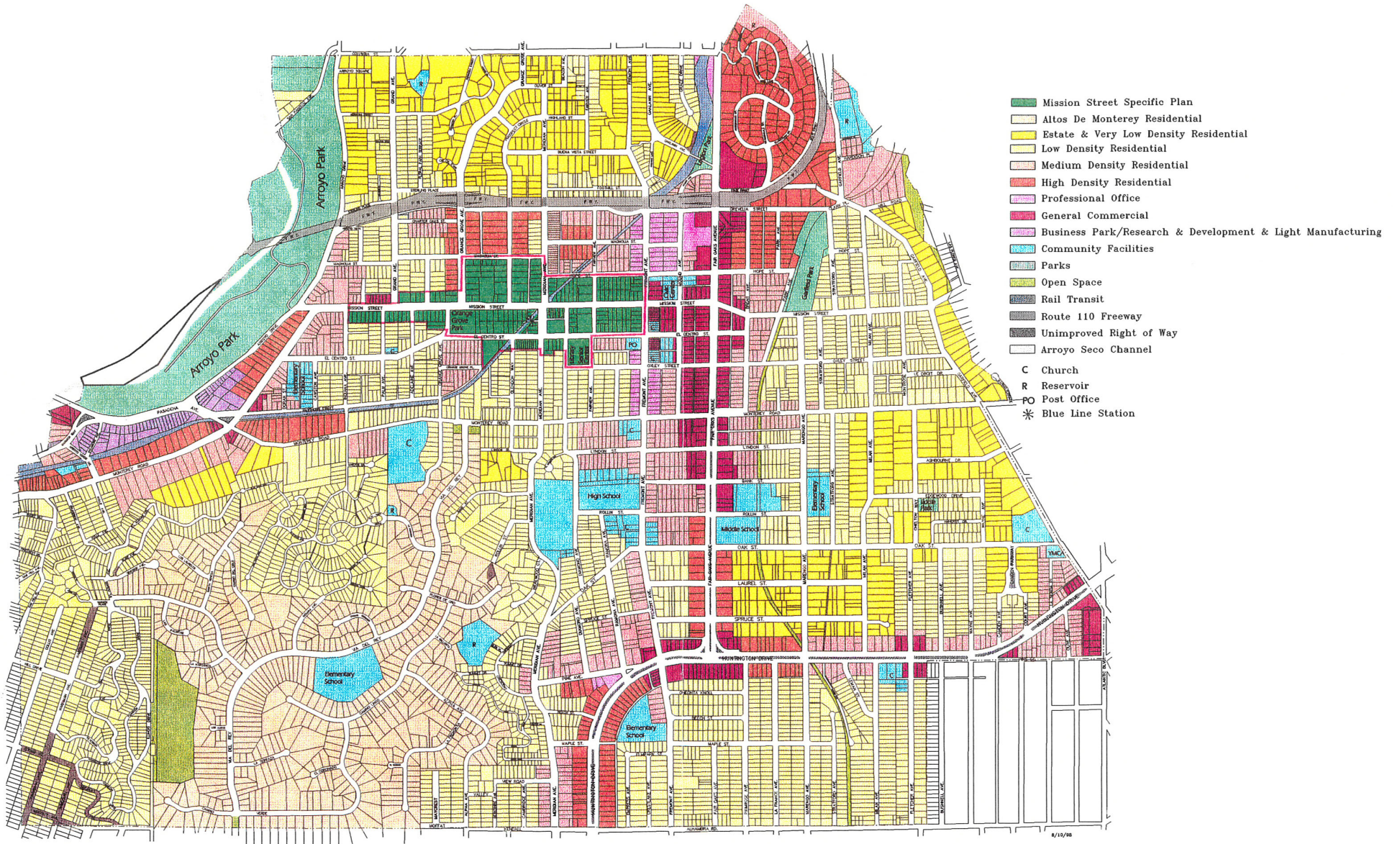
The 5<sup>th</sup> Cycle (2012) RHNA indicated that the City had a need for 63 DUs to be provided, distributed across the four income levels established by the California Department of Housing and Community Development (HCD), and shown in Table 2-1.

**TABLE 2-1  
2014–2021 HOUSING ELEMENT RHNA ALLOCATION**

Income Group	Number of New Units	Percentage
Very Low Income	17*	27%
Low Income	10	16%
Moderate Income	11	17%
Above Moderate Income	25	40%
<b>Total</b>	<b>63</b>	<b>100%</b>
*Includes 9 units (approximately 50%) of Extremely Low Income group units Source: South Pasadena 2014.		

**Environmental Baseline**

Pursuant to CEQA and the State CEQA Guidelines, the assessment of environmental impacts from buildout of the City pursuant to the Project 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 2-2, 1998 General Plan (2010 Forecast) and Existing Land Uses, presents the 1998 General Plan’s anticipated 2010 development capacity and existing land uses in terms of total residential and non-residential acres within the City.

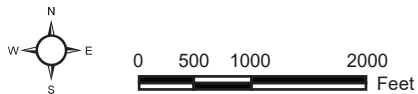


Source: City of South Pasadena 2018

# Existing Land Use Policy Map

## South Pasadena 2021-2029 Housing Element

# Exhibit 2



**TABLE 2-2  
1998 GENERAL PLAN (2010 FORECAST) AND  
EXISTING LAND USES**

Land Use Category	1998 General Plan (Acres)	Existing (2018) (Acres) <sup>a</sup>
<b>Residential</b>		
Altos de Monterey	236.3	234.2
Estate/Very Low Density	214.8	215.6
Low Density	624.9	645.9
Medium Density	168.0	173.0
Medium-High Density	0.0	0.0
High Density	129.7	117.8
<i>Subtotal</i>	<i>1,373.7</i>	<i>1,386.3</i>
<b>Commercial</b>		
Neighborhood	0.0	0.0
General	83.4	64.8
<i>Subtotal</i>	<i>83.4</i>	<i>64.8</i>
<b>Office</b>		
Professional	17.0	16.9
Other	0.0	0.0
<i>Subtotal</i>	<i>17.0</i>	<i>16.9</i>
<b>Other Land Uses</b>		
Mission Street Specific Plan	40	40
Mixed Use	0.0	0.0
Light Industrial	13.0	12.2
Community Facilities	80.4	85.0
Other <sup>b</sup>	6513.5	667.0
<b>Total All Land Uses</b>	<b>2,221</b>	<b>2,272</b>
Note: Some totals may not add due to rounding.		
<sup>a</sup> 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.		
<sup>b</sup> Includes open space, parks, utility, and right-of-way.		
Source: Inloes 2018.		

### 2.3.2 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.

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. The City-wide growth projections shown in Table 2-2 above include the MSSP area.



### **2.3.3 PURPOSE AND USE OF THE PROJECT**

This EA evaluates the environmental impacts of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress. 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.

The environmental analysis in this EA is based on the content of the Fifth Draft Housing Element (May 5, 2023 version) demonstrating capacity for up to 2,775 DUs as well as buildout of 430,000 sf of non-residential development with a baseline of April 2021 (distribution of the RNOP of the EA), unless otherwise noted (some analyses consider 2022 and 2023 conditions, dependent on public data availability).

### **2.3.4 PLANNING PROCESS**

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. 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.

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 Project.

The City’s civic engagement process continued during preparation of public drafts of the Project, 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.

## **2.4 PROPOSED PROJECT DESCRIPTION**

This EA is based on environmental analysis of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). While the General Plan and DTSP Update remain in preparation, the maximum non-residential development capacity (i.e., 430,000 square feet) and distribution would be the same as contemplated in past drafts of these documents.

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 each include eight chapters, and each of the chapters features an overarching goal, with policies and actions based on the goal. The eight 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.

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 code is 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.

Please refer to the entirety of the proposed General Plan and DTSP Update, available online at: [General Plan & Downtown Specific Plan Update | South Pasadena, CA \(southpasadenaca.gov\)](https://southpasadenaca.gov/general-plan-downtown-specific-plan-update), for further details.

The 2021–2029 Housing Element is being analyzed in this EA. The components of the 2021–2029 Housing Element are prescribed by State law and include a housing needs assessment, constraints analysis, review of past performance, and a housing plan. The housing plan includes goals, policies, and programs to support and encourage housing construction to achieve the RHNA allocation. The housing plan includes measurable targets that are monitored on an annual basis through HCD’s Annual Progress Reporting system.

Please refer to the entirety of the proposed 2021–2029 Housing Element, available online at: [Housing Element Update 2021-2029 | South Pasadena, CA \(southpasadenaca.gov\)](https://southpasadenaca.gov/housing-element-update-2021-2029), for further details.

#### **2.4.1 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 (6<sup>th</sup> 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. Accordingly, the proposed Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation, 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. Considering both community feedback and State and regional requirements, the central strategy of the 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. In summary, the Project encourages the majority of new housing 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. The 2021-2029 Housing Element provides 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.

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 more than the last cycle. A local government’s identified RHNA includes both the existing and projected housing needs of the locality. Additionally, HCD has required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. Table 2-3 summarizes the 6<sup>th</sup> Cycle RHNA allocation for the City of South Pasadena that the Project accommodates.

**TABLE 2-3  
2021–2029 HOUSING ELEMENT RHNA ALLOCATION**

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

Because of the unusually high RHNA allocation plus required 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. Therefore, this EA has been prepared based on the *Fifth Draft 2021–2029 Housing Element* dated March 2023.

The City is the subject of a Court Order<sup>2</sup> to bring its Housing Element into compliance with State housing law, pursuant to Government Code Section 65754. 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. As part of this Court Order, pursuant to Government Code Section 65759(a), an agency under such court order the City 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 (State California Environmental Quality Act [CEQA] Guidelines) (Government Code Section 65759(a)(1)). If the local agency determines that the action may have a significant effect on the environment, it shall then prepare, within the time limitations specified, an environmental assessment, 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 Title 14 of the California Code of Regulations (Government Code Section 65759(a)(2)). Should the Initial Study demonstrate that associated actions may have a significant effect on the environment, the City shall prepare an Environmental Assessment (EA) within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the content required for a Draft Environmental Impact Report set forth in Article 9 of the California Code of Regulations. 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 into compliance with any Court Order or judgment under Article 14 (Government Code Section 65759[a]). This EA has been prepared in compliance with Government Code Section 6575965769, et. seq.

### **Height Limits**

In April 2022, during preparation of the 2021-2029 Housing Element and this EA, a lawsuit was filed alleging that the City was in violation of State Planning Law because the City had not adopted a 6<sup>th</sup> 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 Case 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. As of August 2022, a total of 25 SCAG jurisdictions have adopted a State-law-compliant housing element (HCD 2022). This reflects the difficulties most municipalities are facing with preparing a 6<sup>th</sup> cycle housing element that accommodates the high RHNA allocations throughout the SCAG region.

In August 2022, as discussed above, a Court Order was entered on the lawsuit requiring certain actions by the City within certain timeframes to bring the Housing Element into compliance with

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<sup>2</sup> *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161)*

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 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.

This requirement to place a ballot initiative stems from the lawsuit questioning whether a density of 50 DU/acre, as proposed for some areas in the Housing Element, could be constructed under a height limit of 45 feet. As noted above, the City has a high RHNA allocation. To meet this allocation, higher density residential or mixed-use with residential is needed, particularly near transit (including both light rail and bus). What height(s) new development could be, under this scenario, if the ballot initiative passes, is not resolved at this time. It could be dependent on what height would be necessary to achieve density proposed on a given site (e.g., a one-acre site of 70 DU/acre would be taller than a one-acre site of 60 DU/acre, assuming all other variables are the same). Precisely what the content of this ballot measure will be is not settled, apart from being applicable only where a density of more than 50 DU/acre is proposed and will not be settled until City Council considers the issue in the future. The measure will have two variables: (1) height above 45 feet and (2) the footprint of where that piercing of the 45-foot limit will be allowed.

Once the language of the measure is finalized, environmental review would be presented to the City Council for formal action to place such measure on the ballot. After environmental review is complete, it could be presented for vote via a special election or at the November 2024 general election. The deadline for council action to place the matter on the November 2024 election is August 9, 2024. Nevertheless, 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. Accordingly, the potential for projects with buildings greater than 45 feet in height is addressed as a potential impact in this EA.

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 EA.

## 2.4.2 DEFINITION OF PLANNING COMPONENTS AND TERMS

Goals and policies 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.

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. 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 EA.

### 2.4.3 PROJECT DEVELOPMENT PATTERN AND CAPACITY

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 2021-2029 Housing Element continues to be preservation of existing housing stock and directing calibrated growth.

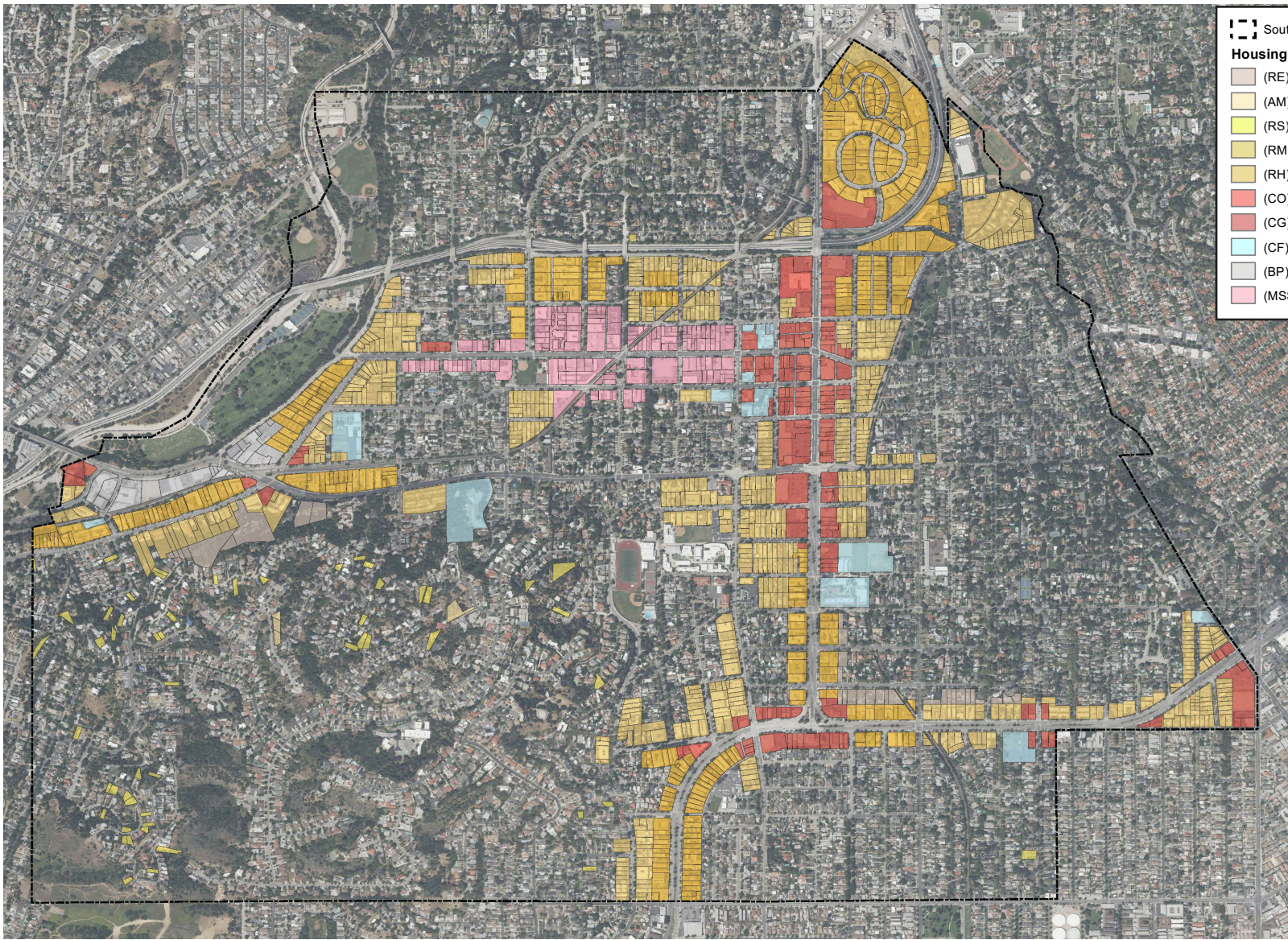
Preserving housing supports sustainability objectives, and it is also less expensive to create affordable units in existing housing stock. However, to accommodate the 6<sup>th</sup> Cycle RHNA allocation, the City must determine policies and zoning thresholds that allow and encourage production of new housing units in a manner that South Pasadena has not contemplated in the past. The multi-pronged strategy that the housing element update relies 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, an update and expansion of the 1996 Mission Street Specific Plan.

The Project encourages most of the 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. In addition, the Project introduces an affordable housing overlay district to allow projects with affordable housing to be distributed across the City on appropriate sites. The Housing Element update balances 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. Exhibit 2, Existing Land Use Policy Map, and Exhibit 3, Citywide Sites Inventory Map, depict the proposed distribution and extent of the categories of public and private uses of land.

The Project does 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. Individual projects would continue to be subject to the City's development review process and the CEQA process, as applicable. Therefore, this EA considers the environmental impacts associated with the reasonably foreseeable direct and indirect physical changes in the environment that would occur due to land use and infrastructure development, and from the associated population and employment growth in the City, due to buildout as projected. 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 EA, development of the proposed growth identified in the General Plan is assumed to occur by the horizon year of 2040.

The Project analyzed herein would accommodate a maximum of 2,775 DUs (i.e., the 6<sup>th</sup> Cycle RHNA allocation and HCD-required surplus) and 430,000 sf of non-residential uses, comprised of retail and office development, in addition to existing land uses. It is noted, there would be a separate environmental review process when the next housing element update is prepared. Table 2-4, Summary of Existing and Projected Demographics, presents the existing and buildout residential, non-residential, and population figures.

