Draft Initial Study

2021–2029 Housing Element Project
City of South Pasadena, California

Prepared for

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

Prepared by

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May 2023

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TABLES

EXHIBITS

SECTION 1.0 PROJECT INFORMATION

1. Project Title:	2021–2029 Housing Element Project
2. Lead Agency Name and Address:	City of South Pasadena Community Development Department 1414 Mission Street South Pasadena, California 91030
3. Contact Person and Phone Number:	Alison Becker 626.403.7220
4. Project Location:	The approximate 2,772 acres encompassing the City of South Pasadena (see Exhibit 1)
5. Project Sponsor's Name and Address:	City of South Pasadena Community Development Department 1414 Mission Street South Pasadena, California 91030
6. General Plan Designation:	Various
7. Zoning:	Various

8. Description of the Project:

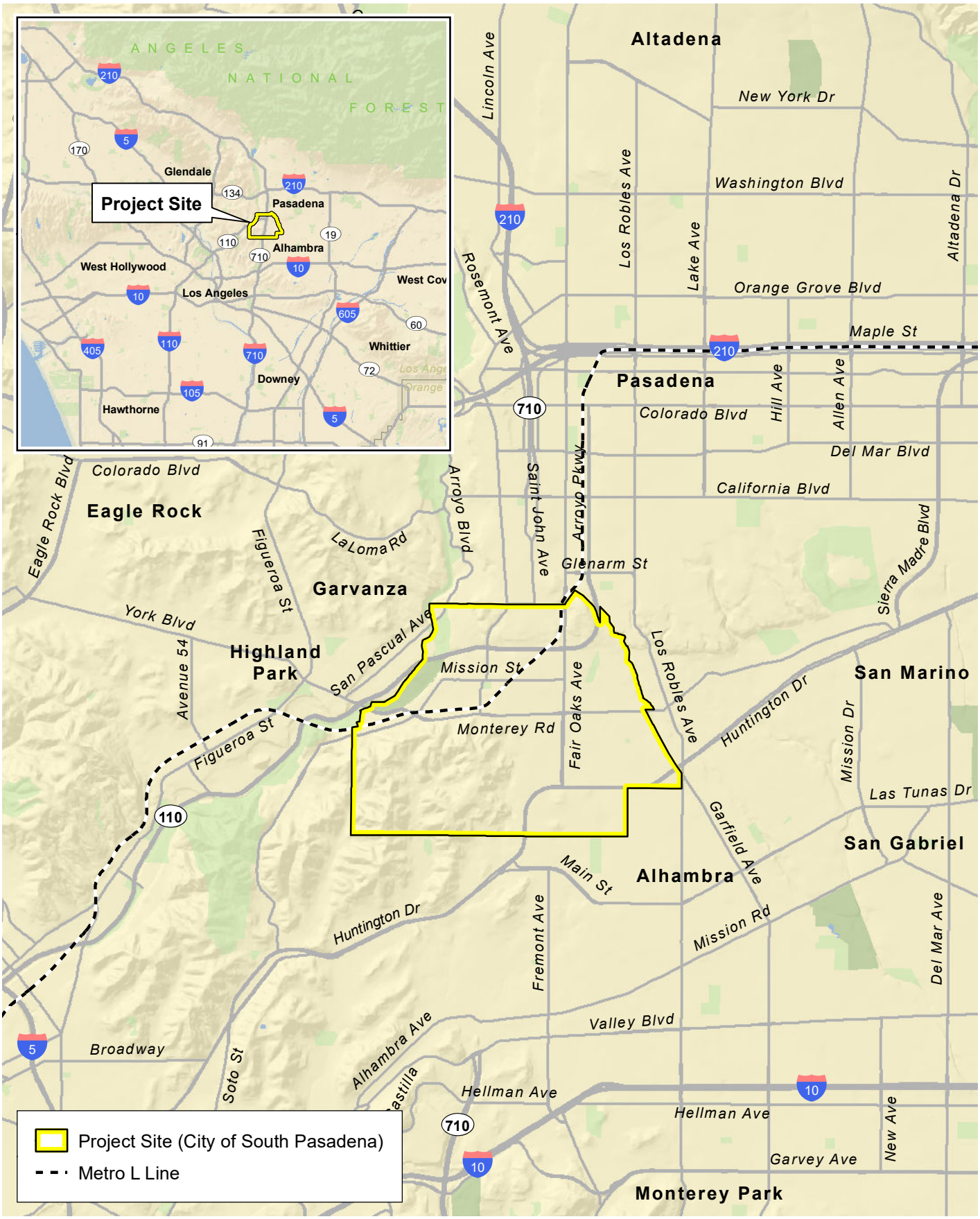
A general plan guides the physical, economic, social, and environmental well-being of a jurisdiction through establishing goals, policies, actions and/or programs for achieving the community's vision for its future. A housing element is one of the State-required general plan elements. The City of South Pasadena's (City) current General Plan, including the Housing Element, do not align with the City's vision for its future and with the need to provide housing in compliance with State law. Therefore, the City is undertaking the Project both to align goals, policies, and actions with the City's vision and respond to changing economic, environmental, legal, and social settings.

