

ATTACHMENT F

Our Pasadena – Putting the Plan in Motion
Central District Specific Plan Update

**Addendum to the
Pasadena General Plan
Environmental Impact Report**

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Acronyms and Abbreviations

AB	Assembly Bill
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CDSP	Central District Specific Plan
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CG	General Commercial
Checklist	Environmental Checklist Form
City	City of Pasadena
CL	Limited Commercial
CMP	Congestion Management Program
du/ac	dwelling unit per acre
EIR	Environmental Impact Report
FAR	floor area ratio
FTA	Federal Transit Administration
GHG	greenhouse gas
GP EIR	2015 Pasadena General Plan Environmental Impact Report
HRA	health risk assessment
I-210	Interstate 210
IS	Initial Study
LOS	level of service
LTS	Less than Significant Impact
LTS-M	Less than Significant Impact with Mitigation
MBTA	Migratory Bird Treaty Act
MERV	Maximum efficiency rating value
MMRP	Mitigation Monitoring and Reporting Program
MU	Mixed Use
NAAQS	National Ambient Air Quality Standards
NI	No Impact
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
PFD	Pasadena Fire Department
PM _{2.5}	fine particulate matter 2.5 microns or less in diameter
PM ₁₀	respirable particulate matter ten microns or less in diameter
PPD	Pasadena Police Department
PPL	Pasadena Public Library
PUSD	Pasadena Unified School District
PWP	Pasadena Department of Water and Power
RCRA	Resource Conservation and Recovery Act
RM	Multifamily Residential
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District

SOC	Statement of Overriding Considerations
S-U	Significant and Unavoidable Impact
T-BACTs	best available control technologies for toxics
TACs	toxic air contaminants
TDF	Travel Demand Forecasting
VMT	vehicle miles traveled
VOC	volatile organic compound
VT	vehicles traveled

CHAPTER 1

PURPOSE AND BACKGROUND

The City of Pasadena (City) has prepared this Addendum to the 2015 Pasadena General Plan Environmental Impact Report (GP EIR) (State Clearinghouse No. 2013091009) to address the potential site-specific environmental impacts associated with the update to the Central District Specific Plan (proposed project or project). This Addendum is prepared in accordance with the California Environmental Quality Act of 1970 (CEQA) (Cal. Public Resources Code Section 21000, *et. seq.*, as amended) and its implementing guidelines (Cal. Code Regs., Title 14, Section 15000 *et. seq.*, 2016). This Addendum has been prepared and will be processed consistent with CEQA Guidelines (Cal. Code Regs., Title 14, Section 15162 and Section 15164).

In 2015, the City updated the Pasadena General Plan and prepared the GP EIR to analyze potential citywide impacts, broad policy alternatives, and programmatic mitigation measures associated with the update of the Pasadena General Plan and specific plan amendments, which updated development caps within each specific plan area. The changes focused on the Land Use and Mobility Elements and the Land Use Diagram. The update also included the consolidation of optional elements into required elements of the General Plan. The Land Use and Mobility Elements, together with the other General Plan elements, guide the overall physical development of the City through horizon year 2035. The GP EIR is a Program EIR as defined by CEQA Guidelines Section 15161, California Code of Regulations, Title 14, Division 6, Chapter 3 and prepared in compliance with CEQA Guidelines Section 15168. The Final GP EIR was certified and the findings, Statement of Overriding Considerations (SOC), and Mitigation Monitoring and Reporting Program (MMRP) adopted by the City Council on August 18, 2015 (Resolution No. 9451).

Following the adoption of the General Plan Update and certification of the GP EIR, future discretionary actions include specific plan updates and amendments and zone changes to provide consistency with the General Plan. Therefore, the City is updating seven existing specific plans and creating one new specific plan to align with and implement the updated General Plan. The specific plan updates focus on establishing neighborhood-specific design and land-use goals resulting in new development standards and guidelines that will help shape the City's major commercial and mixed-use areas. The Central District Specific Plan (CDSP) is one of the seven existing specific plans to be updated as part of the General Plan Implementation Program.

Per the GP EIR, future discretionary review may rely on analysis provided in the GP EIR for the purpose of tiering and/or streamlining. The purpose of tiering is to use the analysis of general matters contained in a broader EIR (such as the GP EIR) with later CEQA documents on narrower or more site-specific projects (CEQA Guidelines Section 15152). Tiering serves to reduce repetitive analysis and provide subsequent site-specific analysis at a time when it is meaningful. Tiering is common and appropriate when the sequence of analysis is from a General Plan EIR to a program of lesser scope, such as a specific plan (CEQA Guidelines Section 15152[b]). Therefore, CEQA review required for the City's eight specific plan areas may tier from the GP EIR pursuant to CEQA Guidelines Section 15152.