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- South Pasadena City Boundary**
- Housing Site Inventory**
- (RE) Residential Estate
  - (AM) Altos De Monterey Residential
  - (RS) Residential Low Density
  - (RM) Residential Medium Density
  - (RH) Residential High Density
  - (CO) Commercial Office
  - (CG) Commercial General
  - (CF) Community Facility
  - (BP) Business Park
  - (MSSP) Mission Street Specific Plan

Source: City of South Pasadena 2023

# Citywide Sites Inventory Map

# Exhibit 3

South Pasadena 2021-2029 Housing Element





**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 <sup>a</sup>	866,000 <sup>b</sup>	390,000 <sup>b</sup>	25,580 <sup>a</sup>
Proposed Citywide Totals	2,272	13,931	996,000	690,000	32,462
<b>Difference</b>	–	<b>2,775 (25%)</b>	<b>130,000 (15%)</b>	<b>300,000 (77%)</b>	<b>6,882 (27%)</b>

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:  
<sup>a</sup> DOF 2022  
<sup>b</sup> 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<sup>3</sup> and 6,882 more residents<sup>4</sup> 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 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 EA.

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 an 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.

<sup>3</sup> Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).

<sup>4</sup> Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

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 growth areas.

## **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 EA uses the second method, which focuses on regional projections, assuming future growth and development reflects these projections. The proposed Project establishes 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 EA 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 Project. Each environmental topic in Section 3.0 of this EA 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 assess the Project’s cumulative impacts effectively or reasonably from the .

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 EA 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. The proposed Project seeks 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. 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.
4. Develop clear and precise standards that offer predictable outcomes and processes.
5. 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.
6. 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.

## **2.7 INTENDED USES OF THE EA**

The primary discretionary action by the City supported by this EA is adoption of the 2021–2029 Housing Element, as a policy document. It is important to note that the General Plan and DTSP Update (when adopted) and this proposed 2021–2029 Housing Element 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. The proposed 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 (i.e., SCAG) requirements.

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## SECTION 3.0 ENVIRONMENTAL ANALYSIS

This section analyzes the potential environmental impacts associated with approval and implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). While the revision/update of a policy document does not directly lead to environmental impacts or changes to the environment, future development in the City would lead to physical changes that could, in turn, potentially result in environmental impacts. Therefore, the environmental analyses within this section of the Environmental Assessment (EA) focus on the potential environmental impacts of future development and redevelopment that would be allowed with implementation of the Project.

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 EA 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. This section provides the baseline conditions with which environmental changes associated with the Project have been compared and analyzed.

#### **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 EA. 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).

#### **Proposed Housing Element Goals and Policies**

While the 2021–2029 Housing Element allows future developments that could adversely affect the environment, it also seeks to preserve and protect the existing environment and resources in the City. Similarly, the non-residential development capacity envisioned in the General Plan and DTSP Update would allow future development that could adversely affect the environment. However, this EA is prepared solely in support of the 2021–2029 Housing Element and thus the applicable Housing Element goals and policies are identified in this section.

## **Environmental Impacts**

The analysis of environmental impacts presented in this EA identifies direct and indirect, as well as short-term and long-term environmental impacts of the Project. While adoption of the 2021–2029 Housing Element itself would not result in direct or immediate changes to the environment, implementation of 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 EA 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 EA 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 anticipated development under the proposed Project on a cumulative level, are addressed in each topical analysis presented in Section 3.0 of this EA, 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 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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 Project.

#### **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 20<sup>th</sup> 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-foot building height limit. 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.

### **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 Boards 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 June 4, 2021. 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 EA 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 HOUSING ELEMENT GOALS AND POLICIES**

#### **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, in particular in the Ostrich Farm area and along Mission Street, Fair Oaks Avenue, and Huntington Drive.

The 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 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 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.

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 would 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. Overall public views of the hillsides and mountains would not appreciably change with implementation of the Project. Implementation of the Project 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 historic resources, nor do they exemplify a unique form of architecture. Further, as discussed below under Threshold 3.1c, 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. 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 myriad 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 Project 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 Project 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 and by City staff members. The Design Review Board is a five-member body that is advisory to the Planning Commission and represents the professions of architecture, landscape architecture, interior design, graphics, or related fields. Design Review Board meetings are held monthly. 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.

It is acknowledged that 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 potential housing and mixed-use or non-residential 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 L Line Station. Also, the potential housing sites are identified where needed to meet the State's mandate. Implementation of the Project would result in less than significant impacts related to visual character, and no mitigation is required.

**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.

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. 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**

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 Project, 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 Project. 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 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. As such, development under the Project would not incrementally contribute to a significant cumulative impact related to visual quality.

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 Project would not incrementally contribute to a significant cumulative impact to light and glare in the region.

### **3.1.8 MITIGATION MEASURES**

No significant adverse impacts related to aesthetics have been identified with implementation of the Project. Therefore, no mitigation is required.

### **3.1.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Less than significant.

### 3.1.10 REFERENCES

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- California Department of Transportation (Caltrans). 2023 (April 26, access date). California Scenic Highway Program Map. Sacramento, CA: Caltrans. California State Scenic Highway System Map. California State Scenic Highway System Map (arcgis.com).
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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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project).

### **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.

Due to its generally clear weather, about three-quarters of available sunshine is received in the SoCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year there are

approximately 10 hours of possible sunshine, and on the longest day of the year there are approximately 14.5 hours of possible sunshine.

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. Another characteristic wind regime in the SoCAB is the “Catalina Eddy,” a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections.

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 an impervious 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 NO<sub>x</sub> and CO from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline.

### **Wind Patterns and Project Location**

The distinctive climate of the City and the SoCAB is determined by its terrain and geographical location. The SoCAB is located 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.

Wind patterns across the south coastal region are characterized by westerly and southwesterly on-shore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season.

## **Criteria Pollutants**

A criteria pollutant is an air pollutant for which acceptable levels of exposure can be determined and for which an ambient air quality standard has been set. A description of each criteria pollutant is provided below:

- **Ozone (O<sub>3</sub>):** A highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- **Carbon Monoxide (CO):** A colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the SoCAB. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- **Particulate Matter less than or equal to 10 microns (PM<sub>10</sub>):** A major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. PM<sub>10</sub> also causes visibility reduction.
- **Fine Particulate Matter less than or equal to 2.5 microns (PM<sub>2.5</sub>):** A similar air pollutant to PM<sub>10</sub> consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO<sub>2</sub> release from power plants and industrial facilities and nitrates that are formed from NO<sub>x</sub> release from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions.
- **Nitrogen Dioxide (NO<sub>2</sub>):** NO<sub>2</sub> may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of nitrogen oxide compounds, NO<sub>2</sub> is the most abundant in the atmosphere. As ambient concentrations of NO<sub>2</sub> are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO<sub>2</sub> than those indicated by regional monitors.
- **Sulfur Dioxide (SO<sub>2</sub>):** A colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO<sub>2</sub> oxidizes in the atmosphere, it forms sulfates (SO<sub>4</sub>). Collectively, these pollutants are referred to as sulfur oxides (SO<sub>x</sub>).
- **Lead (Pb):** A heavy metal that is highly persistent in the environment. In the past, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of the removal of lead from gasoline, there have been no violations at any of the SCAQMD's regular air monitoring stations since 1982. Currently, emissions of lead are largely limited to stationary sources such as lead smelters and automobile battery manufacturing and processing. It should be noted that the Project is not anticipated to generate a quantifiable amount of lead emissions.



### ***Related Pollutants***

- ***Volatile Organic Compounds (VOC):*** Hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O<sub>3</sub>, which is a criteria pollutant. The SCAQMD uses the terms VOC and Reactive Organic Gases (ROG) interchangeably.
- ***Nitrogen Oxides (NO<sub>x</sub>):*** NO<sub>x</sub> consists of nitric oxide (NO), nitrogen dioxide (NO<sub>2</sub>) and nitrous oxide (N<sub>2</sub>O) and are formed when nitrogen (N<sub>2</sub>) combines with oxygen (O<sub>2</sub>). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition.

### **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. National Ambient Air Quality Standards (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.

**TABLE 3.2-1  
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	National Standards	
			Primary <sup>a</sup>	Secondary <sup>b</sup>
O <sub>3</sub> <sup>c</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	–	–
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )	0.070 ppm (137 µg/m <sup>3</sup> )	Same as Primary
PM10	24 Hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	Same as Primary
	AAM	20 µg/m <sup>3</sup>	–	Same as Primary
PM2.5	24 Hour	–	35 µg/m <sup>3</sup>	Same as Primary
	AAM	12 µg/m <sup>3</sup>	12.0 µg/m <sup>3</sup>	15.0 µg/m <sup>3</sup>
CO	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	35 ppm (40 mg/m <sup>3</sup> )	–
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )	–	–
NO <sub>2</sub>	AAM	0.030 ppm (57 µg/m <sup>3</sup> )	0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary
	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	0.100 ppm (188 µg/m <sup>3</sup> )	–
SO <sub>2</sub>	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m <sup>3</sup> )
	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	0.075 ppm (196 µg/m <sup>3</sup> )	–
Lead	30-day Avg.	1.5 µg/m <sup>3</sup>	–	–
	Calendar Quarter	–	1.5 µg/m <sup>3</sup>	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m <sup>3</sup>	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles ( 0.07 per km – ≥30 miles for Lake Tahoe)	<b>No National Standards</b>	
Sulfates	24 Hour	25 µg/m <sup>3</sup>		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )		

O<sub>3</sub>: ozone, ppm: parts per million, µg/m<sup>3</sup>: 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<sup>3</sup>: milligrams per cubic meter, NO<sub>2</sub>: nitrogen dioxide, SO<sub>2</sub>: sulfur dioxide, km: kilometer.

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

<sup>b</sup> *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](http://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. In 2019, both the NAAQS and CAAQS for O<sub>3</sub> were exceeded for more than 100 days in the SoCAB; exceedances of PM<sub>10</sub>, and PM<sub>2.5</sub> also occurred but less frequently. Table 3.2-2, Attainment Status of Criteria Pollutants in the SoCAB, summarizes the attainment designations for the SoCAB. All of the County of Los Angeles (County) is designated as a nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>; portions of the County, not including the City are designated nonattainment for NO<sub>2</sub> and lead.

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

<b>Pollutant</b>	<b>State</b>	<b>Federal</b>
O <sub>3</sub> (1 hour)	Nonattainment	No standards
O <sub>3</sub> (8 hour)	Nonattainment	Extreme Nonattainment
PM <sub>10</sub>	Nonattainment	Attainment/Maintenance
PM <sub>2.5</sub>	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO <sub>2</sub>	Attainment	Attainment/Maintenance
SO <sub>2</sub>	Attainment	Attainment
Lead	No Standard	Nonattainment/Attainment <sup>a</sup>
All others	Attainment/Unclassified	No standards

O<sub>3</sub>: ozone; PM<sub>2.5</sub>: respirable particulate matter 10 microns or less in diameter; PM<sub>2.5</sub>: fine particulate matter 2.5 microns or less in diameter; CO: carbon monoxide; NO<sub>2</sub>: nitrogen dioxide; SO<sub>2</sub>: sulfur dioxide; SoCAB: South Coast Air Basin.

<sup>a</sup> 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<sub>3</sub>, PM<sub>2.5</sub>, and NO<sub>2</sub>. 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 (2017-2019), 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 (2017-2019)**

Pollutant	California Standard	National Standard	Year	Max. Level <sup>a</sup>	State Standard Days Exceeded <sup>b</sup>	National Standard Days Exceeded <sup>b, c</sup>
O <sub>3</sub> (1 hour)	0.09 ppm	None	2017	0.139	18	NA
			2018	0.112	8	NA
			2019	0.120	11	NA
O <sub>3</sub> (8 hour)	0.070 ppm	0.070 ppm	2017	0.100	38	36
			2018	0.091	20	19
			2019	0.098	29	24
NO <sub>2</sub> (1 Hour)	0.18 ppm	0.100 ppm	2017	0.072	0	0
			2018	0.068	0	0
			2019	0.059	0	0
NO <sub>2</sub> (AAM)	0.030 ppb	0.053 ppb	2017	0.015	No	No
			2018	0.014	No	No
			2019	0.013	No	No
PM <sub>2.5</sub> (24 Hour)	None	35 µg/m <sup>3</sup>	2017	22.8	N/A	0/0
			2018	32.5	N/A	0/0
			2019	41.8	N/A	1/3.1
PM <sub>2.5</sub> (AAM)	12 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>	2017	9.7	No	No
			2018	10.3	No	No
			2019	8.7	No	No

O<sub>3</sub>: ozone; ppm: parts per million; µg/m<sup>3</sup>: micrograms per cubic meter; AAM: annual arithmetic mean; NO<sub>2</sub>: 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.

<sup>a</sup> California maximum levels were used.  
<sup>b</sup> For annual averaging times, a “Yes” or “No” response is given if the annual average concentration exceeded the applicable standard.  
<sup>c</sup> PM is measured once every 6 days. Where 2 values are shown for PM<sub>2.5</sub>, 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; 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 Environmental Assessment (EA).

### ***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<sub>3</sub> target of 80 parts per billion (ppb) by 2024, 75 ppb by 2032, 70 ppb by 2038;
- Annual PM<sub>2.5</sub> (12 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ]) by 2025;
- 1-hour O<sub>3</sub> (120 ppb) by 2023; and
- 24-hour PM<sub>2.5</sub> (35  $\mu\text{g}/\text{m}^3$ ) 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 Project may include, but are not limited to:

**SCAQMD Rule 201** requires a “Permit to Construct” prior to the installation of any equipment “the use of which may cause the issuance of air contaminants . . .” and Regulation II provides the requirements for the application for a Permit to Construct. Rule 203 similarly requires a Permit to Operate. Rule 219, Equipment not Requiring a Written Permit Pursuant to Regulation II, identifies “equipment, processes, or operations that emit small amounts of contaminants that shall not require written permits . . .”.

**SCAQMD Rule 402, Nuisance** states that a project shall not “discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”

**SCAQMD Rule 403, Fugitive Dust** requires actions to prevent, reduce, or mitigate fugitive particulate matter emissions. These actions include applying water or chemical stabilizers to disturbed soils; managing haul road dust by applying water; covering all haul vehicles before transporting materials; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); and sweeping loose dirt from paved site access roadways used by construction vehicles. In addition, Rule 403 requires that vegetative ground cover be established on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph.

**SCAQMD Rule 445** has been adopted to reduce the emissions of particulate matter from wood-burning devices and prohibits the installation of such devices in any new development.

**SCAQMD Rule 1113** governs the sale of architectural coatings and limits the VOC content in paints and paint solvents. Although this rule does not directly apply to the proposed Project, it does dictate the VOC content of paints available for use during building construction and ongoing maintenance.

**SCAQMD Rule 1401** under Regulation XIV requires new source review of any new, relocated, or modified permit units that emit TACs. The rule establishes allowable risks for units requiring permits pursuant to Rules 201 and 203, discussed above.

**SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities**, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

### ***Southern California Association of Governments (SCAG)***

SCAG is the regional planning agency for Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for regional issues relating to

transportation, the economy, community development, and the environment. SCAG serves as the federally designated MPO for the Southern California region. 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.

### **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 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**

<b>Mass Daily Thresholds<sup>a</sup></b>		
<b>Pollutant</b>	<b>Construction</b>	<b>Operation</b>
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
<b>TACs, Odor, and GHG Thresholds</b>		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk $\geq$ 10 in 1 million Cancer Burden $>$ 0.5 excess cancer cases (in areas $\geq$ 1 in 1 million) Chronic & Acute Hazard Index $\geq$ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO <sub>2</sub> e for industrial facilities	
<b>Ambient Air Quality Standards for Criteria Pollutants<sup>b, c</sup></b>		
NO <sub>2</sub>  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 $\mu\text{g}/\text{m}^3$ (construction) <sup>c</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM2.5 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) <sup>c</sup> & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO <sub>2</sub> 1-hour average 24-hour average	0.25 ppm (State) & 0.075 ppm (federal – 99 <sup>th</sup> percentile) 0.04 ppm (State)	
Sulfate 24-hour average	25 $\mu\text{g}/\text{m}^3$ (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 $\mu\text{g}/\text{m}^3$ (State) 0.15 $\mu\text{g}/\text{m}^3$ (federal)	
<p>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<sub>2</sub>e: metric tons per year of carbon dioxide equivalents, NO<sub>2</sub>: nitrogen dioxide, ppm: parts per million, <math>\mu\text{g}/\text{m}^3</math>: micrograms per cubic meter; South Coast AQMD: South Coast Air Quality Management District</p> <p><sup>a</sup> Source: South Coast AQMD CEQA Handbook (South Coast AQMD 1993)</p> <p><sup>b</sup> Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated</p> <p><sup>c</sup> Ambient air quality threshold is based on South Coast AQMD Rule 403</p> <p>Source: SCAQMD 2019</p>		

### 3.2.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

#### 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<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> 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 only future land uses have been identified and this EA does not address 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. Construction-related pollutant emissions would instead be quantified in future air quality analyses to be conducted for individual projects. 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, including one or more of the measures identified in MM AQ-1, based on project-specific air quality modeling. Even with incorporation of MM AQ-1, future construction of development projects have the potential to result in significant and unavoidable impacts.

##### ***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<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> 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. An LST analysis would be performed, if needed, for individual development projects, as required by MM AQ-1. 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, even with implementation of MM AQ-1. 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<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Operation-related emissions are expected from the following sources: area sources (architectural coatings, consumer products, hearths/fireplaces, landscape maintenance equipment), energy sources, mobile sources (vehicles), and stationary sources. The estimated operational-source regional (mass) emissions for the proposed Project are expected to exceed SCAQMD thresholds (see Table 3.2-4 above), particularly for VOCs and NO<sub>x</sub>.

This is because the primary source of VOCs would be consumer products and the primary sources for NO<sub>x</sub> would be fireplace combustion products and vehicle emissions. Therefore, operational emissions would be potentially significant. As required by MM AQ-1, the Applicant/Developer of future projects would provide a project-specific air quality analysis that includes 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, it cannot be established at this time that implementation of MM AQ-1 would reduce the significant impact to a less than significant level. As such, this would be a significant and unavoidable impact.