The most recent drafts of the General Plan and Downtown Specific Plan Update & 2021–2029 Housing Element, respectively, are available online at the following two sites:

- General Plan & Downtown Specific Plan Update | South Pasadena, CA (https://www.southpasadenaca.gov/government/departments/planning-and-building/general-plan-downtown-specific-plan-update);
- Housing Element Update 2021-2029 | South Pasadena, CA (https://www.southpasadenaca.gov/government/departments/planning-and-building/housing-element-update-2021-2029).

The City is the subject of a Court Order[1] to bring its Housing Element into compliance with Government Code Section 65754 within the timeframe stated within the Court Order. As part of this Court Order, pursuant to Government Code Section 65759(a), the City is required to prepare this 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). Should this Initial Study demonstrate that an action may have a significant effect on the environment, the City shall prepare an Environmental Assessment within the time limitations specified in Government Code Section 65754, the content of which substantially conforms to the

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



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Regional and Local Vicinity

Exhibit 1

South Pasadena 2021-2029 Housing Element

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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 Initial Study has been prepared in compliance with Government Code Section 65769 et. sec.

Background

All California jurisdictions are required by State law (Section 65300 of Government Code) to prepare and maintain a planning document called a General Plan. The City of South Pasadena (City) last comprehensively updated its General Plan in 1998. Since the adoption of the 1998 General Plan, several minor amendments have been adopted. The Mission Street Specific Plan (now referred to as the Downtown Specific Plan [DTSP]), part of the City's General 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. 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.

The Housing Element is one of the State-mandated elements of a General Plan. 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 of South Pasadena. SCAG finalized its Regional Housing Needs Assessment (RHNA), on March 9, 2021, and has allocated a total of 2,067 dwelling units (DUs) to the City of South Pasadena at a range of affordability levels. 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. Cities and counties are not responsible for building the target number of units, but rather are required to plan for them, by demonstrating the sufficiency of sites to accommodate the allocation and identifying specific Housing Element programs to provide capacity to meet the RHNA requirements with implementation dates, within three years. The Housing Element will not be certified by HCD if it does not demonstrate standards and programs for housing production capacity to accommodate the RHNA, including rezoning, if necessary.

Project Components

The Court Order 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 Initial Study, the NOP, and EA are 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.

General Plan and Downtown Specific Plan Update

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 (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.

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. 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 housing opportunities for all. The General Plan and DTSP Update each include eight chapters, and each of the chapters features an overriding 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 DTSP Update has an accompanying hybrid form-based code (herein referred to as DTSP Code or Code) to guide the DTSP's implementation, providing all requirements for development and land use activity with the DTSP's boundaries. Form-based codes are an alternative to conventional zoning regulations and are purposeful place-based regulations with an increased focus on the design of the public realm–the public space defined by the exterior of buildings and the surrounding streets and open space.

2021–2029 Housing Element

The 2021-2029 housing element 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 are new additions. Accordingly, the proposed Housing Element update balances strategic and targeted potential housing sites adequate to meet the RHNA allocation, AFFH concerns, and 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. Per State requirements, the City's proposed Housing Element must include the following components:

- A detailed analysis of the City's demographic, economic, and housing characteristics.
- An analysis of the barriers to producing and preserving housing.
- A review of the City's progress in implementing current housing policies and programs.
- An identification of goals, policies, and actions in addition to a full list of programs that will implement the vision of the Housing Element.

- A list of sites (Suitable Sites Inventory) that could accommodate new housing, demonstrating the City's ability to meet the quantified housing number established in the RHNA.

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 (i.e., SCAG) requirements. SCAG has determined that the City's RHNA allocation is 2,067 DUs and the HCD-required RHNA surplus is 708 DUs (2,775 DUs in total). Table 2 summarizes the 6th Cycle RHNA allocation for the City of South Pasadena that the Project accommodates.

TABLE 1
2021–2029 HOUSING ELEMENT RHNA ALLOCATION

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

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 Housing Element goals, policies, and programs are intended to support and encourage housing construction to achieve the City's RHNA allocation. The housing plan includes measurable targets that are monitored on an annual basis through HCD's Annual Progress Reporting system. The 2021-2029 Housing Element is available under a separate cover from the General Plan and DTSP Update and will be incorporated by reference in these documents.