1.1 Applicability and Use of an Addendum

Per the GP EIR, CEQA review required for the City's specific plan areas may tier from the GP EIR pursuant to CEQA Guidelines Section 15152. In addition, per CEQA Guidelines Section 15152(h), other methods to streamline the environmental review process also exist. These methods include the use of a Program EIR (i.e., GP EIR) for later activities (CEQA Guidelines Section 15168) and preparing an addendum (CEQA Guidelines Section 15164). Lead agencies have discretion regarding which method may apply and should be used.

Under the process described in CEQA Guidelines Section 15168(c), later activities in the program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared. No additional documentation is required for subsequent proposed actions (e.g., updating of the City's specific plans to implement the General Plan) if the examination determines that the potential impacts were within the scope of the GP EIR, and subsequent proposed actions implement appropriate feasible mitigation measures identified in the MMRP that accompanies the Final EIR. Whether a later activity is within the scope of a Program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that a lead agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts and covered infrastructure as described in the Program EIR. If the agency finds that pursuant to CEQA Guidelines Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

The conditions in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR are:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant

effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or

- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Pursuant to CEQA Guidelines Section 15164, the City, as the lead agency, has prepared this Addendum to confirm that none of the conditions identified in CEQA Guidelines Section 15162 and Public Resources Code Section 21166(c) have been triggered. For a proposed modified project or implementing activity, CEQA Guidelines Section 15164 provides that an Addendum to a previously certified Final EIR may be prepared if only minor technical changes or additions are necessary, or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. The City must consider the whole of the data presented in the GP EIR with the information provided in this Addendum and the previously adopted MMRP.

1.2 Format of This Addendum

The previously certified GP EIR serves as the primary environmental compliance document for the project, and this Addendum provides minor changes and additions to the GP EIR. This Addendum should be considered with the full text of the previously certified 2015 GP EIR. All applicable mitigation measures from the GP EIR would be applicable to the proposed project and, therefore, are incorporated by reference into this Addendum. This Addendum relies on the use of an Environmental Checklist Form (Checklist), as suggested in Section 15063(d)(3) of the CEQA Guidelines. Per the CEQA Guidelines, an addendum does not need to be circulated for public review but can be included in or attached to the Final EIR prior to making a decision on the project.

1.3 Summary of Findings

Based upon the Checklist prepared for the proposed project and supporting responses (see Chapter 3), adoption of the update to the CDSP would not result in substantial changes requiring major revisions to the previously certified GP EIR. Further, the proposed project would not result in any new significant environmental impacts that were not discussed in the GP EIR or a substantial increase in the severity of previously identified significant impacts. No new mitigation measures are required for the proposed project. Since only minor changes and additions are required to the GP EIR, and none of the conditions described in Public Resources Code Section 21166 or CEQA Guidelines Section 15162(a-b) or Section 15163 requiring preparation of a subsequent or supplemental EIR have occurred, the City finds that the preparation of an addendum to the GP EIR is the appropriate CEQA documentation for the proposed project and that the proposed project is within the scope of the GP EIR.

1.4 Lead Agency and Discretionary Approvals

This Addendum and the previously certified GP EIR are intended to serve as the environmental documentation for the changes being proposed under the CDSP Update. The City of Pasadena is the lead agency under CEQA and maintains authority to approve the

Addendum for the adoption of the CDSP Update. Discretionary approvals being sought as part of the CDSP Update include the following:

- Acknowledgement of this Addendum to the GP EIR and that no subsequent CEQA document is required;
- General Plan Land Use Map amendment to update the land use categories depicted on the Land Use Diagram as proposed in the CDSP Update. This amendment would also update the Land Use Diagram to reflect the recommended CDSP boundary;
- General Plan text amendment to align the plan boundary indicated on the General Plan Land Use Element with the boundary proposed for the CDSP area. Under this amendment, some parcels would be removed from the CDSP area, while others would be added;
- Specific Plan Amendment for the CDSP Update;
- Zoning Map amendment to replace zoning district designations indicated on the Zoning Map with the proposed CDSP zoning districts and subareas, and zoning assignment of parcels that are proposed additions to the plan area;
- Zoning Code text amendment to replace existing permitted uses and standards in the Zoning Code with the uses and standards proposed in the CDSP to implement the plan;
- Zoning Code Amendment to incorporate a new CDSP ordinance to regulate zoning consistent with the General Plan, replacing the existing Pasadena Municipal Code Chapter 17.30;
- Other minor technical updates needed for implementation of the CDSP Update; and
- Zoning Code Text amendment to include technical changes in the previously adopted Lincoln Avenue, East Colorado, and South Fair Oaks Specific Plan for internal consistency.