### **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).<sup>1</sup> 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”. There would be no impact related to CO hotspots.

Summarizing the above analyses, 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 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 3.2-5, 2040 Demographic Comparison Based on 2020–2045 RTP/SCS, 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 3.2-5  
2040 DEMOGRAPHIC COMPARISON BASED ON 2020–2045 RTP/SCS**

	2040 Population	2040 Households	2040 Employment
2020-2045 RTP/SCS	27,004	11,109	11,984
Project Buildout	32,462	13,245	15,678
<b>Difference</b>	<b>+5,458</b>	<b>+2,136</b>	<b>+3,694</b>
Sources: SCAG 2020, Aguilar 2021			

As shown in Table 3.2-5, 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 Project has the potential to conflict with the applicable 2020 AQMP because: 1) air 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.

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

<sup>1</sup> Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

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 EA. 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 PM<sub>10</sub>, PM<sub>2.5</sub>, and O<sub>3</sub>. The Project would contribute PM<sub>10</sub>, PM<sub>2.5</sub>, and O<sub>3</sub> precursors (i.e., VOC and NO<sub>x</sub>) 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 Project does not propose any specific development projects; therefore, construction-level analyses would be speculative. As such, implementation of the Project has the potential to result in significant direct impacts with respect to construction activity, even with implementation of MM AQ-1.

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 would be significant and unavoidable even with implementation of MM AQ-1.

As discussed above, the Project would be expected to exceed SCAQMD thresholds, particularly for VOC and NO<sub>x</sub>, which are O<sub>3</sub> 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 and NO<sub>x</sub> 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 3.2-6  
CALIFORNIA AIR RESOURCE BOARD ADVISORY RECOMMENDATIONS**

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	<ul style="list-style-type: none"> <li>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.</li> </ul>
Distribution Centers	<ul style="list-style-type: none"> <li>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).</li> <li>Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.</li> </ul>
Refineries	<ul style="list-style-type: none"> <li>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.</li> </ul>
Chrome Platers	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.</li> </ul>
Dry Cleaners Using Perchloroethylene	<ul style="list-style-type: none"> <li>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.</li> <li>Do not site new sensitive land uses in the same building with perc dry cleaning operations.</li> </ul>
Gasoline Dispensing Facilities	<ul style="list-style-type: none"> <li>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.</li> </ul>
<p>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</p>	

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.

With respect to 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 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 design to ensure the project achieves the incremental risk thresholds; and 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 TACs source. With implementation of MM AQ-2, there would be a less than 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**

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 Project would have the potential to be cumulatively significant. Implementation of MM AQ-1 would determine the impact of each project and potentially reduce impacts to less than significant. However, until individual projects are analyzed, 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 Project 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 Project 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-2 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-2, the Project-related potential for TAC exposure would be less than significant. Thus, the proposed Project 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 Project 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** To assess regional air pollutant emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific air quality analysis that includes mitigation measures, as needed, to reduce the any significant impacts to the maximum extent feasible. Applicants/Developers shall also assess the localized emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> from the construction of individual projects in proximity to sensitive receptors (e.g., residences, schools, hospitals), associated with the maximum daily construction activities for proposed individual developments.

If project-specific mitigation is required for regional and/or localized emissions due to exceedances of any SCAQMD threshold, mitigation measures must include one or more of the following, or include equally effective measures, as follows:

- For construction equipment greater than 150 horsepower (>150 HP), the Applicant/Developer shall require the construction contractor to use off-road diesel construction equipment that complies with minimum USEPA/CARB Tier 3 emissions standards during all construction phases. If the project-specific analysis indicates that Tier 3 off-road equipment would not reduce the impact to a less than significant level, off-road diesel equipment that complies with CARB Tier 4 (interim or final) emissions standards shall be used, as appropriate, or the best available emissions technology available at the time of project construction.



- The Applicant/Developer shall require the construction contractor to ensure that all construction equipment be tuned and maintained in accordance with the manufacturer's specifications.
- The Applicant/Developer shall require the construction contractor to use electricity to power on-site generators and other construction-related equipment and activities, if available and feasible, rather than using diesel-powered internal combustion engines.
- The Applicant/Developer shall require the construction contractor to maintain all construction equipment in good operation condition and ensure that all construction equipment is being properly serviced and maintained as per the manufacturer's specification. Maintenance records shall be available at the construction site for City verification.

#### **MM AQ-2**

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 Department of Planning and Building. 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/m<sup>3</sup>, PM2.5 concentrations exceed 2.5 µg/m<sup>3</sup>, 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.

#### **Construction Emissions (Regional and Local)**

Significant and unavoidable.

**Operational Emissions**

Significant and unavoidable.

**CO Hotspot**

Less than significant.

**Toxic Air Contaminants**

Less than significant.

**Odors**

No impact.

### 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). The Project would apply to the entire City of South Pasadena (City); however, the majority of projected growth is within the focus areas (in particular in the Ostrich Farm area and along Mission Street, Fair Oaks Avenue, and Huntington Drive), as described in Section 2.0, Environmental Setting and Project Description. 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.

This section concentrates on these areas of the City that would be most affected by the Project, 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 (*Zenaidura 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 maculatus*), 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.), 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 specially 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 (CNDDDB) (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 CNDDDB (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 CNDDDB 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 HOUSING ELEMENT GOALS AND POLICIES

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 Project 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.

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, some potential housing and development sites include 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 Project 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 Project 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 Project 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.

Future development pursuant to the Project 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. 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 be no conflict with any such provisions and no impact would occur with implementation of the Project. No mitigation is required.

### 3.3.7 CUMULATIVE IMPACTS

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 Project 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 Project 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. 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.

Because potentially significant impacts to biological resources resulting from future development pursuant to the Project would be less than significant with MMs BIO-1 through BIO-5, 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 all 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 three 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.

### 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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 A-1), Senate Bill (SB) 18 and Assembly Bill (AB) 52 outreach records regarding tribal cultural resources conducted by the City (Appendix A-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 20<sup>th</sup> 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 20<sup>th</sup> 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.<sup>1</sup> 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.

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<sup>1</sup> 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 20<sup>th</sup> 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 ballot 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<sup>2</sup> 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 Environmental Assessment (EA).

### ***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 individually designated, including individual resources that also fall within the boundaries of a designated historic district.

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<sup>2</sup> A volunteer non-profit organization that partners with governmental, volunteer, philanthropic, and educational organizations to pursue sustainability and beautification projects in the City.

**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 Chelton 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
913 Meridian Avenue	N/A	Meridian Iron Works	5	City
636 Mission Street	1928	Markey Building	31	City

**TABLE 3.4-1  
DESIGNATED INDIVIDUAL RESOURCES**

Address/Location	Year Built	Resource Name	Landmark Number	Status
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). <i>City of South Pasadena Citywide Historic Resources Survey</i> . Pasadena, CA: HRG. <a href="https://www.southpasadenaca.gov">636721709083330000 (southpasadenaca.gov)</a> .				

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, there are 236 contributing properties within South Pasadena’s ten historic districts.

## **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 Project site, as shown in Table 3.4-2, Cultural Resources Studies Within the Project Site.

**TABLE 3.4-2  
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE**

<b>Report No.</b>	<b>Year</b>	<b>Title</b>	<b>Author/Affiliation</b>
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

**TABLE 3.4-2  
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE**

Report No.	Year	Title	Author/Affiliation
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
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

**TABLE 3.4-2  
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE**

Report No.	Year	Title	Author/Affiliation
LA-09098	2006	Extended Phase I Testing for Cingular Wireless Facility Candidate 950-014 198e/Isanca0336 (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
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 Portada Street, South Pasadena, Los Angeles County, California 91030	Historic Resource Associates



**TABLE 3.4-2  
CULTURAL RESOURCES STUDIES WITHIN THE PROJECT SITE**

Report No.	Year	Title	Author/Affiliation
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 Project site, as shown in Table 3.4-3, Archeological and Historical Resources Near the Project Site.

**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)

**TABLE 3.4-3  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES  
WITHIN THE PROJECT SITE**

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
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)
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)

**TABLE 3.4-3  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES  
WITHIN THE PROJECT SITE**

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
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)
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)

**TABLE 3.4-3  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES  
WITHIN THE PROJECT SITE**

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
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 – William 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)
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)

**TABLE 3.4-3  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES  
WITHIN THE PROJECT SITE**

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
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)
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)

**TABLE 3.4-3  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES  
WITHIN THE PROJECT SITE**

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
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)
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)

**TABLE 3.4-3  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES  
WITHIN THE PROJECT SITE**

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
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)
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)

**TABLE 3.4-3  
ARCHAEOLOGICAL AND HISTORICAL RESOURCES  
WITHIN THE PROJECT SITE**

Primary No.	Age	Type	Resource Name	Recorded Date (Author)
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)
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 and 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 (*Protothaca 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 HOUSING ELEMENT GOALS AND POLICIES

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 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. 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 importance of integrating new development with the historic character of neighboring historic buildings and districts; and preserving, enhancing, and building on existing downtown assets to harness the power of place-making in the Downtown area are integral to the City's approach. 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 City's approach would facilitate the prevention of substantial alterations to historical resources. This includes developing 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.

The City intends to establish an updated inventory, in the future, to clarify which properties are considered to be resources. 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. 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 Project 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 housing 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 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 and the projected growth is limited, 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 Project 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, the subject of 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. 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 Project 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 Project 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 Project 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 Project 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; these were the tribes identified by the City as having requested notification.

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 Project 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 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 Planning and Building 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 Planning and Building 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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 Environmental Assessment (EA). 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 2019 Standards, effective January 1, 2020. Analysis by the California Energy Commission concludes that the 2019 energy efficiency standards are projected to result in a 30 percent improvement in energy efficiency for nonresidential buildings over the 2016 standards. The 2019 standards require photovoltaic solar systems on newly constructed single-family residences and on newly constructed multi-family residential structures of three stories or less. Single-family homes built to the 2019 standards will be about 7 percent more efficient than homes built to the 2016 standards; and about 53 percent more efficient after factoring in the required solar systems (CEC 2020).

The 2019 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 required 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 2019 annual report, most retail sellers procured at or above the 29 percent RPS annual target for 2018; and the large investor-owned utilities have executed renewable electricity contracts needed to meet the 2020 RPS requirement of 33 percent (CPUC 2020). Since 2003, the three large investor-owned utilities have contracted for over 21,000 megawatts (MW) of renewable energy capacity (CPUC 2020). 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 (CEC 2020).

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. It is estimated that by the year 2040, 57 percent of all passenger vehicle sales will be battery electric vehicles (BNEF 2020). 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.

**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: <ul style="list-style-type: none"> <li>• Monitoring opt-out rates on an annual basis</li> <li>• Tabling at community events</li> <li>• Establishing an informational resource page on the City website</li> <li>• Regular social media posts</li> <li>• Energy bill inserts</li> </ul>
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.

**TABLE 3.5-1  
SOUTH PASADENA CLIMATE ACTION PLAN ENERGY SECTOR  
MEASURES (PLAYS) AND ACTIONS (MOVES)**

Measures (Plays)	Actions (Moves)
	<p>E.2.d Provide education around cooking with electric appliances, including demonstrations from chefs and/or local restaurants, as available.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Conduct a cost effectiveness study</li> <li>• Develop and draft an ordinance</li> <li>• Conduct public hearings, public notices, and formally adopt the ordinance</li> <li>• Submit the adopted ordinance to the California Energy Commission (CEC)</li> </ul> <p>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.</p>
<p>E.3 Electrify 5% of existing buildings by 2030 and 80% by 2045.</p>	<p>E.3.a Develop an existing building electrification permit tracking program to track annual progress in achieving the targeted electrification goal.</p> <p>E.3.b Keep an updated list of rebates and incentives available to residents who would like to convert their buildings to electric power.</p> <p>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.</p> <p>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.</p> <p>E.3.e Promote water heater, space heating, and appliance (electric stoves/dryers) replacement programs and incentives (residential) at time of construction permit.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

**TABLE 3.5-1  
SOUTH PASADENA CLIMATE ACTION PLAN ENERGY SECTOR  
MEASURES (PLAYS) AND ACTIONS (MOVES)**

Measures (Plays)	Actions (Moves)
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	

**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 from Southern California Edison (SCE) 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.

### 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 HOUSING ELEMENT GOALS AND POLICIES

#### 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

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

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 L 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.

There would be reduced vehicle miles traveled (VMT) per capita and 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 efficiency 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.

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 Project.

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 Project 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 3.5-1, above, presents the measures and actions from the City’s adopted CAP. 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**

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 the Project. Therefore, no mitigation is required.

**3.5.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Less than significant.

### 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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 B), 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). 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.

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.				

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 ( <i>Ganolytes</i> ), perch-like fish ( <i>Thyrsoctes</i> ), ray-finned fish ( <i>Etringus</i> ), and other unspecified	Unknown
LACM VO CIT342	Sparkletts property near 45 <sup>th</sup> and Lincoln in Highland Park	Unknown formation (Pleistocene)	Mammoth ( <i>Mammuthus</i> ), Bison ( <i>Bison</i> )	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 ( <i>Mysticeti</i> )	found in hillslope rubble
LACM VP 7507	Near the intersection of San Fernando Road and Humbolt Street	Monterey Formation	Perch-like fish ( <i>Thyrsoctes kriegeri</i> )	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 ( <i>Smilodon</i> ), horse ( <i>Equus</i> ), deer ( <i>Odocoileus</i> ), Turkey ( <i>Meleagris</i> )	Unknown (excavations for storm drains)
LACM VP 2032	Los Angeles Brickyard Mission Road and Daly Street	Unknown Formation (Pleistocene, silt & clay)	Mastodon ( <i>Mammut</i> )	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 2019 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 because 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 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 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 waste water disposal systems where sewers are not available for the disposal of waste water.
- Threshold 3.6f:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

### 3.6.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element 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 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. 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 Project 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.

Development in the City and in the hillside areas is subject to regulations related to grading and geotechnical study. The City also has a continuing 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 requirements 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. 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.<sup>1</sup> 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 the City Building Code. Through compliance with existing regulations related to secondary seismic hazards, there would be less than significant impacts related to ground failure, 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 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

<sup>1</sup> Pore water is the water existing in the pores or spaces between grains in sedimentary materials.

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 Project 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. 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 Project 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 waste water disposal systems where sewers are not available for the disposal of waste water?**

Most 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 Project would use septic tanks or alternative wastewater disposal systems. There would be no impact, and no mitigation is required.

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**Threshold 3.6f: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

The proposed Project 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 Project. 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**

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 in the City, 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 Project 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 Project 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, 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.

### 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project) and their relationship to climate change.

### 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).<sup>1</sup> 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<sub>2</sub>), 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).

#### ***Greenhouse Gases***

GHGs are global pollutants and are therefore unlike criteria air pollutants such as ozone (O<sub>3</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and toxic air contaminants (TACs), which are pollutants of regional and local concern. 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<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). 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<sub>2</sub>. For example, as CH<sub>4</sub> and N<sub>2</sub>O are approximately 25 and 298 times (respectively) more powerful than CO<sub>2</sub> in their ability to trap heat in the atmosphere, they have GWPs of 25 and 298, respectively (CO<sub>2</sub> has a GWP of 1). Carbon

<sup>1</sup> 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).

dioxide equivalent (CO<sub>2</sub>e) 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<sub>2</sub>e.

### **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. If global background O<sub>3</sub> levels increase as predicted under some scenarios, it may become impossible to meet local air quality standards. 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<sub>2</sub> 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<sub>3</sub> 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 and State scales. It shows the relative estimated quantities of GHG emissions from worldwide to California. CO<sub>2</sub>e emissions are commonly expressed as metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e). Larger quantities of emissions, such as on the State or world scale, are expressed as million metric tons of carbon dioxide equivalent (MMTCO<sub>2</sub>e). 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 <sub>2</sub> e)
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 <sub>2</sub> e: 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<sub>2</sub>, 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<sub>2</sub> 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 reconsideration was also filed by several environmental 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 closes 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 to begin rule development for 2026 and subsequent model years (CARB 2021d).

### ***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<sub>2e</sub> to

the 1990 emissions level of 431 MMTCO<sub>2e</sub> will require a reduction of 78 MMTCO<sub>2e</sub>, 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 Draft 2022 Scoping Plan Update, dated May 2022, assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State’s long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities (CARB 2022b). This is the first Scoping Plan that adds carbon neutrality as a science-based guide beyond statutorily established emission reduction targets. It identifies a technologically feasible, cost-effective and equity-focused path to achieve carbon neutrality by 2045, or earlier, while also assessing the progress the state is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan (CARB 2022c).

### **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 (SCAG 2016). See additional discussion of the SCAG plan under “Regional” regulations below.

### **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 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 currently applicable standards are the 2019 Standards, effective January 1, 2020. The 2019 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 nonresidential 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 onsite electricity generation is consistent with the goal to develop renewable sources of energy.

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”. Additionally, it has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. In 2013, the California Energy Commission (CEC), in coordination with the CPUC, commenced a process to update the Title 24 energy efficiency standards and, the 2016 Title 24 Energy Efficiency Standards establish building design and construction requirements that move closer to achieving California’s ZNE goals. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas use and electricity generation result in GHG emissions.

### ***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). 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 CO<sub>2</sub> equivalent per year (MTCO<sub>2</sub>e/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 MTCO<sub>2</sub>e/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<sup>2</sup>, 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 3,000 MTCO<sub>2</sub>e 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 MTCO<sub>2</sub>e per year per service population (SP) for project-level thresholds where SP is project residents plus employees and 6.6 MTCO<sub>2</sub>e per year per SP for a plan-level threshold (SCAQMD 2010). Targets for 2035 are 3.0 MTCO<sub>2</sub>e per SP for project level thresholds and 4.1 MTCO<sub>2</sub>e 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 EA, 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 but the methodology has been used by lead agencies to evaluate GHG impacts under CEQA.

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<sup>2</sup> 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.

## **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).<sup>3</sup> 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.”