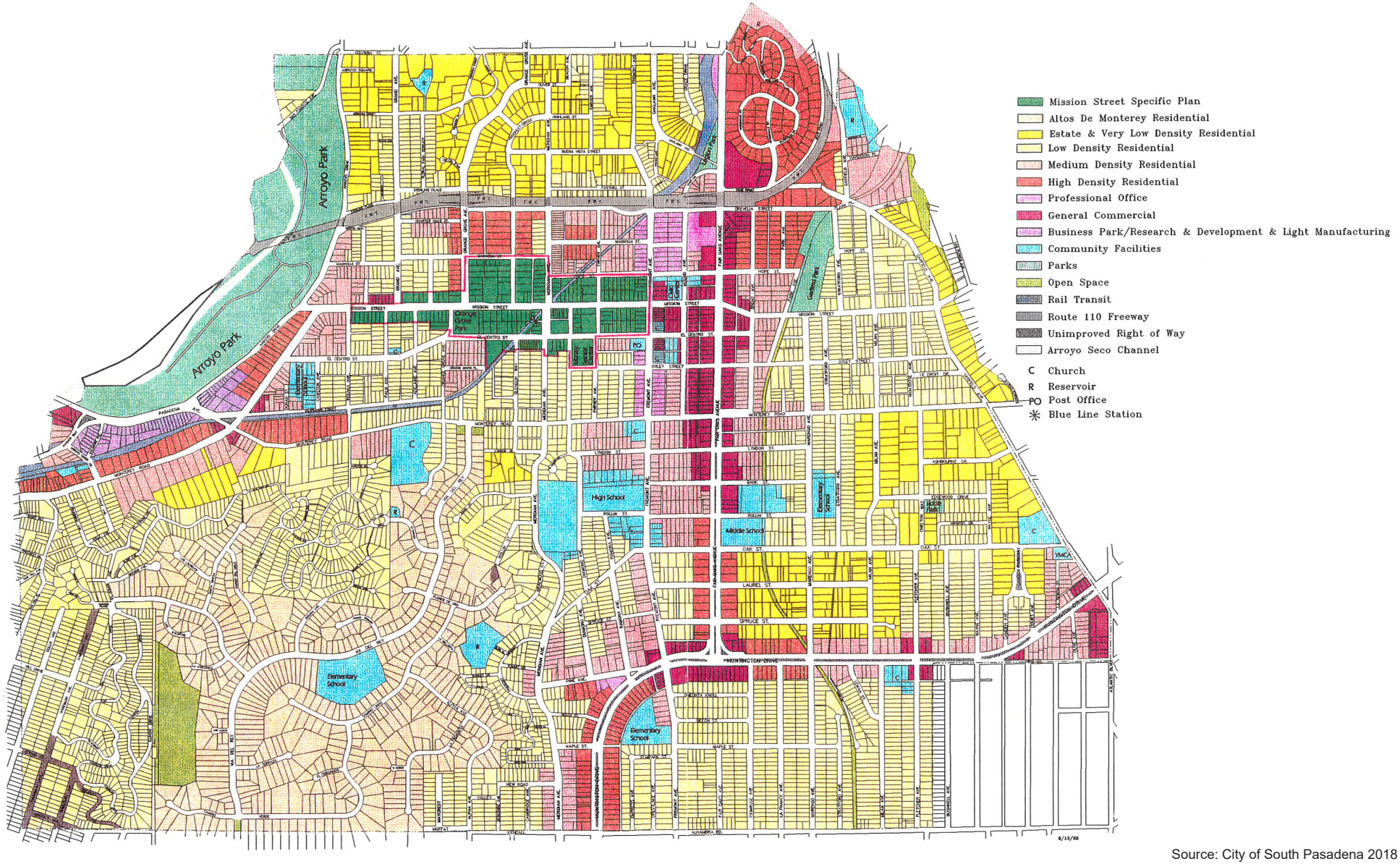
Project Development Capacity

Based on 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 neighborhoods and directing calibrated growth. Preserving housing supports sustainability objectives, and it is also less expensive to create affordable units in existing housing stock. However, to accommodate the 6th Cycle RHNA allocation, 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 plans encourage 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 accommodate increased housing opportunities within existing residential neighborhoods. Exhibit 2, Existing Land Use 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 analyzed herein would accommodate a maximum of 2,775 DUs and 430,000 square feet (sf) of non-residential uses–comprised of retail and office development–in addition to existing land uses.

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[2] and 6,882 more residents[3] in the City through 2040 compared to existing conditions. The maximum 6,882 residents equate with full occupancy of 2,775 units. However, based on a vacancy rate of 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). Vacancy rates of 5.5 percent for the City and 6.4 for the County are applied in this