CHAPTER 2 PROJECT DESCRIPTION

2.1 Introduction

On August 18, 2015, the City certified the Pasadena General Plan (GP) Final Environmental Impact Report (GP EIR). The GP EIR analyzed potential citywide impacts, broad policy alternatives, and programmatic mitigation measures. The GP EIR analyzed the update of the GP and specific plan amendments, which were limited to specific plan boundary changes and updated development caps within each of the City's eight specific plan areas. The changes focused on the Land Use and Mobility Elements and the Land Use Diagram. The update also included the consolidation of optional elements into required elements of the General Plan. The Land Use and Mobility Elements, together with the other General Plan elements, guide the overall physical development of the City through horizon year 2035.

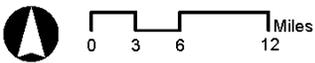
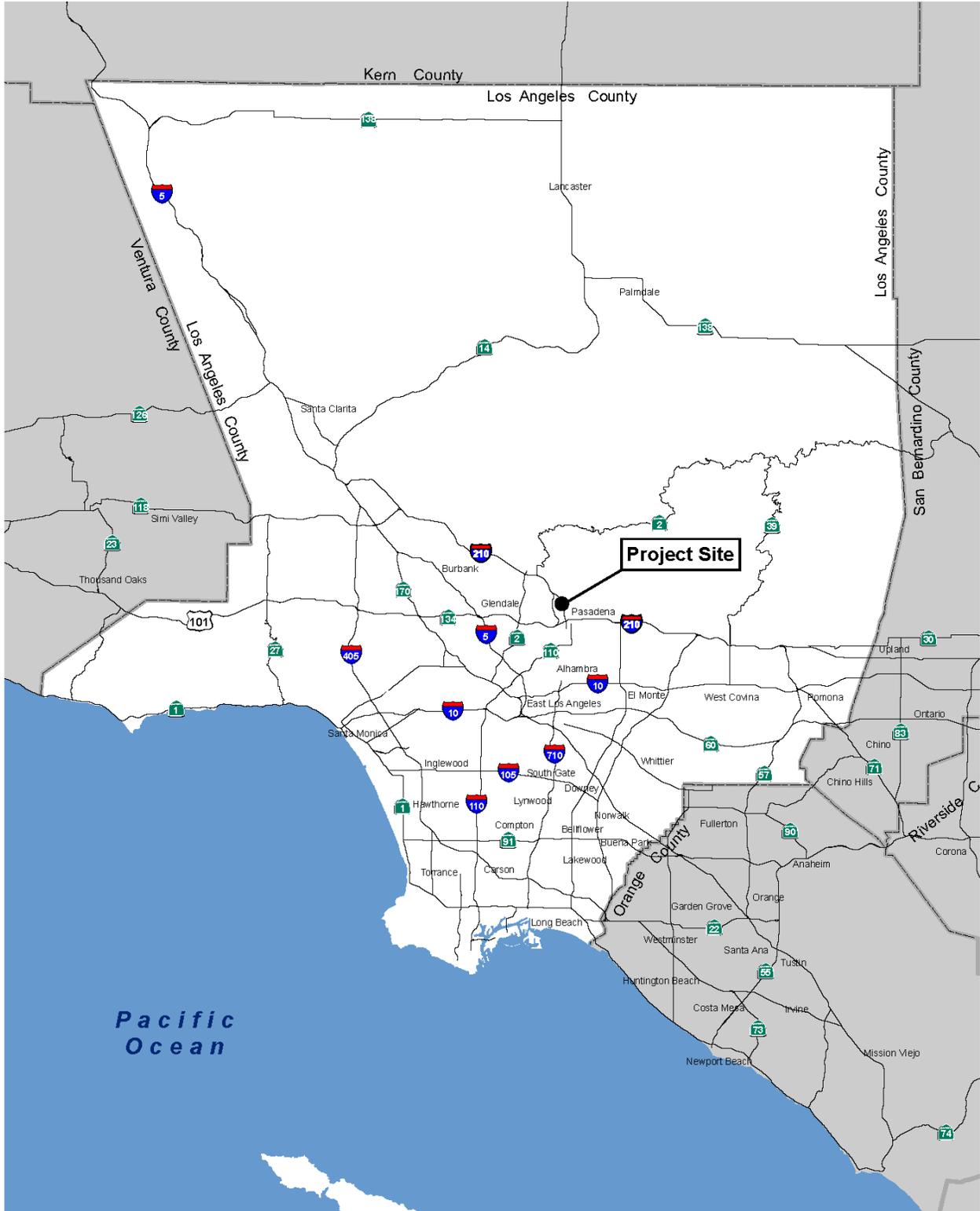
The City is updating seven existing specific plans and creating one new specific plan to align with the adopted 2015 General Plan. The specific plan updates focus on establishing neighborhood-specific design and land-use goals resulting in new development standards and guidelines that will help shape the City's major commercial and mixed-use areas. The Central District Specific Plan (CDSP) is one of the seven existing specific plans to be updated as part of the General Plan Implementation Program.