The CAP targets are to reduce the City's GHG emissions from a level of approximately 125,269 MTCO<sub>2</sub>e/year in 2016, when the CAP was prepared, to approximately 75,000 MTCO<sub>2</sub>e/year in 2030, 25,000 MTCO<sub>2</sub>e/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 shown in Table 3.7-2.

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<sup>3</sup> The 2020-2045 RTP/SCS succeeds the 2016-2040 RTP/SCS.

**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 <sub>2</sub> e 2045: 78 MT CO <sub>2</sub> e
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 <sub>2</sub> e 2045: 0 MT CO <sub>2</sub> e
	E.2	Electrify 100% of newly constructed buildings.	2030: 228 MT CO <sub>2</sub> e 2045: 935 MT CO <sub>2</sub> e
	E.3	Electrify 5% of existing buildings by 2030 and 80% by 2045.	2030: 1,184 MT CO <sub>2</sub> e 2045: 19,355 MT CO <sub>2</sub> e
	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 <sub>2</sub> e 2045: 6,629 MT CO <sub>2</sub> e
	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 <sub>2</sub> e 2045: 1,399 MT CO <sub>2</sub> e
	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 <sub>2</sub> e 2045: 2,015 MT CO <sub>2</sub> e
Water and Wastewater <sup>1</sup>	W.1	Reduce per capita water consumption by 10% by 2030 and 35% by 2045.	2030: 414 MT CO <sub>2</sub> e 2045: 0 MT CO <sub>2</sub> e
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 <sub>2</sub> e 2045: 1,764 MT CO <sub>2</sub> e
	SW.2	Reduce residential and commercial waste sent to landfills by 50% by 2030 and 100% by 2045.	2030: 415 MT CO <sub>2</sub> e 2045: 859 MT CO <sub>2</sub> e
Carbon Sequestration	CS.1	Increase carbon sequestration through increased tree planting and green space.	2030: 19 MT CO <sub>2</sub> e 2045: 39 MT CO <sub>2</sub> e
Municipal	M.1	Reduce carbon intensity of City operations.	2030: 188 MT CO <sub>2</sub> e 2045: 188 MT CO <sub>2</sub> e
	M.2	Electrify the municipal vehicle fleet and mobile equipment.	2030: 23 MT CO <sub>2</sub> e 2045: 23 MT CO <sub>2</sub> e
	M.3	Increase City's renewable energy production and energy resilience.	Supportive of 2030 and 2045 Goals
<b>Totals</b>			<b>2030: 22,959 MT CO<sub>2</sub>e 2045: 33,284 MT CO<sub>2</sub>e</b>
<p>"Note: South Pasadena would be required to reduce 18,578 MT CO<sub>2</sub>e by 2030, 53,874 MT CO<sub>2</sub>e by 2040, and 73,969 MT CO<sub>2</sub>e by 2045 to meet the City's targets and state goals.</p> <p><sup>1</sup> 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."</p> <p>Source: South Pasadena 2020</p>			

### **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 MTCO<sub>2</sub>e/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<sub>2</sub>e 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 MTCO<sub>2</sub>e/SP/yr and the 2045 target of 0 MTCO<sub>2</sub>e/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 HOUSING ELEMENT GOALS AND POLICIES

#### 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-related GHG emissions have been excluded from this GHG analysis. As the proposed Project only 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. 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.

Operational emissions associated with buildout of the Project. would result in emissions of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O from area sources (hearths/fireplaces, landscape maintenance equipment); energy sources, mobile sources (vehicles), solid waste, water usage, and stationary sources.

### ***Estimated Emissions***

As a conservative estimate, GHG emissions are expected to exceed both guidance thresholds (see Section 3.7.4, Thresholds of Significance, above). Regardless, at the program level, GHG emissions must be considered potentially significant, and the Project may generate GHG emissions that would have a significant impact on the environment. Therefore, mitigation measure (MM) GHG-1 requires project-level GHG analysis, and appropriate mitigation actions shall be implemented. Because the effects of MM GHG-1 cannot be quantified at this time, impact would remain significant and unavoidable.

### **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.

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 is therefore consistent with State plans, policies and regulations adopted for the purpose of reducing emissions of GHGs.

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 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. The impact would be less than significant, and no mitigation is required.

### 3.7.7 CUMULATIVE IMPACTS

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, there would be a significant and unavoidable impact even with implementation of MM GHG-1.

### 3.7.8 MITIGATION MEASURES

**MM GHG-1** To assess GHG emissions from the construction of individual projects, the Applicant/Developer of future development projects shall provide a project-specific GHG emissions analysis that includes mitigation measures, as needed, to reduce any significant impacts to the maximum extent feasible.

Alternatively, the Applicant/Developer of future development projects shall demonstrate that the proposed Project is consistent with the South Pasadena 2020 Final Climate Action Plan. If consistency is demonstrated, the Project would have a less than significant GHG Emissions impact.

### 3.7.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Significant and unavoidable.

### 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). Information in this section was derived from the California Environmental Protection Agency (CalEPA), California Department of Forestry and Fire Protection, and City websites.

### 3.8.2 **EXISTING CONDITIONS**

#### **Hazardous Materials**

Hazardous materials<sup>1</sup> 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 2021c), 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).

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<sup>1</sup> 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 2016 (USEPA 2016).

##### ***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<sup>2</sup> regarding how and where to properly dispose of many categories of materials, including HHW, less hazardous products, and used motor oil.

## **City**

### ***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.”

#### **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;

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<sup>2</sup> <https://www.southpasadenaca.gov/government/departments/public-works/environmental-programs/waste-reduction/hazardous-waste>.

**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 HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element 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 Project, 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 Project 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 Project 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<sup>3</sup>.

<sup>3</sup> 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".

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 Project.

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.

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 2022). 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 El Monte 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 Project 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.

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 Project 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**

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 Planning and Building 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.

### 3.8.10 REFERENCES

California Department of Toxic Substances Control (DTSC). 2023 (April 25, access date). *EnviroStor Database*. Sacramento, CA: DTSC. <https://dtsc.ca.gov/dtscs-cortese-list/>.

California Environmental Protection Agency (CalEPA). 2023a (April 25, access date). *Cortese List Data Resources*. Sacramento, CA: CalEPA. <https://calepa.ca.gov/sitecleanup/corteselist/>.

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California Department of Forestry and Fire Protection (CAL FIRE). 2023. (April 25, last accessed) FHSZ Viewer. Sacramento, CA: CAL FIRE. <https://egis.fire.ca.gov/FHSZ/>.

California Water Resources Control Board (SWRCB). 2023 (April 25, access date). *Geotracker Database*. Sacramento, CA: SWRCB. <https://geotracker.waterboards.ca.gov/search>.

United States Environmental Protection Agency (USEPA). 2016. *Toxics Release Inventory (TRI) Program, TRI Basic Data Files: Calendar Years 1987–2016: 2016 data for California*. Washington, D.C.: USEPA. <https://www.epa.gov/toxics-release-inventory-tri-program/tri-basic-data-files-calendar-years-1987-2016>.

## **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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). Information presented in this section was derived from the City’s website, 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<sup>1</sup> 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). 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, with the exception of 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 Basin, Lower San Gabriel Canyon Basin, Glendora Basin, Foothill Basin, Way Hill Basin, and

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<sup>1</sup> 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.

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).

## **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 is 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. Wilson Well No. 2 is inactive as of June 2018, 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 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. Therefore, the capacity of the facility to accommodate future storm water flows and sediment has been restored.

### **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 HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element 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 Project 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 Project 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.

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 Project 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 Project 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 Project would result in a minimal increase in impervious surfaces. The vacant parcels available for development 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 Project 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 Project 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 Project, 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 in Section 3.5, Geology and Soils, of this EA, 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 Project 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 Project 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**

#### **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 and personal injury 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. 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 . Therefore, no mitigation is required.

### **3.9.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Less than significant.

### **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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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 Environmental Assessment (EA) 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 EA.

### **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 EA.

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 Gold 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<sup>1</sup> within its submarket, which is primarily located in the Ostrich Farm District (HR&A 2017).

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<sup>1</sup> 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 encourage creativity and collaboration. Often utilized by creative/design businesses, such as architecture, advertising, and production.

### 3.10.3 RELEVANT PROGRAMS AND REGULATIONS

#### **State**

##### ***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 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. 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<sup>2</sup> 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 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

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<sup>2</sup> *Settlement Agreement (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161)*

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 6<sup>th</sup> 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 5<sup>th</sup> 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 6<sup>th</sup> Cycle RHNA allocation. Additionally, the housing units allocated for the City in the 5<sup>th</sup> 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 5<sup>th</sup> 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 Newsom 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 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 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 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. The one-half mile radius area around Metro's L (formerly Gold) Line Station at the Mission Street and Meridian Avenue intersection and Fair Oaks Avenue through the City are identified as a HQTAs.

### 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 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 Housing and Community Development (HCD) has required the 2021–2029 Housing Element 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 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; 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 EA.

## **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 last 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). 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 for the 2013–2021 period);
- 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, Existing Land Use Policy Map, presented in Section 2.0 of this EA, depicts the current land use plan for the City.

### ***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.

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 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.

### **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 HOUSING ELEMENT GOALS AND POLICIES**

#### **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.

### **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 Project is preservation of existing neighborhoods and directing calibrated growth. . The 2021–2029 Housing Element identifies 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 be no 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 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 a community. 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 Project would not result in division of any existing, established communities. There would be less than 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 2021–2029 Housing Element 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 is 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 identifies 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 has 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 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, the documents would be internally consistent. There would be no impact, and no mitigation is required.

### **Consistency with SCAG 2020–2045 RTP/SCS**

Table 3.10-1, 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 2021–2029 Housing Element 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 3.10-1  
SCAG 2020-2045 RTP/SCS CONSISTENCY ANALYSIS**

RTP/SCS Plan Goals	Consistency Analysis
<b>Goal 1:</b> Encourage regional economic prosperity and global competitiveness.	<b>Consistent:</b> Encouraging regional economic development and competitiveness is not the purview of the City, but SCAG. However, providing affordable and quality housing, amenities, and services that make South Pasadena a desirable place for employees to work and live is a goal of the City.
<b>Goal 2:</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>Consistent:</b> The transportation network in the City is well established; however, some improvements to the network could occur with implementation of the Project.  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 along major thoroughfares and promotes pedestrian-oriented mixed-use development to reduce vehicle use.
<b>Goal 3:</b> Enhance the preservation, security, and resilience of the regional transportation system.	<b>Consistent:</b> 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.
<b>Goal 4:</b> Increase person and goods movement and travel choices within the transportation system.	<b>Consistent:</b> The local transportation system would continue to be improved and/or maintained to maximize circulation productivity with convenient accessibility to multiple travel modes within the City (pedestrian, bike, rail, bus, and auto).
<b>Goal 5:</b> Reduce greenhouse gas emissions and improve air quality.	<b>Consistent:</b> The reduction of greenhouse gas (GHG) emissions and improvement of air quality would be encouraged through the development of green design techniques for buildings and other energy-reducing techniques.  The expansion of the mixed-use development capacity in the in the City 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.
<b>Goal 6:</b> Support healthy and equitable communities.	<b>Consistent:</b> 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.
<b>Goal 7:</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.	<b>Consistent:</b> As discussed for Goal 4, the expansion of the mixed-use development capacity in the in the City 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

**TABLE 3.10-1  
SCAG 2020-2045 RTP/SCS CONSISTENCY ANALYSIS**

RTP/SCS Plan Goals	Consistency Analysis
	and integrates into the regional development pattern proposed by SCAG.
<b>Goal 8:</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	<b>Consistent:</b> As transportation-related technologies develop that would be applicable at the scale of an individual city, the City Public Works Department would leverage these technologies where economically feasible.
<b>Goal 9:</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.	<b>Consistent:</b> 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.
<b>Goal 10:</b> Promote conservation of natural and agricultural lands and restoration of habitats.	<b>Consistent:</b> 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.

As shown in Table 3.10-1, the proposed 2021–2029 Housing Element is consistent with SCAG’s 10 goals for 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 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 2021–2029 Housing Element, some portion of the City’s Zoning Code would no longer be consistent with the goals, policies, and actions of the existing General Plan. If the 2021–2029 Housing Element is 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.

Therefore, with the planned review and update of the Zoning Code, , subsequent to adoption of the 2021–2029 Housing Element, there would be no conflict between the City’s Zoning Code regulations and the Project. There would be no impact, and no mitigation is required.

### **Land Use Compatibility**

Future development pursuant to the proposed Project has been considered during the planning process to create a balance among land uses and promote land use compatibility within the City. Except for the Huntington Drive/Garfield Avenue and Huntington Drive/Fletcher Avenue intersections and some of the proposed housing sites, there would be no 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 Project. The compatibility of

proposed land uses in the two focus areas with boundaries along adjacent municipalities are discussed below:

- **Huntington Drive and Garfield Avenue:** 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 on 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:** 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 2010). 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 is one vacant parcel identified in the northeastern corner and several parcels, both vacant and developed, identified along the western and southwestern boundaries of the City as potential housing sites. The parcel in the northeastern corner abuts the City of Pasadena where public facilities (Pasadena Water and Power and Blair Middle School and High School campuses) are present. Development of housing on this parcel would be consistent with the existing residential land uses located to the south and west within the City. 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. 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.

As discussed above, the proposed Project 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

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 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 (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 Project 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 Project. If discretionary actions are needed, individual projects would be subject to evaluation for potential environmental impacts as 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 Project. Therefore, no mitigation is required.

### **3.10.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Less than significant.

### 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project). 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.

#### ***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 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. The 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.

### **3.11.2 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.

### South Pasadena and Land Use Compatibility

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 3.11-1, South Pasadena Municipal Code Operational Noise Standards, summarizes the exterior noise level standards.

**TABLE 3.11-1  
SOUTH PASADENA MUNICIPAL CODE OPERATIONAL NOISE STANDARDS**

SMPC Section <sup>1</sup>	Title	Exterior Noise Level Standard (dBA) <sup>2</sup>
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		
<sup>1</sup> South Pasadena Municipal Code, Chapter 19A Noise Regulation		
<sup>2</sup> These standards apply at the property line of the adjacent use.		
Source: South Pasadena Municipal Code		

### **Construction Noise Standards**

Noise from construction activities are 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”. The FTA *Transit Noise and Vibration Impact Assessment* identifies detailed assessment criteria including an eight-hour construction noise level threshold of 80 dBA L<sub>eq</sub> during daytime at residential (noise-sensitive) uses, and 85 dBA L<sub>eq</sub> 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 L 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 L 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 most applicable to the Project. The Project is not expected to include any specific type of operational vibration sources.

### **3.11.3 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.

### **Significance Criteria Summary**

The following summarizes the thresholds considered most applicable to the Project. Noise impacts shall be considered significant if any of the thresholds shown in Table 3.11-2, Significance Criteria Summary, occurs as a direct result of the construction or operation of future land uses pursuant to the Project.

**TABLE 3.11-2  
SIGNIFICANCE CRITERIA SUMMARY**

Analysis	Receiving Land Use	Condition(s)	Significance Criteria
Traffic (Off-Site/ Existing Uses) <sup>1</sup>	Noise-Sensitive	Exterior Noise Level Standard	65 dBA CNEL
		Long-Term Noise Level Increase	≥ 3 dBA CNEL Project increase
Traffic (On-Site/ Proposed Uses) <sup>2</sup>	Residential	Exterior Noise Level Standard	65 dBA CNEL
		Interior Noise Level Standard	45 dBA CNEL
	Non-Residential	On-Site Vibration Level Threshold <sup>3</sup>	72 VdB
			75 VdB
Operational	All <sup>4</sup>	Exterior Noise Level Standard	Ambient + 5 dBA
		Amplified Sound	Ambient + 15 dBA
	Noise-Sensitive	Vibration Level Threshold <sup>5</sup>	0.01 in/sec RMS
Construction	Noise-Sensitive	Residential Noise Level Threshold <sup>3</sup>	80 dBA L <sub>eq</sub> (8-Hour)
		Commercial Noise Level Threshold <sup>3</sup>	85 dBA L <sub>eq</sub> (8-Hour)
		Vibration Level Threshold <sup>5</sup>	0.01 in/sec RMS

Sources:  
<sup>1</sup> City of South Pasadena General Plan Safety and Noise Element, Policy 5.1.  
<sup>2</sup> City of South Pasadena General Plan Safety & Noise Element, Policy 5.1 & Strategy 5.5.  
<sup>3</sup> Federal Transportation Authority, Transit Noise and Vibration Impact Assessment.  
<sup>4</sup> City of South Pasadena Municipal Code, Sections 19A.7(b), 19A.12, and 19.21(c) (Appendix 3.1).  
<sup>5</sup> Los Angeles County Code, Section 12.08.350

### 3.11.4 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to noise.

### 3.11.5 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. Table 3.11-3, Construction Reference Noise Levels, 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).