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



Source: City of South Pasadena 2018

Existing Land Use Policy Map

Exhibit 2

South Pasadena 2021-2029 Housing Element

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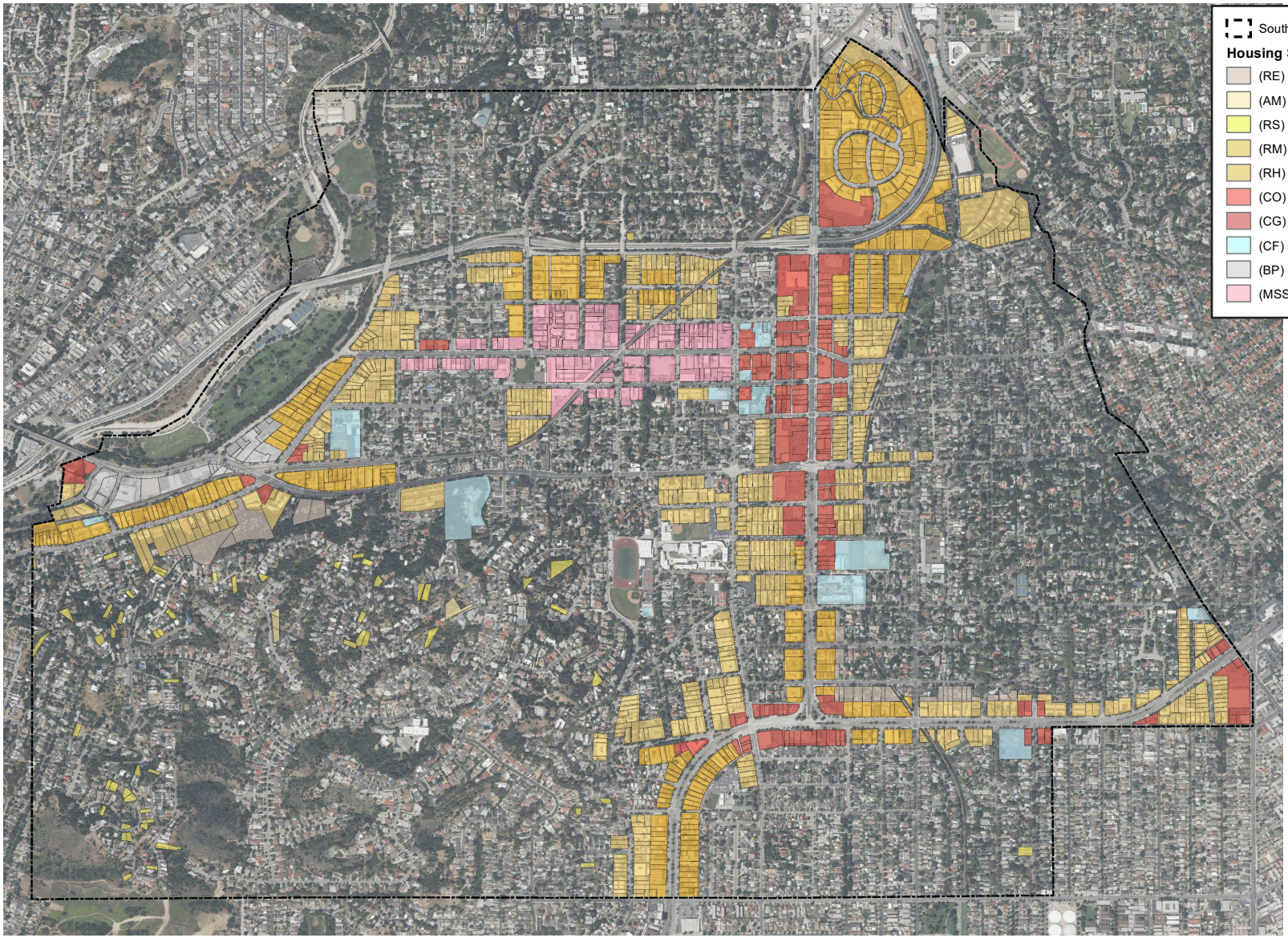

Source: City of South Pasadena 2023

Citywide Sites Inventory Map

Exhibit 3

South Pasadena 2021-2029 Housing Element

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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. 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 in the focus areas.

Discretionary Actions by the City

The primary discretionary action by the City supported by this Initial Study 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 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.

Probable Environmental Impacts of the Project

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

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

Based on the analysis presented in this Initial Study, the Project would result in no impacts or less than significant impacts related to the environmental checklist questions for the topics listed below:

- Agriculture and Forestry Resources
- Mineral Resources

9. Surrounding Land Uses 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 Project includes approximately 3.5 square miles, or 2,272 acres, within the incorporated City limits. The City's estimated 11,156 residential dwelling units (DUs), housing the City's population of 25,580, are comprised of nearly equal number of single-family and multi-family units.

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

Regional access to the City is provided predominantly by State Route 110 (SR-110, Arroyo Seco Parkway), which transects the City. Interstate 210 (I-210) and SR-134 also provide regional access, with the nearest ramps situated approximately 1 mile north of the northern City boundary. The Los Angeles County Metropolitan Transportation Authority (Metro) 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 and primary transportation corridors are shown on Exhibit 1 above.

10. Other public agencies whose approval is required:

This question is not applicable to this Initial Study, as it is being prepared pursuant to Government Code Section 65759 as part of the Court Order (see above). There are no other agencies that would use this document as part of discretionary decision-making.

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

Consultation pursuant to Section 21080.3.1 of the *Public Resources Code* and Assembly Bill (AB) 52 and Senate Bill (SB) 18 with the California Native American tribes affiliated with the City of South Pasadena has been completed. Refer to Section 2.18, Tribal Cultural Resources, of this Initial Study for further information.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL ASSESSMENT is required.	X
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EA or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Prepared By	Date	Reviewed By	Date
	05/02/23		5/2/2023
Alison Becker, AICP		Angelica Frausto-Lupo	
Printed Name		Printed Name	

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SECTION 2.0 ENVIRONMENTAL CHECKLIST FORM

2.1 AESTHETICS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐

Discussion

The City's existing General Plan defines that the "hillsides and ridgelines of South Pasadena provide a scenic backdrop for the entire community". Additionally, the San Gabriel Mountains rise to heights over 6,000 feet above msl and would be expected to remain partially visible from most areas of the City. However, the Project would result in an intensification of land uses in portions of the City including buildings on selected parcels that may be taller than 45 feet. Therefore, potential impacts related to obstructions of scenic vistas will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐

Discussion

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. However, 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 intensified land uses that abut the freeway are potentially developed. Therefore, potential impacts related to scenic resources within view of SR-110 will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?	☒	☐	☐	☐

Discussion

The City is considered an urbanized area. However, the City considers visual character of high importance separate from the issue of consistency with applicable planning regulations. The assessment of the Project impacts related to visual character would consider both the context of public views in the City as well as planning regulations.

Future development 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. Potential impacts related to visual quality will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

Discussion

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. Newly constructed buildings could also 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. Therefore, potential impacts related to light or glare will be further evaluated in the Environmental Assessment.