The purpose of this Addendum to the GP EIR is to evaluate the environmental effects associated with the proposed CDSP Update and to determine whether these impacts are consistent with the evaluation presented in the GP EIR in compliance with CEQA (Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

2.2 Project Location

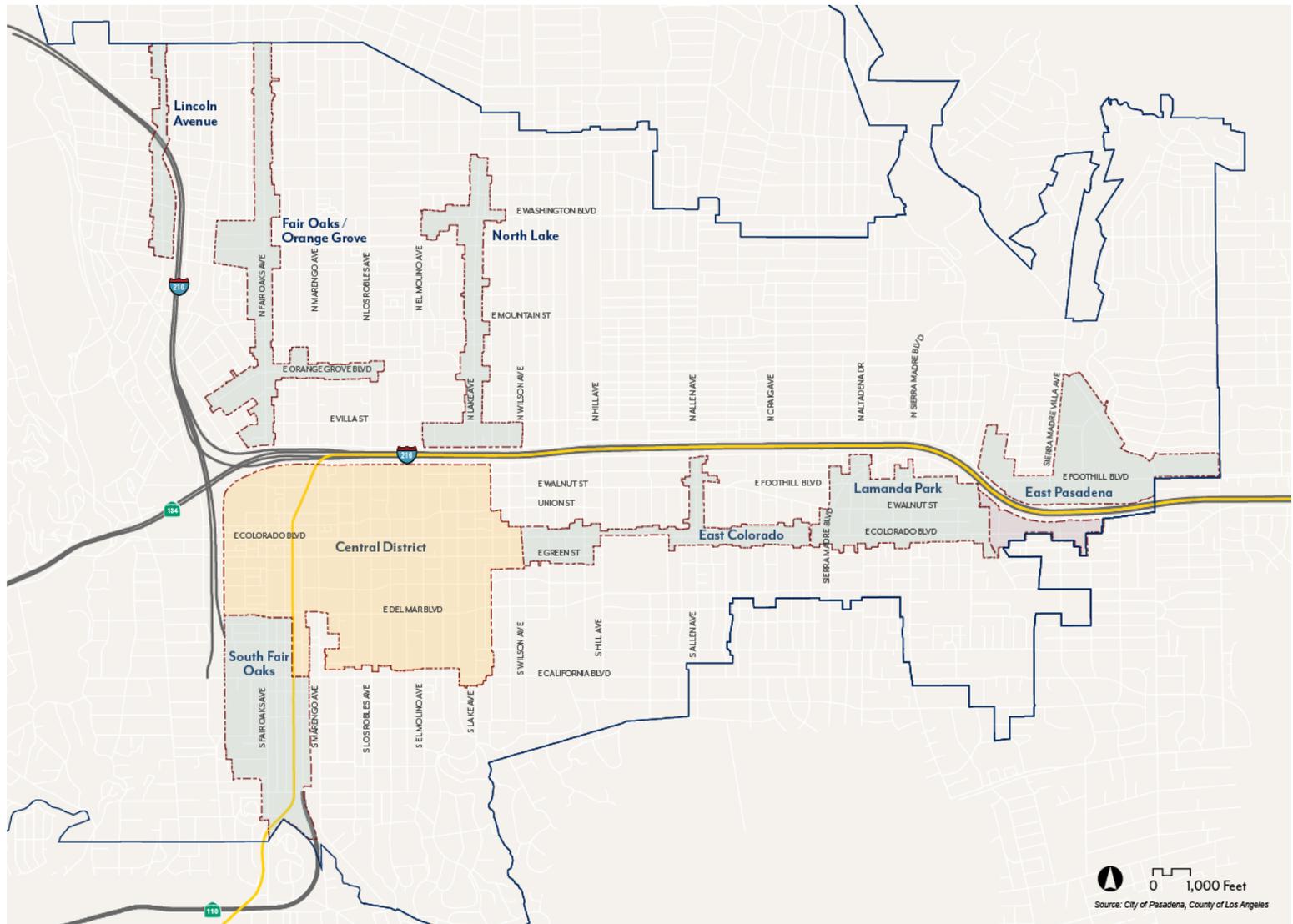
The proposed CDSP area is generally bounded by Corson Street and the I-210 Freeway to the north, Pasadena Avenue and the I-710 Freeway to the west, and Mentor/Wilson Avenues to the east. West of the Metro A Line right of way, the CDSP area meets the South Fair Oaks Specific Plan area at Del Mar Boulevard, while east of the Metro right of way, the CDSP area extends south of Del Mar Boulevard. At its far eastern boundary, the CDSP area meets the East Colorado Specific Plan area at Wilson Avenue.

Figure 1 shows the general location of the existing CDSP area within the region. Figure 2 shows the CDSP Update area among the general locations of the City's eight Specific Plans that make up the General Plan Implementation Program. Figure 3 shows the proposed CDSP Update area.