**TABLE 3.11-3  
CONSTRUCTION REFERENCE NOISE LEVELS**

Noise Source	Reference Distance From Source (Feet)	Reference Noise Levels (dBA L <sub>eq</sub> )	
		@ Reference Distance	@ 50 feet <sup>8</sup>
Truck Pass-Bys & Dozer Activity <sup>1</sup>	30	63.6	59.2
Dozer Activity <sup>1</sup>	30	68.6	64.2
Construction Vehicle Maintenance Activities <sup>2</sup>	30	71.9	67.5
Foundation Trenching <sup>2</sup>	30	72.6	68.2
Rough Grading Activities <sup>2</sup>	30	77.9	73.5
Framing <sup>3</sup>	30	66.7	62.3
Water Truck Pass-By & Backup Alarm <sup>4</sup>	30	76.3	71.9
Dozer Pass-By <sup>4</sup>	30	84.0	79.6
Two Scrapers & Water Truck Pass-By <sup>4</sup>	30	83.4	79.0
Two Scrapers Pass-By <sup>4</sup>	30	83.7	79.3
Scraper, Water Truck, & Dozer Activity <sup>4</sup>	30	79.7	75.3
Concrete Mixer Truck Movements <sup>5</sup>	50	71.2	71.2
Concrete Paver Activities <sup>5</sup>	30	70.0	65.6
Concrete Mixer Pour & Paving Activities <sup>5</sup>	30	70.3	65.9
Concrete Mixer Backup Alarms & Air Brakes <sup>5</sup>	50	71.6	71.6
Concrete Mixer Pour Activities <sup>5</sup>	50	67.7	67.7
Forklift, Jackhammer, & Metal Truck Bed Loading <sup>6</sup>	50	67.9	67.9
Pile Driver (Impact) <sup>7</sup>	50	94.0	94.0
Sources:			
<sup>1</sup> 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.			
<sup>2</sup> As measured by Urban Crossroads, Inc. on 10/20/15 at a construction site located in Rancho Mission Viejo.			
<sup>3</sup> As measured by Urban Crossroads, Inc. on 10/20/15 at a residential construction site located in Rancho Mission Viejo.			
<sup>4</sup> As measured by Urban Crossroads, Inc. on 10/30/15 during grading operations within an industrial construction site located in the City of Ontario.			
<sup>5</sup> 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.			
<sup>6</sup> As measured by Urban Crossroads, Inc. on 9/9/16 during the demolition of an existing parking lot at 41 Corporate Park in Irvine.			
<sup>7</sup> Source: FHWA Roadway Construction Noise Model, January 2006.			
<sup>8</sup> Reference noise levels are calculated at 50 feet using a drop off rate of 6 dBA per doubling of distance (point source).			

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<sub>eq</sub> 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<sub>eq</sub> at 50 feet and is used in this analysis to determine potential impacts for future development that could require this construction method. Based on the reference construction noise levels, the estimated highest noise level generated by unmitigated typical



construction activity and pile driving activity would be expected to range from approximately 80 dBA  $L_{eq}$  at 50 feet and approximately 94 dBA  $L_{eq}$  at 50 feet, respectively.

The highest reference construction noise level of approximately 80 dBA  $L_{eq}$  at 50 feet for construction activity, not including pile driving, 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.

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, 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***

Noise contours represent the distance to noise levels of a constant value 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 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.

The Project traffic noise levels at adjacent land uses are estimated to range from approximately 63 to 76 dBA CNEL. Although there would be additional traffic generated from the Project, because of the logarithmic nature of sound it requires a doubling or a halving of traffic levels to generate an audible (about 3 dBA) difference in noise levels. Also, as the Project would result generally in denser land uses, especially along arterial thoroughfares and near transit, vehicle miles traveled (VMT) per capita would decrease. As such, Project-generated noise level increases from traffic at existing adjacent receptors would not likely be perceptible to human hearing. Based on the significance criteria for off-site noise impacts), the Project-related increases in noise levels at the nearest sensitive receptors due to traffic noise alone represent a less than significant impact under the future (2040) with Project scenario, and no mitigation is required.

However, the worst-case exterior traffic noise level ranges for proposed residential uses in future development in some growth areas.

**TABLE 3.11-4  
FUTURE (2040) WITH PROJECT TRAFFIC NOISE LEVELS BY FOCUS AREA**

Focus Area	Future CNEL (Worst-Case Transportation Noise Levels)
<b>Corridors (Downtown Specific Plan)</b>	
Mission Street and Fair Oaks Avenue	65 to 75
<b>Districts</b>	
Ostrich Farm	70 to 80
<b>Neighborhood Centers</b>	
Huntington Drive & Garfield Avenue	<70 to 75>
Huntington Drive & Fremont Avenue	<70 to 75>
Huntington Drive & Fletcher Avenue	65 to 75
Source: Psomas 2021, modeling inputs and results for this scenario are presented in Appendix E-2	

The proposed residential uses would be expected to be 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 L Line, the on-site transportation-related noise impacts at future uses within some growth areas 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 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 assemblies 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. 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. 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 3.11-5, Vibration Source Levels for Construction Equipment, which is based on the reference vibration levels provided by the FTA.

**TABLE 3.11-5  
VIBRATION SOURCE LEVELS FOR  
CONSTRUCTION EQUIPMENT**

<b>Equipment</b>	<b>PPV (in/sec) at 25 feet</b>
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Source: FTA 2007.	

Based on the reference vibration levels provided by the FTA, a large bulldozer represents the highest source of typical construction-related 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.

Compared with the County of Los Angeles construction vibration standard of 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 L Line rail activities are 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"*.

However, some residential and non-residential uses within the focus areas are anticipated to be located within 50 feet of the Metro L 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 Gold 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 El Monte 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.

### **3.11.6 CUMULATIVE IMPACTS**

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 Project includes cumulative traffic volumes in the region by 2040. Thus, noise impacts associated with the Project account for cumulative noise impacts.

The Project-only traffic noise levels would not exceed a 3 dBA threshold and therefore would not be audible to human hearing. 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 be expected to result in on-site exterior noise levels that would exceed the standard of 65 dBA CNEL at future development in the focus areas. 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 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 L Line and construction activity would be limited geographically to the alignment of the L 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.

### **3.11.7 MITIGATION MEASURES**

**NOI-1** Prior to the issuance of a building permit for new 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 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 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 extremely fragile historic building, as defined by the South Pasadena Historic Resources Survey, 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 Planning and Building 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 L Line, the Project Applicant/Developer shall submit a final vibration study to the City of South Pasadena Planning and Building 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.

### **3.11.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

#### **Construction Noise Levels**

Significant Unavoidable Impact with Mitigation

#### **Construction and Operational Vibration Levels**

Less Than Significant Impact with Mitigation

#### **On-Site Stationary Source Noise**

Less Than Significant Impact with Mitigation

#### **Exterior Traffic Noise**

Significant Unavoidable Impact with Mitigation

#### **Interior Traffic and Stationary Source Noise**

Less Than Significant Impact with Mitigation

#### **Airport and Airstrip Noise**

No Impact



## **Cumulative Impacts**

Significant Unavoidable Impact with Mitigation

### 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 proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project)ss. 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.

#### 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 2021 based on the most recent 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, 1990–2021**

Year	South Pasadena		Los Angeles County	
	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**

Year	South Pasadena		Los Angeles County	
	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, 2000–2021**

Year	South Pasadena		Los Angeles County	
	Jobs	Percent Change	Jobs	Percent Change
2000	14,857 <sup>a</sup>	—	4,413,200 <sup>c</sup>	—
2010	13,128 <sup>a</sup>	-13.2%	4,318,700 <sup>c</sup>	-2.2%
2022	13,700 <sup>b</sup>	+4.4%	4,703,800 <sup>b</sup>	+8.9%

Sources:  
<sup>a</sup> BLS 2018  
<sup>b</sup> EDD 2022  
<sup>c</sup> 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 6<sup>th</sup> 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 in this Environmental Assessment (EA). 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 EA 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
<b>South Pasadena</b>			
Households (DUs) <sup>a</sup>	10,431	10,517	11,109
Housing Units	11,038	11,129	11,756
Employment <sup>a</sup>	11,411	11,528	11,984
Jobs/Housing Ratio	1.03	1.04	1.02
<b>Los Angeles County</b>			
Households (DUs) <sup>a</sup>	3,318,988	3,471,759	4,002,104
Housing Units	3,545,927	3,709,144	4,275,752
Employment <sup>a</sup>	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 EA. 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 Newsom 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). 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<sup>1</sup> 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 6<sup>th</sup> Cycle Housing Element planning period (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 5<sup>th</sup> Cycle Housing Element (2013–2021) that were not accommodated.

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<sup>1</sup> *Settlement Agreement (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161)*

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 6<sup>th</sup> Cycle RHNA allocation. Additionally, the housing units allocated for the City in the 5<sup>th</sup> 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 5<sup>th</sup> 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 Newsom 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 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 one - three "incentives" and "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. 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 (6<sup>th</sup> 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 update balances 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 6<sup>th</sup> Cycle RHNA, approved by HCD on March 22, 2021, the City's proposed 2021–2029 Housing Element 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 required the 2021–2029 Housing Element 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 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; 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 last 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). 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 for the 2013–2021 period);
- 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 EA, 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 HOUSING ELEMENT GOALS AND POLICIES**

#### **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 Housing Rights Center.

**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 on the City’s website.

**Policy 5.2** Coordinate with the Housing Rights Center 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 Housing Rights Center 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.

**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.

### **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 EA, 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 EA 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<sup>2</sup> and 1,978 jobs<sup>3</sup> in the City through 2040 compared to existing conditions. The maximum of 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

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<sup>2</sup> Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

<sup>3</sup> Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).

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 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 the Project.

**TABLE 3.12-6  
COMPARISON OF EXISTING AND PROJECTED CONDITIONS**

	Existing Conditions	Project Buildout (2040)	Growth	Difference
Households (DUs)	10,623 <sup>a</sup>	13,245	2,622	+25.0%
Housing Units (DUs)	11,156 <sup>a</sup>	13,931	2,775	+25.0%
Population (residents)	25,580 <sup>a</sup>	32,083	6,503	+25.4%
Non-residential (sf)	1,256,000 <sup>b</sup>	1,686,000	430,000	+34.2%
Employment (jobs)	13,700 <sup>c</sup>	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.

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**

	<b>Existing Conditions</b>	<b>Project Buildout (2040)</b>	<b>SCAG Projections (2040)</b>	<b>Difference</b>
Households	10,623 <sup>a</sup>	13,245 (2,622 DUs) <sup>a</sup>	11,109 <sup>c</sup>	+2,136 DUs / +19.2%
Housing Units	11,156 <sup>a</sup>	13,931 (2,775 DUs)	N/A	N/A
Population	25,580 <sup>a</sup>	30,083 (6,503 persons) <sup>a</sup>	27,004 <sup>c</sup>	+5,079 persons / +18.8%
Employment	13,700 <sup>b</sup>	15,678 (1,978 jobs)	11,984 <sup>c</sup>	+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: <sup>a</sup> DOF 2022 <sup>b</sup> EDD 2022a <sup>c</sup> 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 Project 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 6<sup>th</sup> 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 6<sup>th</sup> Cycle RHNA partially overlapped preparation of the RTP/SCS, the 6<sup>th</sup> 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 6<sup>th</sup> 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 EA, 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 Project 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 place 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 L 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 6<sup>th</sup> Cycle RHNA allocation; and less than significant impacts related to indirect population growth or direct employment growth, and 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 (6<sup>th</sup> 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 6<sup>th</sup> 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 housing element update relies 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, an update and expansion of the 1996 Mission Street Specific Plan (MSSP).

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. In addition, the Project introduces an affordable housing overlay district to allow projects with affordable housing to be distributed across the City on appropriate sites. The Housing Element update balances 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.

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, it is speculative at this time due to lack of sufficient information.

As discussed above, the 2021–2029 Housing Element has 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.

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.

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**

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 6<sup>th</sup> 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 Project 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 Project and future growth and development in the County, and no mitigation is required.

### **3.12.8 MITIGATION MEASURES**

There would be less than significant impacts related to substantial growth and no impacts related to displacement of housing or people necessitating construction elsewhere, and no mitigation is required.

### 3.12.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Significant and unavoidable related to population and housing growth.

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.

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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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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.

#### **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<sup>1</sup> 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.

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<sup>1</sup> 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<sup>2</sup> 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 environment 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).

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<sup>2</sup> 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
<b>Total</b>	<b>722</b>	<b>576</b>
Source: SPPD 2022.		

### **School Services**

The South Pasadena Unified School District (SPUSD) provides educational services to the City, through three elementary schools, one middle school, and one high school. The SPUSD schools and their enrollment for the 2021–2022 school year are summarized in Table 3.13-2, SPUSD Schools and Enrollment for 2021-2022 School Year.

**TABLE 3.13-2  
SPUSD SCHOOLS AND ENROLLMENT FOR 2021-2022 SCHOOL YEAR**

School Name	Address	Enrollment (2020–21)
<b>SPUSD High School (Grades 9–12)</b>		
South Pasadena High School	1401 Fremont Avenue	1,450 students
<b>SPUSD Middle School (Grades 6–8)</b>		
South Pasadena Middle School	1500 Fair Oaks Avenue	1,146 students
<b>SPUSD Elementary Schools (Grades K–5)</b>		
Arroyo Vista Elementary School	335 El Centro Street	683 students
Marengo Elementary School	1400 Marengo Avenue	761 students
Monterey Hills Elementary	1624 Via Del Rey	584 students
<b>Total</b>		<b>4,649 students</b>
Source: CDE 2022.		

### **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 2020-2021 fiscal year, library collections included 114,300 physical items in print and audiovisual formats, 35,144 e-books and e-audiobooks, 27,403 downloadable video materials, and a wide variety of online resources (e.g., homework help language learning, tools for researchers and job seekers). In 2019, prior to the pandemic, more than 23,000 people attended library programs, including concerts, author talks, storytimes, hands-on crafting activities, book discussions, summer reading program performances and workshops, and other community-focused programs. Except for ongoing operational changes due to the COVID-19 pandemic, the SPPL is open 7 days a week for a total of 57 hours per week, or more than 2,679 public service hours in Fiscal Year 2018–2019. There were 3,270 new library cards issued, more than 260,000 visits, 11,000 reference interactions, approximately 323,000 items checked out, and over 22,000 internet computer sessions (CSL 2019, 2022).

## **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, summarizes the recreation amenities within the City.

**TABLE 3.13-3  
SOUTH PASADENA PARKS AND RECREATIONAL FACILITIES**

<b>Name/Location</b>	<b>Size (acres)</b>	<b>Facilities</b>
<b>Neighborhood Public Parks and Other Facilities</b>		
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
<b>Total Acres</b>	<b>92.7</b>	
Source: South Pasadena 1998		

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).

### **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, 2022 (South Pasadena 2022).

### **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, 2022, the capital fees are \$1.64 per sf for residential and \$1.07 per sf for commercial (South Pasadena 2022).

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## **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 HOUSING ELEMENT GOALS AND POLICIES**

There are no Housing Element 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 Project 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. This 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 Project, 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 Project, as discussed in Sections 3.1 through 3.16 of this Environmental Assessment (EA), and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation.

Therefore, with implementation of the Project would result in less than significant impacts to fire protection services and no mitigation is required.

### **Police Protection Services**

Future development pursuant to the Project 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 & 2021–2019 Housing Element. 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 Project, as discussed in Sections 3.1 through 3.16 of this EA, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, the proposed Project would result in less than significant impacts to police protection services, and no mitigation is required.

### **School Services**

Future development pursuant to the Project 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.

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 EA. Construction-related impacts that would be anticipated from new development would be similar to those addressed for buildout of the Project, as discussed in Sections 3.1 through 3.16 of this EA, 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 EA, other public services refer to library services.

Future development pursuant to the Project 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<sup>3</sup>) 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 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 21<sup>st</sup> 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

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<sup>3</sup> <https://www.wbdg.org/building-types/libraries/public-library>

constructed. However, a new Community Center remains in the planning stages, and the location and timing of this facility is unknown.

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. 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 EA 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 Project, as discussed in Sections 3.1 through 3.16 of this EA, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, the proposed Project would result in less than significant impacts to library services, and no mitigation is required.

**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.

To meet this standard for the existing population (25,580 persons), an estimated 9.5 acres of additional, or 128 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 Project (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 44.0 acres of additional, or approximately 162 acres total, of parks and other recreation acres would be needed.

In Spring 2017, the City has 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.

The City would strive to meet and maintain acceptable parkland standards. The City recognizes that providing adequate, or abundant, parks and other open spaces has substantial benefits both to its residents and to the environment. Site-specific improvement plans would be evaluated 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 Project, as discussed in Sections 3.1 through 3.16 of this EA, and specifically Section 3.2, Air Quality; Section 3.11, Noise; and Section 3.14, Transportation/Traffic.

Therefore, the Project 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 Project would require approximately 44.0 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 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, the Project 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 would be constructed through adoption of the Project. 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 EA, 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 environmental review once specific development plans are identified.

Therefore, the proposed Project would result in less than significant impacts to park construction, and no mitigation is required.

### **3.13.7 CUMULATIVE IMPACTS**

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 Project 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 Project 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 environmental review once specific development plans are identified. Since new parks

developed under the Project 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. Therefore, no mitigation is required.

### 3.13.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

### 3.13.10 REFERENCES

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## **3.14 TRANSPORTATION**

### **3.14.1 METHODOLOGY**

This section evaluates the potential for implementation of the proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project)s 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.

### **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 City’s VMT 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 24.4 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
<b>Baseline</b>	375,456	25,932	<b>14.5</b>	869,167	35,646	<b>24.4</b>

## **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 L 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 also provides transit services through its Access service for people who have a disability. Access service will pick up and drop off disabled riders within ¾-mile or less from Metro routes. 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 L 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, and 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 L 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—as well as 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 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 changes 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. 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 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 2019 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). The one-half mile radius around Metro’s L Line Station at the Mission Street and Meridian Avenue intersection and along much of Fair Oaks Avenue are identified as HQTAs.

### ***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 plan 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 L 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 HOUSING PLAN GOALS AND POLICIES**

There are no Housing Element 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 Project is consistent with the planning goals of the 2020–2045 RTP/SCS and 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 Project is consistent with the Complete Streets Act by supporting the City’s Complete Streets Policy. The City considers roadways, complete streets, transit, and bicyclist and pedestrian travel as key components 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.

#### ***Bicyclist Travel***

***Future bicycle facilities are a mixture of bicycle routes, bicycle lanes, and bicycle paths. Bicycle travel in the City is supported by 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. Pedestrian Travel***

The Project promotes the development of mixed-use, pedestrian-friendly areas clustered around activity centers; encourages community interaction through the development and enhancement of plazas, open space, public places, and pedestrian connections with the public realm; and enhances streets to facilitate safe walking through community participatory design.

#### ***Conclusion***

In summary, implementation of the Project would support improved public transit, bicycle, and pedestrian facilities as well as roadway circulation. 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. 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)?**

A significant impact would occur if the VMT per capita or service population for the land use plan exceeds the VMT per capita 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. 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, and employment-generating development would be

focused primarily within the Ostrich Farm District and as part of infill development in Downtown and along other arterial roadways. The Ostrich Farm District is already home to creative offices and is therefore a natural area for expansion. New infill office development on Mission Street, Fair Oaks Avenue, and Huntington Drive 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 to meet the requirements of the RHNA and HCD.