2.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.	**Potentially Significant Impact**	**Less than Significant with Mitigation**	**Less than Significant Impact**	**No Impact**
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

The City is a developed urban area surrounded by several municipalities that are also urbanized. The City contains no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the most recent maps prepared, pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (FMMP 2020). The City has no land zoned for agricultural use, nor is there land proposed to be zoned for agricultural use. Therefore, the Project would not impact agriculture resources. This issue will not be further evaluated in the Environmental Assessment. Accordingly, there are no conflicts with agricultural zoning, and Williamson Act contracts are not applicable to the City. Additionally, there is no forest land, timberland, or any Timberland Production Zones in the City; therefore, the Project would not result in the loss or conversion of forest land, timberland, or Timberland Production areas. Thus, agriculture and forest resources will not be further evaluated in the Environmental Assessment.

2.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐

Discussion

The City is within the South Coast Air Basin (SoCAB). On December 2, 2022, the South Coast Air Quality Management District (SCAQMD) adopted the 2022 Air Quality Management Plan (AQMP), which is a regional and multi-agency effort (SCAQMD, California Air Resources Board, Southern California Association of Governments [SCAG], and U.S. Environmental Protection Agency [USEPA]). The 2022 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy; updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts.

Short-term construction and long-term operation of the Project would result in a net increase in stationary and mobile source criteria air pollutants emissions in the SoCAB compared to the existing condition. Therefore, consistency with the 2022 AQMP will be further evaluated in the Environmental Assessment.

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

Discussion

The SoCAB is an airshed that is designated a non-attainment area for selected criteria pollutants. As stated in Threshold 2.3(a), construction and operation of the Project would result in a net increase in air pollutants. The Project's potential to result in a cumulatively considerable increase in those pollutants for which the SoCAB is in non-attainment, when considered in combination with other development planned in the SoCAB, will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐

Discussion

As stated in Threshold 2.3(a), construction and operation of the Project would result in a net increase in air pollutants. Therefore, potential impacts related to exposure of sensitive receptors to substantial pollutant concentrations will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

Discussion

According to the SCAQMD's *CEQA Air Quality Handbook,* land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Potential sources of operational odors generated by the Project would include disposal of miscellaneous commercial refuse, which occurs in the existing condition. Additionally, short-term construction equipment and activities would generate odors, such as diesel exhaust emissions from construction equipment and paving activities. Therefore, potential impacts related to odors will be further evaluated in the Environmental Assessment.

2.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐

Discussion

The Project site is in a highly urbanized area and is largely built out. As such, 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 present in the undeveloped, naturally vegetated open space areas. Additionally, Cooper's hawk (*Accipiter cooperii*) and western mastiff bat (*Eumops perotis californicus*) are special status wildlife species with potential to occur in the large trees that are located throughout the City. Therefore, potential impacts related to special status biological resources will be further evaluated in the Environmental Assessment.

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

Discussion

As discussed above in Threshold 2.4(a), the City is in a highly urbanized area. However, the Project may result in future development of vacant areas supporting native vegetation communities, potentially containing sensitive upland vegetation types. Therefore, potential impacts related to sensitive natural communities will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐

Discussion

As discussed above in Threshold 2.4(a), the Project site is in a highly urbanized area. Jurisdictional resources (i.e., under the jurisdiction of the U.S. Army Corps of Engineers, Regional Water Quality Control Boards, and/or California Department of Fish and Wildlife pursuant to the Clean Water Act) 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. However, potential impacts related to jurisdictional resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐

Discussion

Wildlife corridors and habitat linkages are features that promote habitat connectivity and are generally characterized as undisturbed canyon and riverine stream habitat areas. 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. Also, future development may involve clearing or removals of vegetation and trees used by migrating bird and bat species protected by State and/or federal regulations. Therefore, potential impacts related to wildlife movement will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐

Discussion

The City of South Pasadena has a detailed tree preservation ordinance defined under Chapter 34, "Trees and Shrubs", of the City of South Pasadena Municipal Code (SPMC). Future development may involve trimming or removals of trees. Therefore, potential impacts related to conflict with the City's tree preservation ordinance will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

Discussion

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. However, this issue will be further evaluated in the Environmental Assessment as part of the biological resources analysis.

2.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☒	☐	☐	☐

Discussion

The City has numerous designated historic resources and many additional properties that have been identified as potentially eligible historical resources. Implementation of the proposed Project would involve redevelopment of existing properties. Therefore, potential impacts to historical resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☒	☐	☐	☐

Discussion

The City is almost built out and is in a highly developed, urban area of Los Angeles County. Because there are few vacant parcels in the City, future development would largely occur in areas of the City that are already developed and/or built out. 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. Therefore, potential impacts to archaeological resources will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐

Discussion

As discussed under Threshold 2.5(b) above, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation than in the past, may encounter unknown cultural resources, including previously undiscovered human remains, resulting in a potentially significant impact. Therefore, potential impacts to human remains will be further evaluated in the Environmental Assessment.

2.6 ENERGY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐

Discussion

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

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

Discussion

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

2.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐

Discussion

The numerous faults in Southern California include active, potentially active, and inactive faults. The criteria for these major groups are based on criteria developed by the California Geological Survey (CGS) for the Alquist-Priolo Earthquake Fault Zone Program. An active fault is defined as one that has had surface displacement within Holocene time (about the last 11,700 years). A potentially active fault has demonstrated surface displacement during Quaternary time (approximately the last 1.6 million years) but has had no known Holocene movement. Faults that have not moved in the last 1.6 million years are considered inactive. The County of Los Angeles and the City of South Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones (Alquist-Priolo Zones). Specifically, the limits of the Alquist-Priolo Zone for the Raymond Fault run east-west through the northernmost portion of the City, largely overlying the SR 110 alignment. Therefore, potential impacts related to the surface fault rupture will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☒	☐	☐	☐
ii) Strong seismic ground shaking?				