Source: City of Pasadena, County of Los Angeles

Figure 1 – Regional Location Map



*Specific Plan Boundaries are Subject to Change

Figure 2 – Pasadena's Eight Specific Plan Update Areas

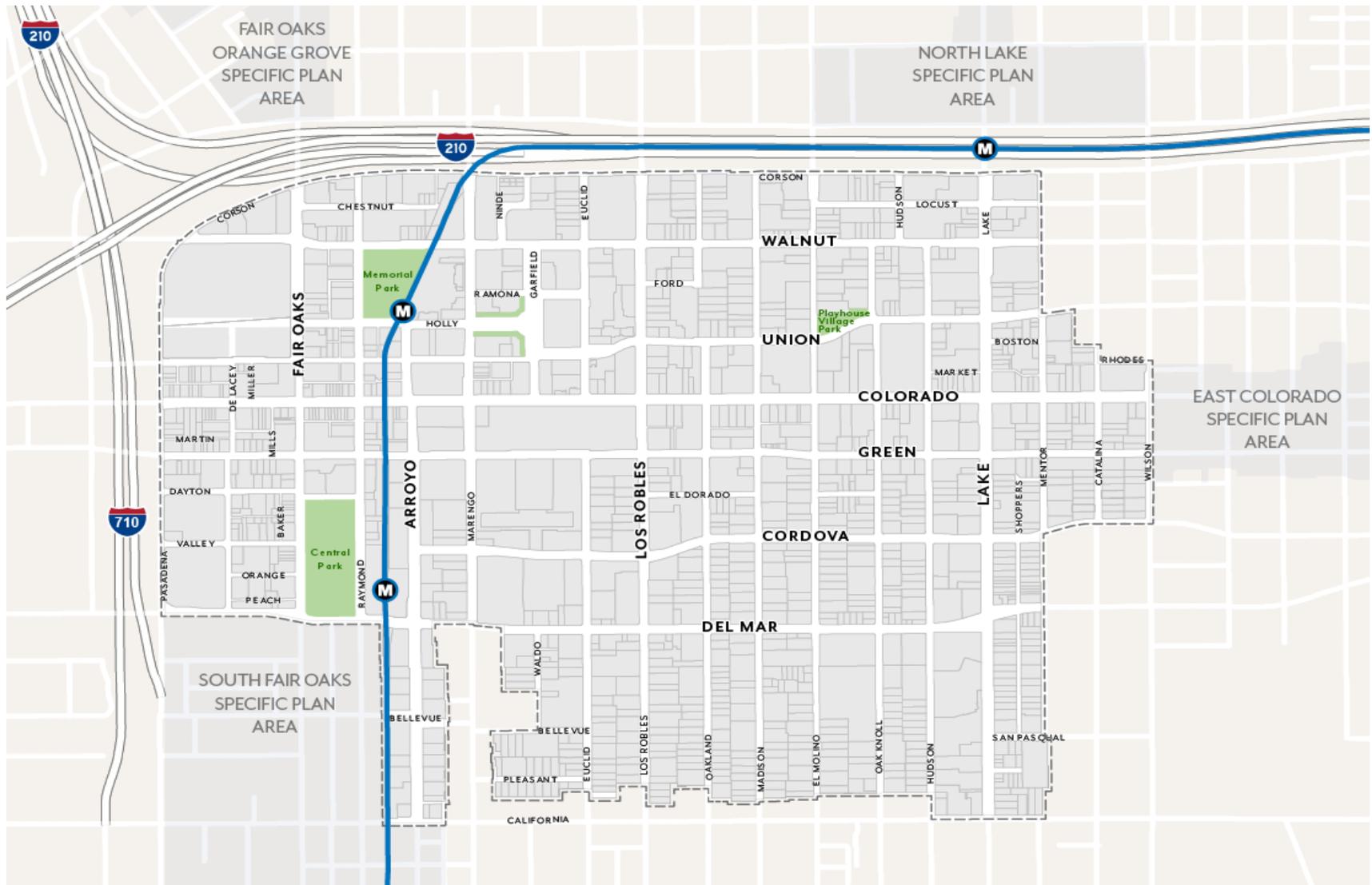


Figure 3 – Revised CDSP Update Area

2.3 Project Objectives

The primary goals and objectives identified in the 2015 GP EIR include:

- **Objective 1:** Provide a new Land Use Element that targets growth to serve community needs and enhance the quality of life. Direct higher density development away from residential neighborhoods and into the Central District, Transit Villages, and Neighborhood Villages.
- **Objective 2:** Reduce vehicle miles traveled for the City and the region by providing a diverse housing stock, job opportunities, and exciting districts with commercial and recreational uses, and transit opportunities in the Central District, Transit Villages, and Neighborhood Villages.
- **Objective 3:** Ensure new development builds upon Pasadena's tradition of strong sense of place, great neighborhoods, gardens, plazas, parks, and trees.
- **Objective 4:** Preserve Pasadena's historic resources by ensuring that new development is compatible with and differentiated from existing historic resources.
- **Objective 5:** Achieve economic vitality and fiscal responsibility by providing jobs, services, revenues, and opportunities with a diverse economic base.
- **Objective 6:** Provide a General Plan that establishes the goals and policies to create a socially, economically, and environmentally sustainable community. Provide safe, well-designed, accessible, and human-scale residential and commercial areas where people of all ages can live, work, and play, including neighborhood parks, urban open spaces, and the equitable distribution of public and private recreational facilities.
- **Objective 7:** Create a cultural, scientific, corporate, entertainment, and educational center for the region. Provide long-term growth opportunities for existing institutions and foster a healthy economy to attract new cultural, scientific, corporate, entertainment, and educational institutions.
- **Objective 8:** Create mobility guidelines and multimodal metrics consistent with Senate Bill (SB) 743. Incorporate new goals, policies, and programs that balance multiple modes of transportation and meet the requirements of the Complete Streets Act.
- **Objective 9:** Reduce greenhouse gas emissions and encourage walking, biking, transit, and other alternatives to motor vehicles by creating strategies to encourage nonautomotive travel and protect residential neighborhoods consistent with Assembly Bill (AB) 32, SB 375, and SB 743.
- **Objective 10:** Reconcile General Plan buildout projections with regional and subregional estimates for growth creating consistency with the Southern California Association of Governments (SCAG).

- **Objective 11:** Incorporate housing sites identified in the adopted Housing Element with the Land Use Element.

In accordance with the GP EIR goals and objectives, the proposed CDSP Update includes the following vision statement:

Vision Statement: The Central District will build upon its existing strengths as Pasadena’s vibrant downtown, providing a diversity of economic, civic, cultural, entertainment, and residential opportunities. The district will be a place to work, shop, live, play, raise a family, and age with dignity, with convenient access by foot, bicycle, assistive device and transit, as well as by car. Physical and economic growth will support this role and respect the numerous resources of historical and cultural significance that contribute to the district’s unique identity.

Vision Objectives:

- *Sustainable Growth:* A district that supports a mix of housing and commercial development near transit and existing services to encourage walkability and transit use.
- *High-Quality Housing:* Well-designed multi-family housing that creates varied and affordable options for the community and supports nearby businesses.
- *Economic Vitality:* Businesses and institutions that contribute to the economic development and vitality of the district and city as a whole, providing the community with services, amenities, and job opportunities while supporting the City’s fiscal health.
- *Identity and Design:* Infill development guided by form-based design standards that respect and enhance historic and cultural resources, encourage adaptive reuse, and strengthen the district’s identity while allowing creative architectural design.
- *Connected Open Spaces:* An extensive networks of public, semi-public, and private open spaces including streets, alleys, paseos, parks, and urban plazas that reinforce a pedestrian-scaled urban fabric and contribute to a unique sense of place in each district.
- *Vibrant Public Realm:* Attractive streetscapes and engaging ground floor design that invites residents, employees, and visitors to walk the district and participate in public life.

2.4 Description of the Proposed Project

The proposed project would update the CDSP to implement the General Plan. As part of the proposed project, a General Plan Land Use Diagram amendment would be adopted so that the Land Use Diagram is consistent with the boundaries and land use categories proposed in the CDSP Update. The purpose of this Addendum to the GP EIR is to evaluate the environmental effects associated with the proposed CDSP Update as compared to the evaluation presented in the GP EIR.

This project proposes to update the following components of the CDSP to bring it into alignment with the General Plan:

- Specific Plan Area boundary
- Vision, objectives, goals and policies
- Zoning districts regulating allowed land uses
- Density and intensity of development
- Height and/or overall scale of buildings and structures
- Distance of buildings and structures to the property line (setbacks/stepbacks)
- Urban design standards
- Vehicle access and parking standards
- Types and amount of open space and landscaping requirements
- Public realm standards (sidewalks, parkways and street trees)
- Implementation programs

Updates to the CDSP primarily focus on refining and/or establishing land uses and zoning districts, as well as objective development standards to achieve the goals and vision of the General Plan. This includes building upon the CDSP area's existing strength as a vibrant downtown with a mix of uses, walkable areas with shopping, entertainment, restaurants, offices, and housing connected by multiple modes of transit. Updates to the CDSP seek to stimulate economic development, encourage pedestrian-oriented retail and services, support pedestrian mobility, and target housing opportunities in a contextually sensitive manner. Through incremental development, the CDSP would strengthen Pasadena's urban core, providing a wider variety of amenities, services, and housing options to residents, employees, and visitors. To support the land use and zoning district updates, the CDSP Update includes urban design standards related to scale, frontages, open space, and parking to encourage quality architecture that enhances the community's unique character. Standards for the public realm are also included in the CDSP Update to address and regulate pedestrian infrastructure and amenities to support a safe, accessible, and comfortable pedestrian experience, including sidewalks, parkways, and street trees. The CDSP Update does not address roadway (curb-to-curb) modifications or improvements, which are within the purview of other City-wide documents.