Also, accessory dwelling units (ADUs) are allowed in all City zones that allow for single-family and multifamily residential units.

The real-life distribution of land uses that would generate VMT will vary. Individual projects would be built incrementally over time and, where necessary, circulation improvements would be implemented by Public Works.

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. This would reduce the VMT per capita and VMT per service population compared to the existing condition. 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 transportation impact, and, 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 Project 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 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. 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 Project would 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. Any 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 development implemented pursuant to the 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**

Future development pursuant to the Project, 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 Project would be consistent with regional plans and policies for the circulation system, reflecting all modes of travel. 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. 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 Project. Therefore, no mitigation is required.

### **3.14.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Less than significant.

### **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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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, 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<sup>1</sup> 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) 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 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

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<sup>1</sup> 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 EA because they are derived using different methodologies and used for different purposes.

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 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 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. 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 four different pressure zones: Pasadena, Raymond, Bilicke, and Central. 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 that supplies water to the Pasadena zone 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<sup>2</sup> 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.

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<sup>2</sup> 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.

### ***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 HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element 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. Also, 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; 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 .14 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 Project 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.

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 Environmental Assessment (EA).

#### **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 Project would generate a demand for water that will require increased pumping of groundwater resources and imported water use. The following water supply analysis is based on the City's 2020 UWMP and input from 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) (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 Project 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 Project the estimated 6,882 residents would generate approximately 30,281 PPD of solid waste, or approximately 5,526 tons per year<sup>3</sup>. The estimated 1,978 employees would generate approximately 31,252 PPD of solid waste, or approximately 5,704 tons per year<sup>4</sup>. 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

<sup>3</sup> (30,281 PPD \* 365 days)/2,000 pounds per ton = 5,526 tons per year

<sup>4</sup> (31,252 PPD \* 365 days)/2,000 pounds per ton = 5,704 tons per year

further reduce the waste stream, which is unlikely. It is also noted that these figures assume population growth with no residential vacancies, which is unlikely.

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. 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**

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 Project 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), 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. Based on information provided by LACSD, 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 .14 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. 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 Project. Therefore, no mitigation is required.

### 3.15.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Less than significant.

### 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 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (Project).

### **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.” 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 2021). 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<sup>1</sup> 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*. 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

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<sup>1</sup> 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.

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:

(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 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. 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. The promulgation of these regulations by the board is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose. Consistent with fuels management objectives, steps should be taken to minimize erosion. For the purposes of this subparagraph, “fuel” means any combustible material, including petroleum-based products and wildland fuels.”

(B) A greater distance than that required under subparagraph (A) may be required by state law, local ordinance, rule, or regulation. Clearance beyond the property line may only be required if the state law, local ordinance, rule, or regulation includes findings that the clearing 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. Clearance on adjacent property shall only be conducted following written consent by the adjacent landowner.

(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 clearing 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.

### ***Senate Bill 969***

Senate Bill 969, signed into law in 2018, applies to all new garage doors and garage door opener installations. The law states that when a new garage door is installed or when an existing garage door opener is replaced, the homeowner must install a battery backup garage door opener. Widespread power outages are often associated with wildfires. Without electricity, homeowners/occupants are unable to open their garage doors using the garage door opener. While garage doors do have an emergency cord, which disconnects the garage door from the

garage door opener, some people have difficulty engaging the emergency release and/or manually opening the garage door.

## **City**

### ***Municipal Code***

As stated above, the City has a self-defined High Risk Fire Area pursuant to Section 14.1 et. seq. of the SPMC. The location of this area and the requirements for construction in this area related to fire prevention and protection are as follows:

#### 14.1 High risk fire area and special provisions related to roof types.

1. High Risk Fire Area. “High risk fire area” is defined as those properties located south of Monterey Road, extending to the city border, and west of Meridian Avenue, extending to the city border.
2. Special Provisions Related to Roof Types. Except as permitted below, roof covering assemblies shall be Class A.

The following exceptions shall only apply to structures not located within the high risk fire area as defined in subsection (1) of this section:

#### Exceptions:

- a. Replacements within any 12-month period of time that are not more than 25 percent of the total roof area of any individual structure shall be not less than Class C;
- b. Replacements within any 12-month period of time that are not more than 50 percent of the total roof area of any individual structure shall be not less than Class B;
- c. Entirely noncombustible roof assemblies of masonry or concrete construction;
- d. Clay or concrete roof tile installed on an entirely noncombustible substructure;
- e. Roof assemblies of ferrous or copper shingles or sheets installed on an entirely noncombustible substructure;
- f. Where the fire chief makes a written finding that a less fire resistive roof covering is permissible based on existing conditions.

In no case shall any roof covering be less fire resistive than required by Chapter 15 of the current South Pasadena building code or Chapter 9 of the current South Pasadena residential code.

It is noted that the requirement for Class A roof assemblies, and the exceptions cited above, are consistent with Section R902.1, Roof Covering Materials, of the California Residential Code (Title 24, Part 2.5 of the California Code of Regulations).



### **Emergency Operations Plan**

The *City of South Pasadena and the South Pasadena Unified School District Joint Emergency Operations Plan* (EOP) address the City’s planned response to emergency/disaster situations associated with natural disasters, human-made emergencies, and national security emergencies. The EOP does not address day-to-day emergencies or the well-established and routine procedures used in coping with such emergencies. Instead, the operational concepts reflected in the EOP focus on large-scale events and was developed with a multi-hazard perspective to make it applicable to the emergency operations for the widest range of emergencies and disasters, both natural and human caused, of the City and the South Pasadena Unified School District. This plan was a preparedness document—designed to be read, understood, and exercised prior to an emergency/disaster. The EOP was prepared in compliance with California Standardized Emergency Management System and National Incident Management System, and also incorporates the concepts and principles of the and the Incident Command System (South Pasadena 2012).

### **Draft Local Hazard Mitigation Plan**

The *Draft Local Hazard Mitigation Plan* (HMP) assists the City in reducing vulnerability to disasters by identifying critical facilities, resources, information, and strategies for risk reduction, while helping to guide and coordinate mitigation actions. The HMP provides a set of strategies intended to do the following: reduce risk from natural hazards through education and outreach programs, foster the development of partnerships, and implement risk reduction activities. Hazard mitigation ensures that post-disaster repairs and reconstruction result in a true reduction in future hazard vulnerability (South Pasadena 2018).

Additionally, the federal Disaster Mitigation Act of 2000 requires that local governments, as a condition of receiving federal disaster mitigation funds, have a mitigation plan that describes the process for identifying hazards, risks and vulnerabilities, identifies and prioritizes mitigation actions, encourages the development of local mitigation, and provides technical support for those efforts. The City’s HMP serves to meet these requirements and therefore enables the receipt of federal disaster funds, when applicable.

### **3.16.4 THRESHOLDS OF SIGNIFICANCE**

The following significance criteria are derived from Appendix G of the State CEQA Guidelines. If located in or near State responsibility areas or lands classified as VHFHSZ, a project would result in a significant adverse wildfire impact if it would:

**Threshold 3.16a:** Substantially impair an adopted emergency response plan or emergency evacuation plan;

**Threshold 3.16b:** Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

**Threshold 3.16c:** Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or

**Threshold 3.16d:** Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

### 3.16.5 PROPOSED HOUSING ELEMENT GOALS AND POLICIES

There are no Housing Element goals or policies related to wildfire.

### 3.16.6 ENVIRONMENTAL IMPACTS

**Threshold 3.16a: If located in or near State responsibility areas or lands classified as VHFHSZ, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

As noted above, while no part of the City of South Pasadena is classified as a VHFHSZ, there are lands immediately to the west and southwest that are identified by CAL FIRE as VHFHSZ. Additionally, the City has defined the southwest corner of South Pasadena as a High Risk Fire Area. For purposes of this analysis, the City-defined High Risk Fire Area is treated the same as a VHFHSZ.

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 Project. 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 the following: 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 3.16b: If located in or near State responsibility areas or lands classified as VHFHSZ, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

There are parcels identified for potential housing in the Suitable Sites Inventory, which is a required part of housing element preparation, within the City's designated High Risk Fire Area covering properties south of Monterey Road and west of Meridian Drive. Some of these parcels are situated on or near existing slopes. However, 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. Therefore, new development pursuant to the Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose residents or other persons to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. There would be less than significant impacts, and no mitigation is required.

**Threshold 3.16c: If located in or near State responsibility areas or lands classified as VHFHSZ, would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

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 may be implemented either to alleviate existing issues or in support of anticipated future growth. The need for and installation of new infrastructure would be determined during the City's discretionary review process for new development and redevelopment. Extension of utilities or roadway improvements would serve only the existing and proposed uses and would most likely be installed in existing public rights-of-way and/or private property (e.g., water and sewer laterals, gas line connections). Also, new or replacement infrastructure would not extend into wildlands or otherwise substantively beyond the existing urban land uses. As such, while implementation of the Project may result in the installation and maintenance of infrastructure, the locations of this infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. There would be a less than significant impact, and no mitigation is required.

**Threshold 3.16d: Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

The designated High Risk Fire Area is located in the hilly portion of the City. Accordingly, any development or redevelopment in this area would be subject to Section 36.340 et. seq. of the SPMC. This section 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). Procedures for Hillside Development Permits are established in Section 36.410.065 of the City Municipal Code.

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 and erosion as it pertains to the site's unique topography 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 are adopted and maintained, and that development in areas subject to the hillside ordinance are fully investigated. As such, while implementation of the Project may result in development or redevelopment in hillside areas, through compliance with State and City requirements structures would not be exposed to significant downslope or downstream risks as a result of runoff, post-fire slope instability, or drainage changes. There would be a less than significant impact, and no mitigation is required.

### **3.16.7 CUMULATIVE IMPACTS**

The geographic context for cumulative wildfire impacts is generally the City of South Pasadena and those areas within the cities of Los Angeles and Pasadena that are within VHFHSZs abutting the City of South Pasadena (refer to Exhibit 3.16-1). Compliance with State and local regulations pertaining to development in VHFHSZs and/or on hillsides in the cities of Los Angeles and Pasadena would be required of all development in the cumulative area for wildfires. Individual projects would be designed and built in accordance with applicable standards in the CBC and the city's respective municipal codes as well as all requirements pertaining to emergency access and evacuation. Site-specific geotechnical hazards related to slope and/or landslide risk would be addressed by the geotechnical investigations required by individual cities and the County for each development proposal. Compliance with applicable State and local regulations would prevent significant adverse impacts associated with wildfire hazards, and impacts associated with the Project would not be cumulatively considerable, and no mitigation is required.

### **3.16.8 MITIGATION MEASURES**

No significant adverse impacts related to wildfire have been identified with implementation of the Project. Therefore, no mitigation is required.

### **3.16.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Less than significant.

### 3.16.10 REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE). 2023a. (April 25, access date) FHSZ Viewer. Sacramento, CA: CAL FIRE. FHSZ Viewer (ca.gov).

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South Pasadena, City of. 2018 (July). *Draft Local Hazard Mitigation Plan*. South Pasadena, CA: the City. Draft (V1) (southpasadenaca.gov).

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## 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 Environmental Assessment (EA). 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. 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. The City's current General Plan, including the Housing Element, does not align with the City's vision for its future nor with the need to provide housing in compliance with State law.

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; 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 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 required the 2021–2029 Housing Element to demonstrate capacity for a surplus of units beyond the RHNA allocation. The Court Order<sup>1</sup> requires that the City bring its Housing Element into compliance with State Planning Law. The changes in the draft 2021–2029 Housing Element is reflected in both the General Plan and DTSP Update, being prepared contemporaneously. This EA is based on environmental analysis of both the residential development capacity identified in the 2021–2029 Housing Element and the non-residential development capacity identified in the General Plan and DTSP Update still in progress (referred to as the Project herein). The central strategy of the 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 Project 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 EA). The full buildout of the Project, for purposes of this EA, 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.

It is important to note that the Project 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 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 (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 Project seeks 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. 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.
4. Develop clear and precise standards that offer predictable outcomes and processes.
5. 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.

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<sup>1</sup> *Stipulated Judgment (Californians For Homeownership V. City of South Pasadena, LASC Case Nos. 22STCP01388 & 22STCP01161)*

6. 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.

#### **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 Project, which include:

- Air Quality (Air Quality Management Plan Consistency, Air Quality Standards Violation, and Cumulative Air Quality Impacts);
- Greenhouse Gas Emissions (GHG Emissions, Plan Consistency);
- Noise (Direct and Cumulative Construction and Exterior Traffic Noise Standard Violation); and
- Population and Housing (Population Growth).

#### **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 EA.

The following alternative has been considered and eliminated from detailed consideration for the reasons identified in Section 4.2, below:

- Alternative Site, and
- No Project/No Development.

Alternatives that are considered in detail in this EA include:

- Alternative 1: No Project/Existing General Plan; and
- Alternative 2: Reduced Development Capacity.

#### **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 Project encompasses 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 EA is not required.

#### **4.2.2 NO PROJECT/NO DEVELOPMENT**

Section 15126.6(e) of the State CEQA Guidelines requires that 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”..

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 EA 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 Update goals, policies, and actions; and (3) the Mitigation Measures (MMs) identified in Section 3.0, Environmental Analysis, of this EA 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 current General Plan goals and policies and Land Use Map. The current Land Use Map is provided in Exhibit 2 in Section 2.0, Environmental Setting and Project Description, of this EA. It is noted that retention of the 2014–2021 Housing Element would violate State law as well as the Court Order; 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, 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. However, this is a purely hypothetical exercise and cannot be an actionable alternative.

Buildout under this alternative is estimated at 265 DUs in the City over the next approximately 20 years (through 2040), or approximately 13 percent of the Project’s residential units. This estimate 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<sup>2</sup> (assuming no residential vacancy) and 304 jobs<sup>3</sup>. Compared to the proposed Project, this development capacity would result in 2,510 fewer DUs, 63,876 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 form-based 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

<sup>2</sup> Based on a rate of 2.48 persons per household derived from the California Department of Finance demographic data for the City (2022).

<sup>3</sup> Based on a rate of 1 employee per 200 sf with an 8 percent vacancy as per the Market Analysis (HR&A 2017).

redevelopment. Future development under this Alternative would result in similar types and proportions of land uses as currently exist; the same City height limits; and be subject to the same design standards and processes as the Project, with the exception of the form-based 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, substantially degrade the City's visual quality and character, 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. However, the City must adopt a 2021–2029 Housing Element or be in violation of State law as well as implement requirements of the Court Order, including is to seeking, 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).

### **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, 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. Even with incorporation of MM AQ-1 requiring a project-level air quality analysis for future development projects, construction of development projects would have the potential to result in significant and unavoidable impacts with respect to construction activity. Although construction-related emissions would be reduced, for the same reasons as the proposed Project, Alternative 1 would result in significant and unavoidable direct and cumulative impacts during construction activity with implementation of MM AQ-1.

The Project would exceed the SCAQMD threshold for regional volatile organic compounds (VOC) emissions by over 60 percent. VOCs are an ozone (O<sub>3</sub>) precursor. The primary source of VOC emissions would be consumer products. MM AQ-1 requires that future projects would provide a project-specific air quality analysis that includes mitigation measures, as needed, to reduce the any significant impacts to the maximum extent feasible. 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, on average, about 14 percent of the Project (i.e., 13 percent of housing units and 15 percent on non-residential) it is possible Alternative 1 would not result in significant operational emissions of VOC. As discussed for the Project, because the effects of MM AQ-1 cannot be quantified at this time, operational emissions would be considered directly and cumulatively significant and unavoidable for Alternative 1.

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 direct and cumulative impacts related to inconsistency with the 2022 AQMP, same as the Project.

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 the northernmost segment of the DTSP area is within 500 feet of SR-110, 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 related to exposure to TACs with MM AQ-2, 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 with implementation of MMs BIO-1 through BIO-5.

### ***Cultural and Tribal Cultural Resources***

Alternative 1 is anticipated to result in reduced impacts to cultural and tribal cultural resources compared to the proposed Project, commensurate with the reduced geographic scope of potential development and redevelopment. As such, Alternative 1 is expected to involve demolition or substantial alteration of fewer built environment resources compared to the proposed Project. Similarly, Alternative 1 would also 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 cultural and tribal cultural resources would be reduced to a less than significant 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 in less than significant impacts 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 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.

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 after implementation of MM CUL-1.

### ***Greenhouse Gas Emissions***

Alternative 1 would generate reduced total greenhouse gas (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 an average of 14 percent of the Project, at the program level, GHG emissions would potentially result in a significant impact on the environment. MM GHG-1 requires project-level GHG analysis and appropriate mitigation actions shall be implemented. Because the effects of MM GHG-1 cannot be quantified at this time, impacts would remain significant and unavoidable under Alternative 1, 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, and EO B-55-18, and there would be a less than significant impact. 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 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 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 would be similar to those of the proposed Project.

### ***Land Use and Planning***

Alternative 1 would result in a new significant and unavoidable impact 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. Buildout under Alternative 1 would result in reduced vehicle trips. Alternative 1 would involve an 90 percent reduction in residential development and an 85 percent reduction in non-residential development. However, as shown in Table 3.11-9 in Section 3.11, Noise, of this EA, the contribution of the proposed Project's traffic noise would be less than three dBA, which is considered barely perceptible to human hearing. 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. Interior noise levels and stationary source noise levels for future development projects, residential and non-residential, would remain less than significant 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 receiver locations within 200 feet, after implementation of MMs NOI-4 through NOI-7, would affect fewer

existing receptors. Like the proposed Project, vibration generated during construction would be less than significant with implementation of MMs NOI-4 and NOI-5; and within 50 feet of the Metro L Rail Line with implementation of MM 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**

	<b>Existing Conditions</b>	<b>Alternative 1 Buildout (2040)</b>	<b>SCAG Projections (2040)</b>	<b>Difference</b>
Households	10,623 <sup>a</sup>	10,873 (250 DUs) <sup>a</sup>	11,109 <sup>c</sup>	-236 DUs / -2.1%
Housing Units	11,156 <sup>a</sup>	11,421 (265 DUs)	11,822 <sup>a</sup>	N/A
Population	25,580 <sup>a</sup>	26,200 (620 persons) <sup>a</sup>	27,004 <sup>c</sup>	-804 persons / -3.0%
Employment	13,700 <sup>b</sup>	14,004 (304 jobs)	11,984 <sup>c</sup>	+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:				
<sup>a</sup> DOF 2022				
<sup>b</sup> EDD 2022				
<sup>c</sup> 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. 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).