Discussion

The Project site is located in the seismically active southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active or potentially active faults. Also, several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin. Consistent with its location in a seismically active region, the City may be subject to strong ground shaking resulting from a major earthquake on one or

more faults in the area in the future. Therefore, potential impacts related to strong seismic ground shaking will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	☒	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?				
iv) Landslides?	☒	☐	☐	☐

Discussion

Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Separate from the issue of liquefaction, the presence of groundwater or shallow, perched water or seepage can adversely affect new construction. Landslides typically consist of shallow failures involving surficial soils and the underlying highly weathered bedrock in moderate to steep terrain. The CGS broadly identifies areas of seismic-induced liquefaction 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. Therefore, potential impacts related to liquefaction and landslides will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐

Discussion

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. Therefore, potential impacts related to soil erosion will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☒	☐	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐	☐

Discussion

Secondary seismic hazards related to the underlying geologic unit include several types of ground failure that can occur because of severe ground shaking. These hazards include landslides, collapse, ground lurching, shallow ground rupture, and liquefaction. Liquefaction and landslides are addressed above under Thresholds 2.7(a)(iii) and 2.7(a)(iv). The probability for each type of ground failure depends on the severity of the earthquake, the site's distance from the fault, the local topography, and subsoil and groundwater conditions, among other factors. In addition, there can be soil engineering characteristics inherent in the underlying sediments on a site that can adversely affect structures if not appropriately managed during construction, including expansive soils, subsidence, hydroconsolidation, and other forms of collapse. Therefore, potential impacts related to location on an unstable geologic unit will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☒	☐	☐	☐

Discussion

The vast majority of the City is served by the municipal sewer system; however, there are septic tanks that remain in the Altos de Monterey area in the southwest portion of the City. Therefore, potential impacts related to alternative wastewater systems will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Discussion

Future development would largely occur in areas of the City that are already developed and/or built out. However, as with archaeological resources, grading and construction activities in undeveloped areas, or redevelopment that requires deeper or more extensive soil excavation into the native soil than in the past, could potentially cause the disturbance of previously unknown paleontological resources. Therefore, potential impacts related to archaeological resources will be further evaluated in the Environmental Assessment.

2.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐

Discussion

The Project would result in a net increase in the generation of greenhouse gas (GHG) emissions associated with construction and operation of future development in the City. The Project's short-term and long-term GHG emissions will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Discussion

As discussed in Threshold 2.8(a), the Project would result in increased GHG emissions. The Project's consistency with applicable plans and policies related to reduction of GHG emissions,

including the City of South Pasadena's *Climate Action Plan*, will be further evaluated in the Environmental Assessment.

2.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐

Discussion

Construction activities associated with new development 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 may involve use of common hazardous materials (e.g., paint, pesticides, cleansers, and solvents). 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. Therefore, potential impacts related to the transport, use, or disposal of hazardous materials will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐

Discussion

As discussed under Threshold 2.9(a), future development could involve the use of chemical agents, solvents, paints, fuel for equipment, and other hazardous materials that are associated with construction. 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. 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, potential impacts related to hazardous materials release will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	☒	☐	☐	☐

Discussion

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. While these materials would not be considered acutely hazardous or unusual, potential impacts to existing schools due to hazardous emissions or handling of hazardous materials at future development sites will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐

Discussion

Based on review of the Cortese List data resources, there are a total of 18 (17 with status completed–case closed; 1 with status open, eligible for closure) sites in the City identified on the list of leaking underground storage tank (LUST) sites from the State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2023). The LUST sites are concentrated along Fair Oaks Avenue, Mission Street, and Huntington Drive. 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). While these findings are typical of urban environments, potential impacts related to sites identified on hazardous materials databases will be further evaluated in the Environmental Assessment.

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

Discussion

The Project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest 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. However, this issue will be further evaluated in the Environmental Assessment as part of the hazards and hazardous materials analysis.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐

Discussion

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 SR 110 and I 210 freeways serving as primary regional exit routes. Construction activities on public rights-of-way may temporarily block traffic and access near the construction zone. The potential impacts related to emergency response and evacuation will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☒	☐	☐	☐

Discussion

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. Therefore, potential impacts related to wildland fires will be further evaluated in the Environmental Assessment.

2.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☒	☐	☐	☐

Discussion

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. 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. Future development would have the potential to increase non-point-source runoff, and associated pollutants, from residential, office/retail, utility, and roadway uses. Therefore, potential impacts related to water quality will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐

Discussion

A project can result in a significant impact on groundwater supplies if it causes a demonstrable and sustained reduction of groundwater recharge capacity or changes the potable water levels such that it reduces the ability of a water utility to use the groundwater basin for public water

supplies or storage of imported water, reduces the yields of adjacent wells or well fields, or adversely changes the rate or direction of groundwater flow. The Project would result in a net increase in potable water demand for indoor and outdoor use. Additionally, a finite amount of water would be used during construction for dust suppression. These water supplies may be in part derived from the City's groundwater sources. Therefore, potential impacts related to groundwater supplies and groundwater recharge will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:	☒	☐	☐	☐
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 off-site?	☒	☐	☐	☐
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?	☒	☐	☐	☐
iv) Impede or redirect flood flows?	☒	☐	☐	☐