2.4.1 Relationship to 2015 General Plan

The 2015 General Plan represented an update to the City General Plan Elements, including the Mobility Element and the Land Use Element, which guide the overall physical development of the City. The 2015 General Plan also established new development caps for each of the Specific Plan areas, including the CDSP. However, the General Plan leaves the more detailed development and design standards to be identified in the Specific Plan. The proposed CDSP Update establishes the regulatory tools needed to implement the General Plan through the identification of development and design standards suited to the CDSP area. As this document compares the environmental impacts of the proposed CDSP Update to those analyzed in the GP EIR, it is important to note the following:

- The proposed CDSP Update does not modify or change the intent of the adopted General Plan. Rather, the updates to the CDSP are being proposed to achieve the goals and vision of the General Plan by adding the necessary regulatory tools for implementation. Additionally, a Zoning Code amendment would be required to incorporate a new CDSP ordinance to regulate zoning consistent with the General Plan, replacing the existing Pasadena Municipal Code Chapter 17.30.

- The General Plan established land use and corresponding density and intensity ranges but did not establish development and/or design standards (e.g., height limits, setbacks, etc.). The CDSP Update adds more specific standards to implement the General Plan Land Use categories for the CDSP area. It provides those development and design standards through zoning districts and land use regulations, thereby, further regulating the land uses studied in the GP EIR.
- The proposed CDSP Update sets densities and intensity standards which are within the General Plan ranges with the exception of the following recommended amendments:
 - (1) Change the land use designation for a portion of the parcels at the intersection of North Garfield Avenue and East Holly Street (45 feet behind the street-facing property lines) from Medium Mixed-Use (0-87 du/ac and 0-2.25 FAR) and Institutional to Open Space;
 - (2) Change the land use designation for the parcels that comprise the Playhouse Village Park from Medium Mixed-Use (0-87 du/ac and 0-2.25 FAR) to Open Space;
 - (3) Change the land use designation for parcels on and near North Lake Avenue from High Commercial (0-3.0 FAR) to High Mixed-Use (0-87 du/ac and 0-3.0 FAR);
 - (4) Change the land use designation on two parcels fronting Walnut Street west of North Lake Avenue from Urban Housing (0-87 du/ac) to High Mixed-Use (0-87 du/ac and 0-3.0 FAR);
 - (5) Change the land use designation on five parcels in the vicinity of North Lake Avenue from Medium Mixed-Use (0-87 du/ac and 0-2.25 FAR) to High Mixed-Use (0-87 du/ac and 0-3.0 FAR);
 - (6) Change the land use designation for parcels between Mentor Avenue and Wilson Avenue, north of Cordova Street from High Density Residential (0-48 du/ac) to Medium Mixed-Use (0-87 du/ac and 0-2.25 FAR) and change the Land Use Map to incorporate this area into the CDSP;
 - (7) Change the Land Use Map to remove area south of California Boulevard currently designated Low Mixed-Use (0-32 du/ac and 0-1.0 FAR);
 - (8) Change the land use designation of two parcels fronting South Lake Avenue from Med-High Density Residential (0-32 du/ac) to Low Mixed-Use (0-32 du/ac and 1.0 FAR);
 - (9) Change the land use designation for parcels between El Molino Avenue and Hudson Avenue (south of Del Mar Boulevard, excluding Institutional uses) from Med-High Residential (0-32 du/ac) to High Residential (0-48 du/ac); and

- (10) Change the land use designation for parcels south of Central Court between De Lacey Avenue and Fair Oaks Avenue from Medium Mixed-Use (0-87 du/ac and 0-2.25 FAR) to High Mixed-Use (0-87 du/ac and 0-3.0 FAR).

Figure 4 illustrates proposed General Plan land use designations, which have corresponding density and intensity ranges, within the proposed CDSP Update area.

2.4.2 Relationship to 2003 Central District Specific Plan

The existing Central District Specific Plan was adopted by the City Council in 2004. The 2015 GP and corresponding GP EIR included some policies carried over from the 2004 Central District Specific Plan (2004 SP). The purpose of the 2004 SP was to include a diverse mix of land uses designed to create the primary business, financial, retailing, and government center of the City. The 2004 SP explored the relationship between land use policy, design standards and guidelines, and implementation strategies to accomplish this goal of a vibrant downtown. Building upon the area's existing strengths, it established the direction to create the place that was envisioned by the community.

The development and design standards listed in the 2004 SP are applicable to the parcels in the CDSP area until the CDSP Update being analyzed in this Addendum is adopted. While the CDSP Update builds on many of the objectives from the 2004 SP, the proposed CDSP Update document replaces and supersedes the previous specific plan, introducing updated policies and standards that address current and future community needs, opportunities, and challenges. The CDSP area boundaries have also changed, with the CDSP Update covering a smaller overall area, as discussed below.