Therefore, Alternative 1 would avoid the significant and unavoidable impact 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 6<sup>th</sup> Cycle RHNA allocation. 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 and arterial roadways such as the Mission L Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive.

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 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. 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. 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.

### ***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 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 related to these utilities and service systems. Therefore, with reduced demands, Alternative 1 would also result in less than significant impacts 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 not substantially impact emergency response or evaluation, exacerbate wildfire risks, including due to installation or maintenance of infrastructure, and expose persons to pollutant concentrations from wildfire; or expose people or structures to significant risks subsequent to wildfire such as flooding or landslides. Wildfire impacts of Alternative 1 would be less than significant.

## **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 five of the six 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, 4, 5, and 6 can be attained through policy implementation by the City unrelated to the location or extent of development. Similarly, objective 3 would be met because Alternative 1 would still direct growth primarily towards the downtown and Ostrich Farm areas, which is also a policy decision.

## **Conclusion**

Alternative 1 would avoid the significant and unavoidable impact related to visual character. However, the City must adopt a 2021–2029 Housing Element or be in violation of State law as well as implement requirements of the Court Order, including placement of a ballot measure proposing the repeal of the City's 45-foot height limit for sites that meet specific characteristics.

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, VOC emissions, GHG emissions, or GHG plan inconsistency because the effects of MMs AQ-1 and GHG-1, requiring project-level analysis and mitigation measures, cannot be quantified at this time. 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 6<sup>th</sup> 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 alleviate the total significant and unavoidable impacts of the Project, by eliminating one impact (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) planning programs and policies related to reducing GHG emissions consistent with SB 375.

### 4.3.2 ALTERNATIVE 2: REDUCED DEVELOPMENT CAPACITY

#### Description of the Alternative

During preparation of the EA for the General Plan and DTSP Update, the City chose to combine the proposed housing element update into the proposed Project. The proposed 2021–2029 Housing Element Update incorporates the 6<sup>th</sup> Cycle RHNA issued by the SCAG, which requires the City to provide 2,067 DUs plus the HCD-required surplus of 708 DUs between 2021 and 2029. The City chose to retain the environmental analysis in the Administrative Draft EA that has already been prepared for the former project without the Housing Element in condensed form as an alternative to the Project.

Therefore, Alternative 2 assumes a net increase in development capacity of 589 DUs (or approximately 28 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 form-based 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	
<b>Corridors<sup>a</sup></b>					
Downtown Specific Plan Area	80.0	300	100,000	125,000	738
<b>Districts<sup>a</sup></b>					
Ostrich Farm	13.4	75	5,000	100,000	185
<b>Neighborhood Centers<sup>a</sup></b>					
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
<b>Remainder of City<sup>b</sup></b>					
Vacant Lots Outside Focus Areas	N/A	89	0	0	219
<b>Totals</b>	–	<b>589</b>	<b>130,000</b>	<b>300,000</b>	<b>1,449</b>
du: dwelling units; sf: square feet; N/A: not available					
Sources:					
<sup>a</sup> South Pasadena 2017a					
<sup>b</sup> Inloes 2018					
<sup>c</sup> 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 form-based 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, substantially degrade the City's visual quality and character, or result in a substantial increase in light and glare.

### ***Air Quality***

Criteria pollutant emissions were quantified for the development of 589 DUs and 430,000 sf of non-residential growth as part of EA preparation prior to the inclusion of the 2021–2029 Housing Element. However, in June 2021, the latest version of the California Emissions Estimator Model™ (CalEEMod), which is used to model air quality and GHG emissions, was released. This EA uses the current CalEEMod version for analysis of the proposed Project. While modeling results are generally similar between versions, they do not represent an apples-to-apples comparison.

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 nitrous oxides (NOx), whose primary source is combustion engines. Emissions of VOCs were below the SCAQMD significance threshold. Like the proposed Project, mitigation was required to perform a project-specific analysis. Similar to the Project, it was concluded that because the effects of MM AQ-1 cannot be quantified at this time, operational emissions would be considered directly and cumulatively significant and unavoidable for Alternative 2.

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. Even with incorporation of MM AQ-1 requiring a project-level air quality analysis for future development projects, construction of development projects would have the potential to result in significant and unavoidable impacts with respect to construction activity. Although construction-related emissions would be reduced, Alternative 2 would result in significant and unavoidable direct and cumulative impacts during construction activity with implementation of MM AQ-1.

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 direct and cumulative impacts related to inconsistency with the 2022 AQMP, same as the Project.

Although overall emissions would be reduced under this alternative, because there are properties within 500 feet of SR-110 that may be developed/redeveloped, 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 related to exposure to TACs with MM AQ-2, 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 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 with implementation of MMs BIO-1 through BIO-5.

### ***Cultural and Tribal Cultural Resources***

Alternative 2 is anticipated to result in reduced impacts to cultural and tribal cultural resources compared to the proposed Project, commensurate with the reduced geographic scope of potential residential development and redevelopment. As such, Alternative 2 is expected to involve demolition or substantial alteration of fewer built environment resources compared to the proposed Project. Similarly, Alternative 2 would also 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 cultural and tribal cultural resources would be reduced to a less than significant 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 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 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.

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 after implementation of MM CUL-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 EA preparation prior to the inclusion of the 2021–2029 Housing Element. However, in June 2021, the latest version of CalEEMod was released. This EA uses the current CalEEMod version for analysis of the proposed Project. While modeling results are generally similar between versions, they do not represent an apples-to-apples comparison.

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. MM GHG-1 developed of part of the Administrative Draft for the formerly defined project required adoption of a Climate Action Plan (CAP) within 24 months of the General Plan and DTSP Update's adoption. The required CAP would have ensured that GHG emissions from buildout of the proposed Project were minimized. However, it was also concluded that the CAP may not feasibly obtain the AB 32 targets and that additional Statewide measures would be necessary to reduce GHG emissions to meet legislative goals. Because additional Statewide measures were not currently available, some of which would involve unforeseen advances in technology, GHG impacts were considered significant and unavoidable for development of 589 DUs and 430,000 sf of growth through 2040.

Alternative 2 would generate reduced greenhouse gas (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. Like the proposed Project, MM GHG-1 in this Draft EA requires project-level GHG analysis, and appropriate mitigation actions shall be implemented. Because the effects of MM GHG-1 cannot be quantified at this time, impacts would remain significant and unavoidable 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, and EO B-55-18, and there would be a less than significant impact. 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 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 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 would be similar to those of the proposed Project.

### ***Land Use and Planning***

Alternative 2 would result in a new significant and unavoidable impact 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 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, would not substantially change the development pattern of the City, and would not divide established communities.

**Noise**

Alternative 2 would result in reduced noise impacts from construction and operation of the reduced development capacity compared to the Project. Buildout under Alternative 2 would result in reduced vehicle trips. Alternative 1 would involve a 72 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 EA, the contribution of the proposed Project’s traffic noise would be less than three dBA, which is considered barely perceptible to human hearing. 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. Interior noise levels and stationary source noise levels for future development projects, residential and non-residential, would remain less than significant 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 receiver locations within 200 feet, after implementation of MMs NOI-4 through NOI-7, would affect fewer existing receptors. Like the proposed Project, vibration generated during construction would be less than significant with implementation of MMs NOI-4 and NOI-5; and within 50 feet of the Metro L Rail Line with implementation of MM 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 1 BUILDOUT**

	Existing Conditions	Alternative 2 Buildout (2040)	SCAG Projections (2040)	Difference
Households	10,623 <sup>a</sup>	11,180 (557 DUs) <sup>a</sup>	11,109 <sup>c</sup>	-71 DUs / -0.6%
Housing Units	11,156 <sup>a</sup>	11,745 (589 DUs)	11,822 <sup>a</sup>	N/A
Population	25,580 <sup>a</sup>	26,961 (1,381 persons) <sup>a</sup>	27,004 <sup>c</sup>	-43 persons / -0.1%
Employment	13,700 <sup>b</sup>	15,678 (1,978 jobs)	11,984 <sup>c</sup>	+ 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: <sup>a</sup> DOF 2022 <sup>b</sup> EDD 2022 <sup>c</sup> 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. This is because, as discussed in Section 3.12, Population and Housing, of this EA, 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 6<sup>th</sup> 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.

Therefore, Alternative 2 would avoid the significant and unavoidable impact 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 6<sup>th</sup> 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 Mission L Line Station and the Metro bus lines along Fair Oaks Avenue and Huntington Drive.

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 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. 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. 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 be less than significant 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 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 related to these utilities and service systems. Therefore, with reduced demands, Alternative 2 would also result in less than significant impacts to water supply, water and wastewater infrastructure, wastewater treatment, solid waste, and dry utilities.

### ***Wildfire***

Approximately the southwest quadrant of the City is designated a High Risk Fire Area by the City of South Pasadena Municipal Code (SPMC). No fire hazard severity zones are designated by the California Department of Forestry and Fire Protection (CAL FIRE) within the City. Like the proposed Project, it is possible that parcels in the 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 not substantially impact emergency response or evaluation, exacerbate wildfire risks, including due to installation or maintenance of infrastructure, and expose persons to pollutant concentrations from wildfire; or expose people or structures to significant risks subsequent to wildfire such as flooding or landslides. Wildfire impacts of Alternative 2 would be less than significant.

### **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 five of the six 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, 4, 5, and 6 can be attained through policy implementation by the City unrelated to the location or extent of development. Similarly, objective 3 would be met because Alternative 2 would still direct growth primarily towards the downtown and Ostrich Farm areas, which is also a policy decision.

## **Conclusion**

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, VOC emissions, GHG emissions, or GHG plan inconsistency because the effects of MMs AQ-1 and GHG-1, requiring project-level analysis and mitigation measures, cannot be quantified at this time. 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 6<sup>th</sup> 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 alleviate the total significant and unavoidable impacts of the Project, by eliminating one impact (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) planning programs and policies related to reducing GHG emissions consistent with SB 375.

### **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, on the following page, provides a summary comparison of impacts resulting from both alternatives to the Project.

As shown in Table 4-4, both alternatives would eliminate the significant and unavoidable impact related to population resulting from the inconsistency between SCAG's growth projections prepared as part of the 2020-2045 RTP/SCS and SCAG's 6<sup>th</sup> Cycle RHNA allocation, because of the reduced residential development proposed in Alternatives 1 and 2. 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, the 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 not be as 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.

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 6<sup>th</sup> Cycle RHNA allocation, Court Order, and regional plans to reduce GHG emissions.

**TABLE 4-4  
COMPARISON OF IMPACTS FOR PROJECT ALTERNATIVES**

<b>Environmental Issue and EA Section</b>	<b>Alternative 1 (No Project/ Existing General Plan) Comparison to the Project</b>	<b>Alternative 2 (Reduced Development Capacity) Comparison to the Project</b>
3.1 Aesthetics	Similar Impacts	Similar Impacts
3.2 Air Quality	Reduced Impacts (Remains Significant and Unavoidable)	Reduced Impacts (Remains Significant and Unavoidable)
3.3 Biological Resources	Reduced Impacts	Reduced Impacts
3.4 Cultural and Tribal Cultural Resources	Reduced Impacts	Reduced Impacts
3.5 Energy	Similar Impacts	Similar Impacts
3.6 Geology and Soils	Similar Impacts (Geology); Reduced Impacts (Paleontology)	Similar Impacts (Geology); Reduced Impacts (Paleontology)
3.7 Greenhouse Gas Emissions	Reduced Impacts (Remains Significant and Unavoidable)	Reduced Impacts (Remains Significant and Unavoidable)
3.8 Hazards and Hazardous Materials	Reduced Impacts	Reduced Impacts
3.9 Hydrology and Water Quality	Reduced Impacts	Reduced Impacts
3.10 Land Use and Planning	New Significant and Unavoidable Impact	New Significant and Unavoidable Impact
3.11 Noise	Reduced Impacts (Remains Significant and Unavoidable)	Reduced Impacts (Remains Significant and Unavoidable)
3.12 Population and Housing	Elimination of Significant and Unavoidable Impact	Elimination of Significant and Unavoidable Impact
3.13 Public Services and Recreation	Reduced Impacts	Reduced Impacts
3.14 Transportation	Unknown	Unknown
3.15 Utilities and Service Systems	Reduced Impacts	Reduced Impacts
3.15 Wildfire	Similar Impacts	Similar Impacts

#### 4.5 **REFERENCES**

Aguilar, M. 2021 (June 10). Personal Communication. *E-mail correspondence between M. Aguilar (Clerk of the Board, Southern California Association of Governments) and J. Neary (Project Manager, Psomas) regarding 2040 demographic projections pursuant to the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.*

California Department of Finance (DOF). 2022 (January). Report E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2022, with 2020 Benchmark. Sacramento, CA: DOF. E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2022, with 2020 Benchmark. (E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022 | Department of Finance (ca.gov).

California Employment Development Department, Labor Market Information Division (EDD). 2022 (July). *Unemployment Rates and Labor Force: Cities and Census Designated Places by Individual County: Los Angeles.* Sacramento, CA: EDD. <https://www.labormarketinfo.edd.ca.gov/file/lfmonth/lasub.xls>.

Southern California Association of Governments (SCAG). 2020 (September 3). *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.* Los Angeles, CA: SCAG. Read the Plan Adopted Final Plan - Southern California Association of Governments.

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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. The following must be identified for the project being analyzed; the location of the required information in this Environmental Assessment (EA) 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 proposed 2021–2029 Housing Element and the non-residential development capacity envisioned in the General Plan and Downtown Specific Plan (DTSP) Update (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 Project 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 Project 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. 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.

The majority of future growth under the Project 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 the Project 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 EA. 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 Project, 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 Project 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 EA. As summarized in the Executive Summary of this EA, significant adverse impacts would be avoided or reduced to less than significant levels through compliance with the policies and actions in the proposed Project; compliance with existing regulations; and required mitigation measures (MMs). Significant unavoidable adverse impacts would remain related to Air Quality (Section 3.2), 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 Project 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 Project to provide direction when making land use and public service decisions.

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 Project would induce population growth within the City by facilitating directed growth. 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 Project are addressed in Section 3.12, Population and Housing, of this EA. Implementation of the 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 EA. This is considered a significant and unavoidable growth-inducing impact.

If the Project is adopted, the City will subsequently need to review and update, as needed, its Zoning Code to make sure it is consistent with policies in other planning documents. The environmental impacts of the update to the Zoning Code consistent with State law (Section 65860 of the Government Code). 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 EA. This is considered a significant and unavoidable growth-inducing impact.

**APPENDIX A-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 Wireless 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 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.	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 Candidate 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	

## Resource List

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 Caltrans)	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 A-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](http://WWW.SOUTHPASADENACA.GOV)

04/21/21

Andrew Salas, Chairperson  
Gabrieleno Band of Mission Indians, Kizh Nation  
P.O. BOX 393  
Covina, CA 91723

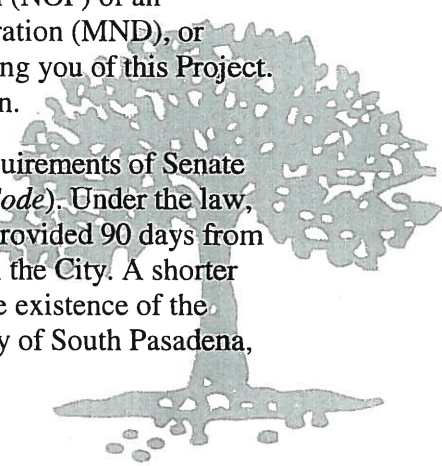
Dear Mr. Salas,

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.

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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](mailto: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.