Discussion

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. However, 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. Therefore, potential impacts related to alteration in drainage patterns will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☒	☐	☐	☐

Discussion

No portions of the City are within a 100-year floodplain, as identified by the Federal Emergency Management Agency (FEMA 2023). Due to distance from the Pacific Ocean and absence of large

water bodies in or near the City, tsunamis or seiches would not affect the City. However, mountainous areas are susceptible to mudflows. Most of the City is relatively flat, with steeper hillside areas primarily in the southwest portion of the City. Therefore, the potential impacts related to inundation from mudflows will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

Discussion

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 2.10(b) above, the Project would result in an increased demand for water during construction and operation of future development, which may be in part derived from the City's groundwater sources. Therefore, potential impacts related to groundwater management will be further evaluated in the Environmental Assessment.

2.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☒	☐	☐	☐

Discussion

The City of South Pasadena is largely built out with established residential neighborhoods and commercial corridors. While this fact has contributed to difficulty in the City finding a feasible way to accommodate the high RHNA allocation, the focus of the 2021–2029 Housing Element is to conserve the stable and established neighborhoods and direct carefully calibrated growth. The planned development and redevelopment are meant to revitalize neighborhoods, rather than divide them, and would enable more residential development or mixed-use development (i.e., residential and commercial/office) than presently allowed. Regardless, potential impacts related to dividing an established community will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

Discussion

The primary land use planning documents that govern the City include the City's General Plan, Mission Street Specific Plan, and South Pasadena Municipal Code. Additionally, the SCAG's RHNA and RTP/SCS are regional planning documents relevant to the City's local planning, including the 2021–2029 Housing Element. Consistency with the applicable plans and policies of the City and the region (i.e., SCAG) will be further evaluated in the Environmental Assessment.

2.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

There are no known mineral resources or active mining operations in the City. Therefore, the proposed Project would not result in the loss of an available known mineral resource with value to the region. There will be no impact, and no mitigation is required. Therefore, mineral resources will not be further evaluated in the Environmental Assessment.

2.13 NOISE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐

Discussion

The Project would generate noise from construction activity and operational mobile (e.g., cars, trucks, ambulances) and stationary noise sources (e.g., idling vehicles and heating, ventilating, and air conditioning ([HVAC] equipment) associated with future development. Therefore, potential impacts related to noise generation will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

Discussion

Depending on the type of construction activities employed, construction activities could generate groundborne vibration that could affect nearby buildings. Therefore, potential impacts related to generation of vibration will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☒	☐	☐	☐

Discussion

The Project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest 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. However, this issue will be further evaluated in the Environmental Assessment as part of the noise analysis.

2.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?	☒	☐	☐	☐

Discussion

Future development under the proposed Project would increase housing, population, and employment in the City. While buildout of a City under an adopted general plan, including its housing element, is not tied to a specific timeline, for the purposes of this Initial Study, development of the Project is assumed to occur by the horizon year of 2040 with the policies and associated programs of the 2021–2029 Housing Element being completed by the end of 2029. Therefore, potential impacts related to the direct and indirect generation of population in the City will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☒	☐	☐	☐

Discussion

The 2021–2029 Housing Element calls for the conservation of the City's established residential neighborhoods and transitions to higher densities within focused 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 with potential for redevelopment that currently contain residential land uses could result in displacement. Therefore, potential impacts related to displacement of existing people or housing will be further evaluated in the Environmental Assessment.

2.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i) Fire protection?	☒	☐	☐	☐
ii) Police protection?	☒	☐	☐	☐
iii) Schools?	☒	☐	☐	☐
iv) Parks?	☒	☐	☐	☐
v) Other public facilities?	☒	☐	☐	☐

Discussion

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. There would be increased demand for fire protection and police protection services related to both the increased population and the increased scope of development. The Project's resident population would also generate an increased demand for parks, schools, and other public facilities, such as libraries. The increased demand for these public services may result in the need for new or expanded facilities whose construction could result in environmental impacts. Therefore, potential impacts related to public services will be further evaluated in the Environmental Assessment.

2.16 RECREATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐

Discussion

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. The Project's resident population would generate an increased demand for recreational facilities in the City and local region. The increased demand for these recreational facilities may result in the deterioration of these facilities. Therefore, potential impacts related to increased use of recreational facilities will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☒	☐	☐	☐

Discussion

As discussed in Section 2.14, Population and Housing, above, the Project would result in direct population growth in the City. There would be increased demand for recreational facilities related to both the increased population and the increased scope of development. The increased demand for recreation facilities may result in the need for expanded recreational facilities whose construction could result in environmental impacts. Therefore, potential impacts related to the demand for recreational facilities will be further evaluated in the Environmental Assessment.

2.17 TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐

Discussion

The City adopted CEQA transportation analysis guidelines on May 20, 2020 (Resolution No. 7656), pursuant to SB 743. 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 Vehicle Miles Traveled (VMT). The total VMT of the land use plan area will be divided by population (per capita) and service population (population plus employees). A significant impact would occur if the VMT per capita or service population for the land use plan exceeds the VMT per population or service population of the baseline. A cumulative significant impact would be the same as the project-level impact since the analysis includes all regional land use and transportation cumulative conditions. The Project would generate increased vehicle trips and associated vehicle miles. Therefore, consistency of the Project with the City's plans, ordinances, and policies addressing the circulation system, specifically the City's General Plan and the City's transportation analysis guidelines will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	☒	☐	☐	☐

Discussion

Section 15064.3(b)(1) of the State CEQA Guidelines refers to evaluating transportation impacts using the VMT metric for land use projects. As discussed above, the City's transportation analysis guidelines were prepared to reflect the requirements of SB 743, and potential impacts related to additional increased vehicle trips and associated vehicle miles will be presented for further evaluation in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐

Discussion

Roadway and other transportation improvements that may be implemented in the future would involve only existing streets, ramps, driveways, and sidewalks. No new major streets or other substantial alterations to the existing roadway network could be accommodated as the City is essentially built out. 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. Therefore, potential impacts related to traffic hazards will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Result in inadequate emergency access?	☒	☐	☐	☐

Discussion

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 SR 110 and I 210 freeways serving as primary regional exit routes. The Project would result in a greater intensity of land uses on some parcels in the City. Construction activities on public rights-of-way may temporarily block traffic and access near the construction zone. Therefore, potential impacts related to emergency access will be further evaluated in the Environmental Assessment.

2.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐	☐

Discussion

The Project is subject to compliance with Assembly Bill (AB) 52, which requires consideration of impacts to "tribal cultural resources", defined in Section 21074 of the *Public Resources Code,* as part of the CEQA process. AB 52 requires the City to notify any groups (who have requested notification) who are traditionally or culturally affiliated with the geographic area of a project for which a Negative Declaration, Mitigated Negative Declaration, or an EIR is required pursuant to CEQA, on or after July 1, 2015. Senate Bill (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.

Pursuant to AB 52 and SB 18, the City initiated government-to-government consultation with NAHC-identified California Native American tribes has been completed as part of ongoing preparation of the Program Environmental Impact Report (PEIR) for the General Plan and DTSP Update & 2021–2029 Housing Element. Tribes requested consultation to identify, protect, and/or mitigate potential impacts to cultural places/resources. The results of this consultation and the potential for the Project to cause a substantial adverse change to a listed or eligible tribal cultural resource will be further evaluated in the Environmental Assessment.

2.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐

Discussion

The Project would increase demand for potable water, electricity, natural gas, and telecommunications services and would increase the generation of wastewater. As discussed in Section 2.10, Hydrology and Water Quality, 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. Therefore, potential impacts related to the need for new or expanded water, wastewater, storm water drainage, and dry utilities whose construction could result in environmental impacts will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐

Discussion

The Project would result in a net increase in potable water demand for indoor and outdoor use. Additionally, a finite amount of water would be used during construction for dust suppression. Therefore, potential impacts related to the sufficiency of water supplies will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐

Discussion

The Project would increase the generation of wastewater. Wastewater from the City of South Pasadena is treated by the Sanitation Districts of Los Angeles County (Sanitation Districts). Potential impacts to Sanitation Districts' facilities from the Project will be further evaluated in the Environmental Assessment.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

Discussion

Construction of the Project would generate a finite volume of construction and demolition waste, and operation of the Project would result in increased long-term generation of municipal (non-hazardous) solid waste. Potential impacts related to landfill space and compliance with applicable solid waste regulations will be further evaluated in the Environmental Assessment.

2.20 WILDFIRE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☒	☐	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☒	☐	☐	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☒	☐	☐	☐

Discussion

No portion of the City is identified by the California Department of Forestry and Fire Protection as a (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. Therefore, potential impacts related to wildfires will be further evaluated in the Environmental Assessment.

2.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐

Discussion

As discussed in Section 2.4, Biological Resources, the potential for the Project to impact special status biological resources, sensitive vegetation types, jurisdictional resources, wildlife movement, and conflict with the City's tree preservation ordinance or conservation plans will be further evaluated in the Environmental Assessment.

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

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐

Discussion

Within the City of South Pasadena and San Gabriel Valley, there are planned, ongoing, and proposed projects (not including the Project) that may cumulatively increase environmental impacts in the Project area. These impacts may be potentially significant and will be further evaluated in the Environmental Assessment. The Environmental Assessment will evaluate cumulative impacts for the Project based on the environmental impacts of the development associated with the Project in combination with the potential environmental impacts of regional growth in the San Gabriel Valley through the year 2040.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
Would the project:				
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Discussion

Construction and operation of the Project could have the potential to generate significant adverse impacts on human beings, either directly or indirectly. The Environmental Assessment will provide analyses of the potential impacts related to 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, utility and service systems, and wildfire.

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SECTION 3.0 REFERENCES

California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP). 2020 (November). *Los Angeles County Important Farmland 2018: Sheet 2 of 2*. Sacramento, CA: FMMP. https://filerequest.conservation.ca.gov/RequestFile/2819428.

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

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

California Department of Water Resources (DWR). 2023 (April 25, access date). *Basin Prioritization: SGMA Basin Prioritization Dashboard*. Sacramento, CA: DWR. https://gis.water.ca.gov/app/bp-dashboard/final/.

Federal Emergency Management Agency (FEMA). 2023 (April 25, access date). The National Flood Insurance Program, FEMA Flood Map Service Center: South Pasadena, City of. Washington, D.C.: FEMA. https://msc.fema.gov/portal/search.

South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. Diamond Bar, CA: SCAQMD.

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