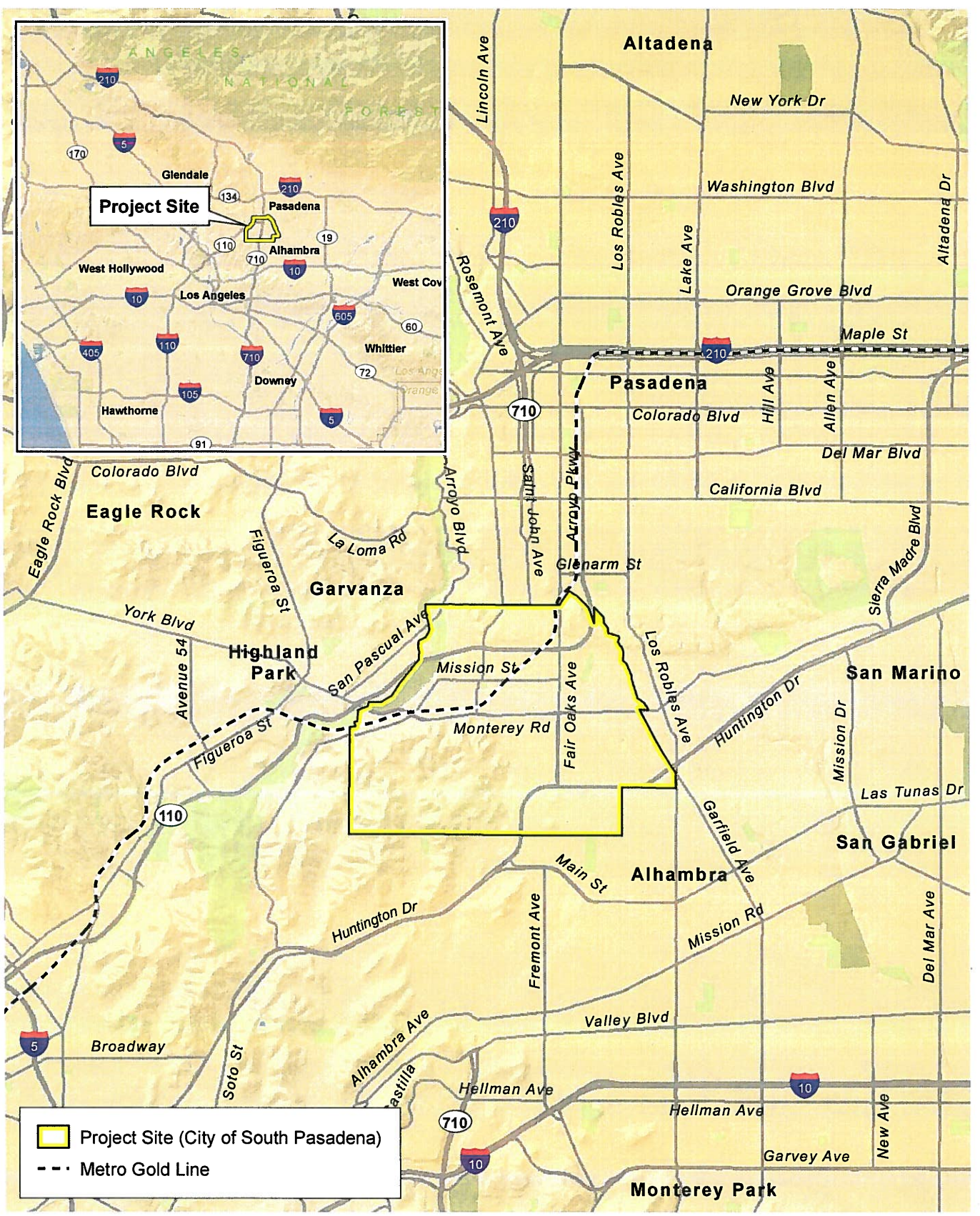
Sincerely,

*Margaret Lin*

Margaret Lin  
Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity

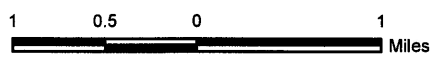
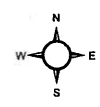




- Project Site (City of South Pasadena)
- Metro Gold Line

### Regional and Local Vicinity

South Pasadena General Plan and Downtown Specific Plan Update Project



### Exhibit 1





**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](http://WWW.SOUTHPASADENACA.GOV)

04/21/21

Anthony Morales, Chairperson  
Gabrieleno/Tongva San Gabriel Band of Mission Indians  
P.O. BOX 693  
Covina, CA 91778

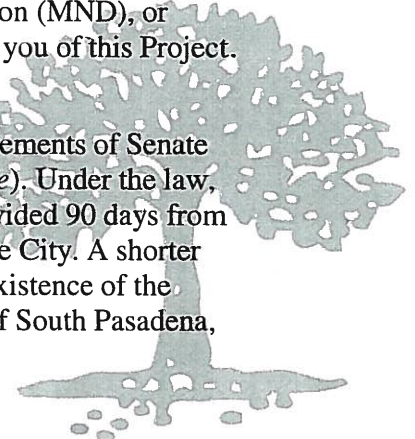
Dear Mr. Morales,

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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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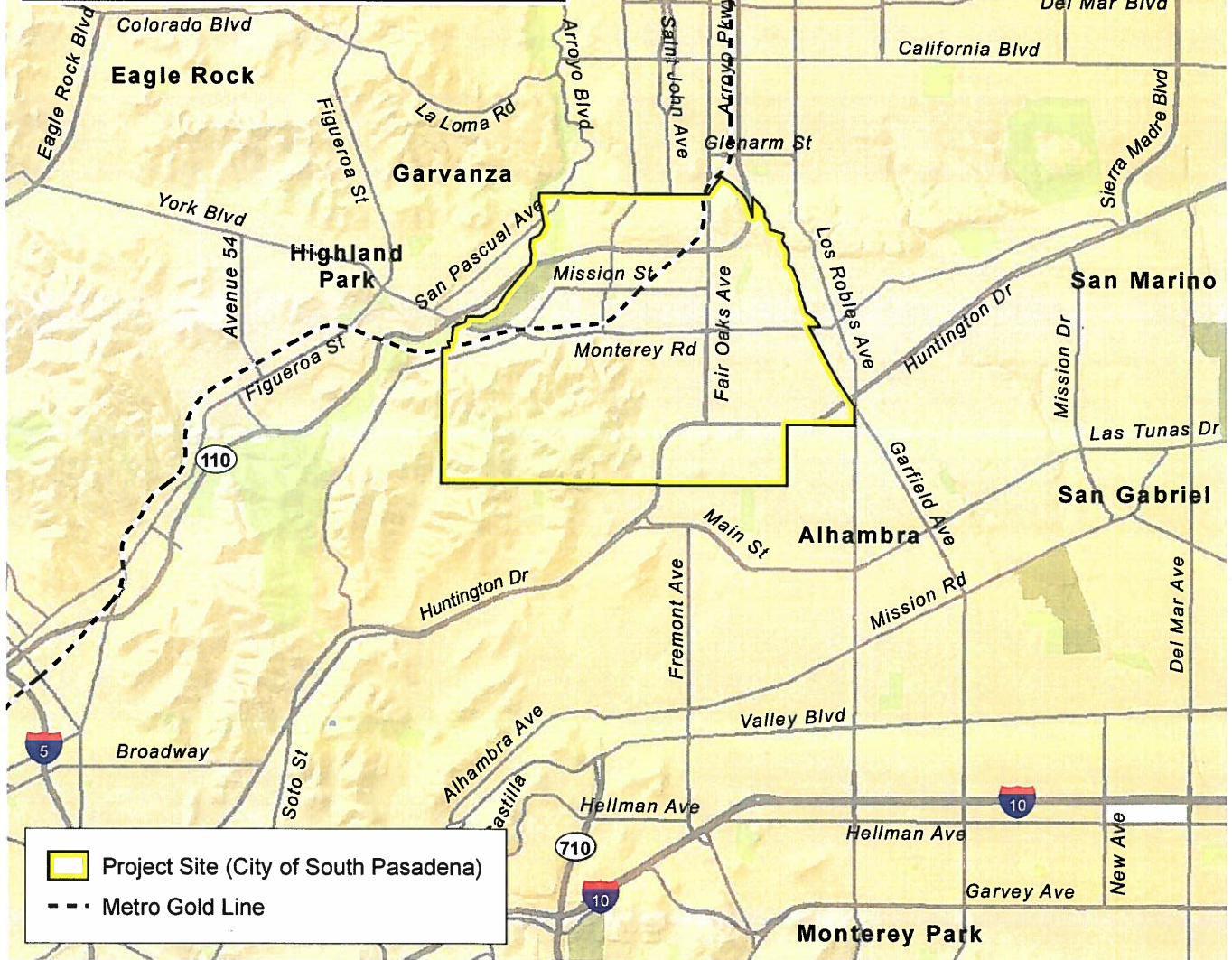
Sincerely,

*Margaret Lin*

Margaret Lin  
Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity





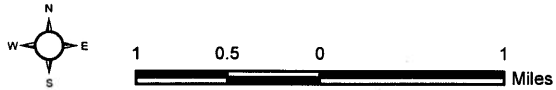
Project Site (City of South Pasadena)  
 Metro Gold Line

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## Regional and Local Vicinity

## Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project





**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](http://WWW.SOUTHPASADENACA.GOV)

04/21/21

Sandonne Goad, Chairperson  
Gabrieleno/Tongva  
106 ½ Judge John Aiso Street, #231  
Los Angeles, CA 90012

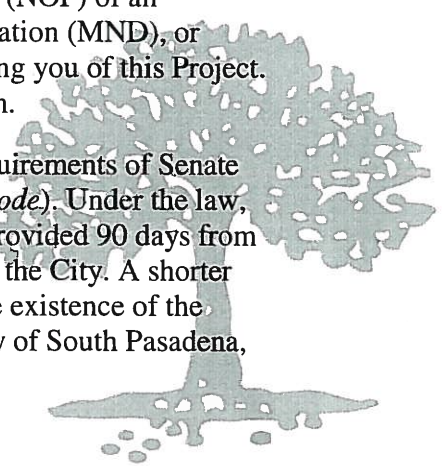
Dear Mr. Goad,

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1414 Mission Street  
South Pasadena, CA 91030

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Manager of Long Range Planning and Economic Development

Attachment – Exhibit 1, Regional and Local Vicinity



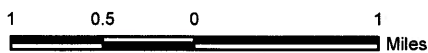


Project Site (City of South Pasadena)  
 Metro Gold Line

## Regional and Local Vicinity

## Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project





**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](http://WWW.SOUTHPASADENACA.GOV)

04/21/21

Robert Dorame, Chairperson  
Gabrieleno Tongva Indians of California Tribal Council  
P.O. BOX 490  
Bellflower, CA 90707

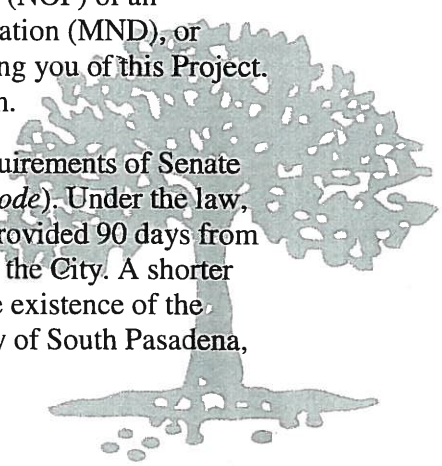
Dear Mr. Dorame,

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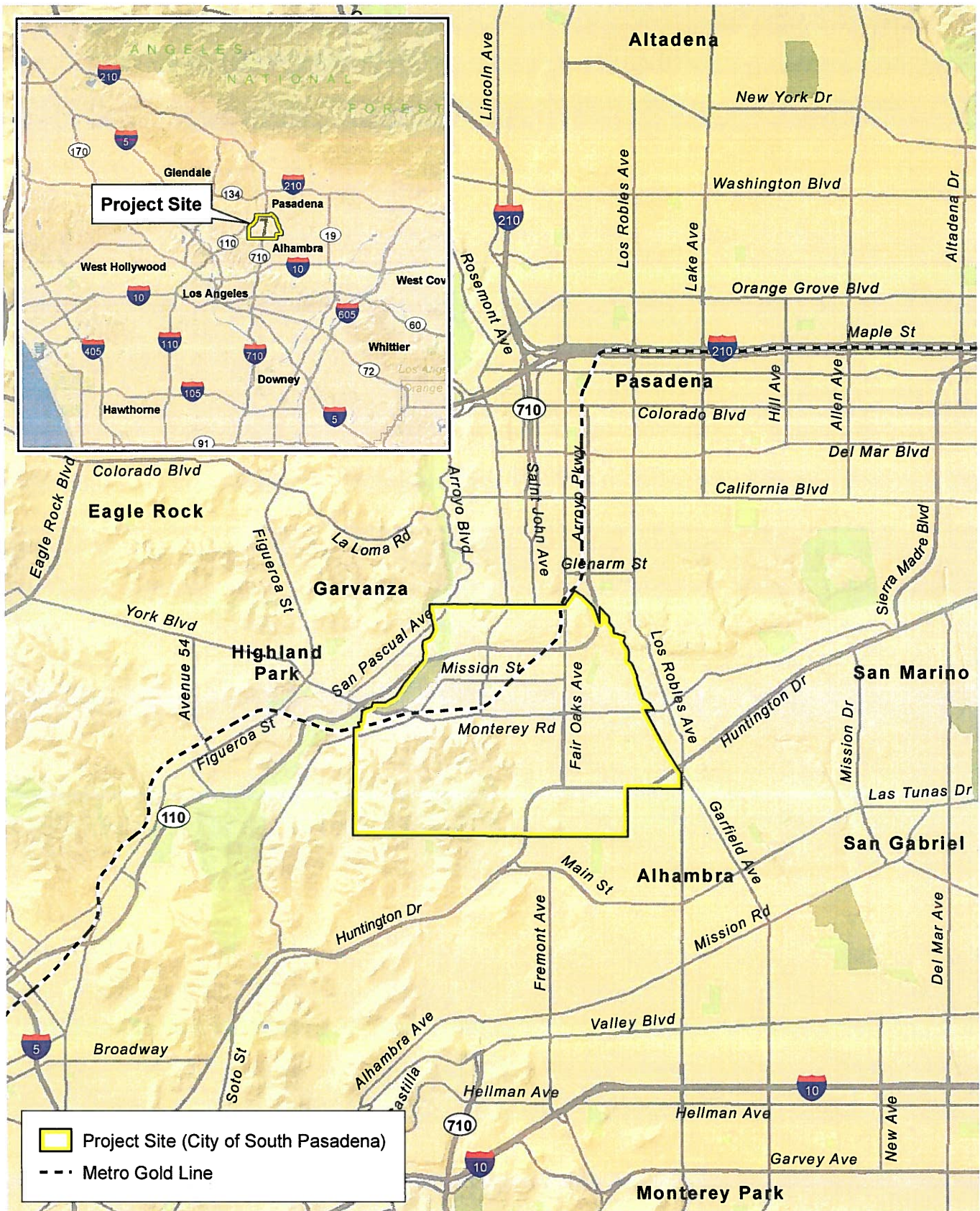
Sincerely,

*Margaret Lin*

Margaret Lin  
Manager of Long Range Planning and Economic Development

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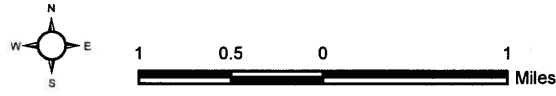


Project Site (City of South Pasadena)  
 Metro Gold Line

### Regional and Local Vicinity

South Pasadena General Plan and Downtown Specific Plan Update Project

### Exhibit 1



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**CITY OF SOUTH PASADENA**  
**PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT**  
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04/21/21

Charles Alvarez  
Gabrieleno-Tongva Tribe  
23454 Vanowen Street  
West Hills, CA 91307

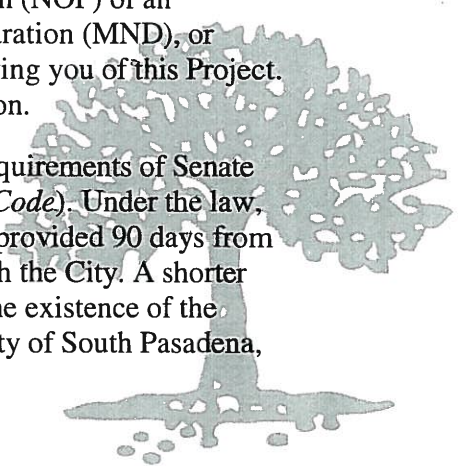
Dear Mr. Alvarez,

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.

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](mailto: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



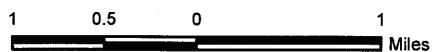


Project Site (City of South Pasadena)  
 Metro Gold Line

## Regional and Local Vicinity

## Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project





**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](http://WWW.SOUTHPASADENACA.GOV)

04/21/21

Scott Cozart, Chairperson  
Soboba Band of Luiseno Indians  
P.O. BOX 487  
San Jacinto, CA 92583

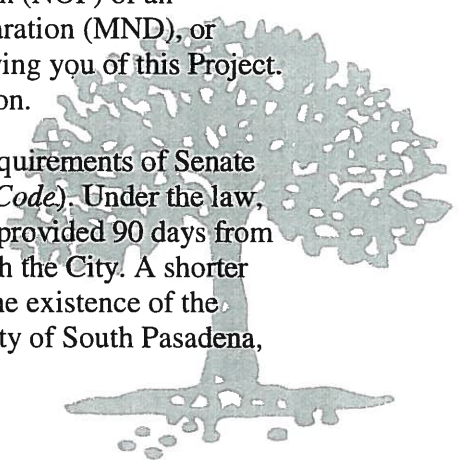
Dear Mr. Cozart,

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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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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





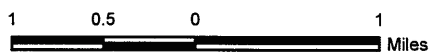
Project Site (City of South Pasadena)  
 Metro Gold Line

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## Regional and Local Vicinity

## Exhibit 1

South Pasadena General Plan and Downtown Specific Plan Update Project



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](mailto:tongvatcr@gmail.com).

Sincerely,

Sam Dunlap  
Cultural Resource Director  
Gabrielino Tongva Tribe  
[tongvatcr@gmail.com](mailto:tongvatcr@gmail.com)  
(909) 262-9351

**APPENDIX B**

**PALEONTOLOGICAL RECORDS SEARCH**



Natural History Museum  
of Los Angeles County  
900 Exposition Boulevard  
Los Angeles, CA 90007

tel 213.763.DINO  
www.nhm.org

Research & Collections

e-mail: [paleorecords@nhm.org](mailto: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 ( <i>Ganolytes</i> ), perch-like fish ( <i>Thyrsocles</i> ), ray-finned fish ( <i>Etringus</i> ), and other unspecified	Unknown

			fish	
LACM VP CIT342	Sparkletts property near 45th & Lincoln in Highland Park	Unknown formation (Pleistocene)	Mammoth ( <i>Mammuthus</i> ), Bison ( <i>Bison</i> )	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 ( <i>Mysticeti</i> )	found in hillslope rubble
LACM VP 7507	Near intersection of San Fernando Rd. & Humboldt St.	Monterey Formation	Perch-like fish ( <i>Thyrsocles kriegeri</i> )	31-32 m bgs (collected during excavations of the Humboldt Street Sewer Shaft)
LACM VP 1023	Workman & Alhambra Sts	Unknown Formation (Pleistocene)	Sabertooth cat ( <i>Smilodon</i> ), horse ( <i>Equus</i> ), deer ( <i>Odocoileus</i> ), Turkey ( <i>Meleagris</i> )	Unknown (excavations for storn drains)
LACM VP 2032	Los Angeles Brickyard Mission Rd. & Daly St.	Unknown Formation (Pleistocene, silt & clay)	Mastodon ( <i>Mammut</i> )	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