The proposed updates to the CDSP would build on the progress initiated by the 2004 SP and further the vision set by the 2015 General Plan by establishing land uses and zoning districts for a more cohesive approach to mixed-use development and public realm connectivity to support transit usage. The specific plan land uses organize land use types by zoning districts while development standards, such as height restrictions, density limitations, parking requirements, public realm, etc. are regulated by location-based maps. The primary changes between the 2004 SP and the CDSP Update include the following:

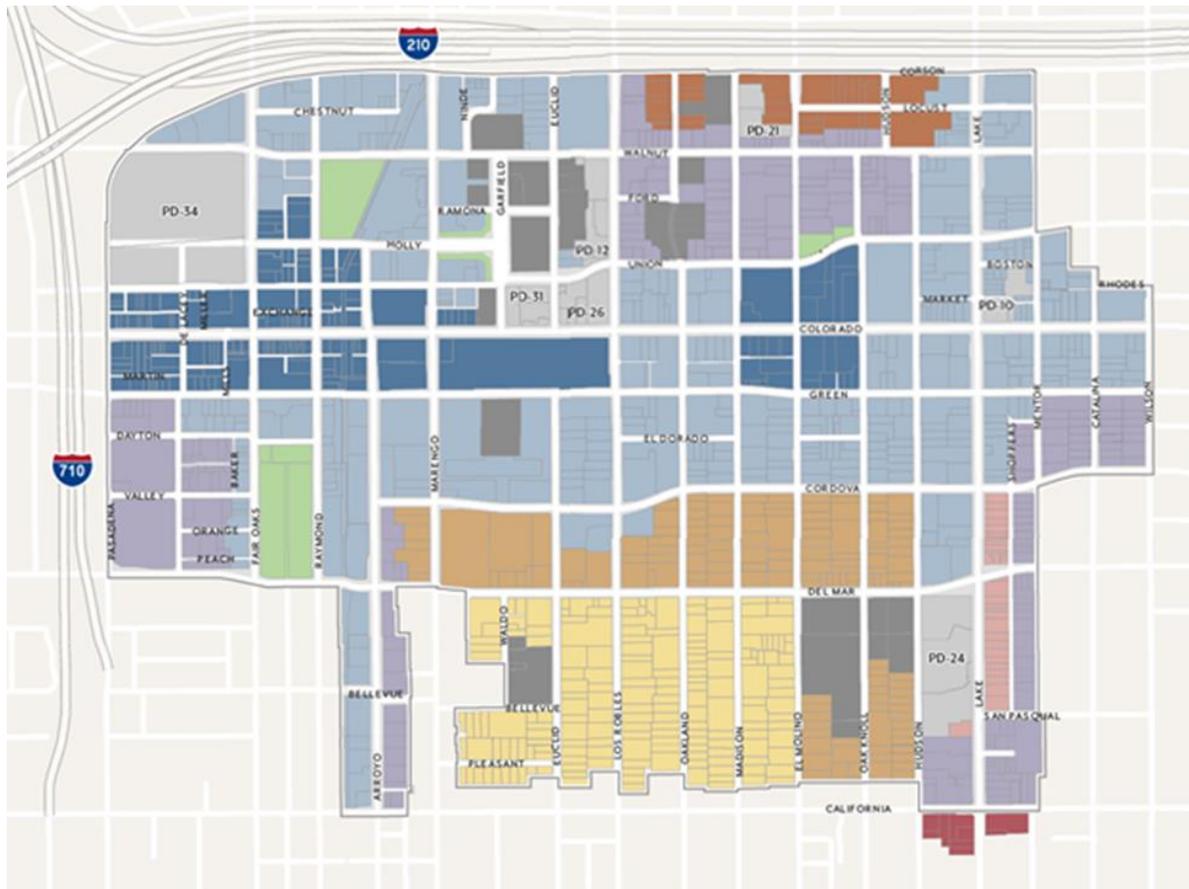
- Updated CDSP boundary to generally align with the 2015 General Plan boundaries, by removing the "Arroyo Entrance Corridor" and "Fair Oaks Employment Village" sub-district precincts. Additionally, parcels south of California Boulevard at Lake Avenue would be removed from the plan area and rezoned to CL-2, and parcels north of Cordova Street between Mentor and Wilson Avenues would be added to the plan area and redesignated as Medium Mixed-Use.
- Updated goals, policies, and standards that align with the 2015 GP and address current and future community needs, opportunities, and challenges.
- Updated subarea boundaries to reflect the vision and existing neighborhoods, including updating the existing seven sub-district precincts to reflect the proposed twelve subareas. This would entail renaming Civic Center/Midtown to Civic Center; dividing Lake Avenue into Mid-Lake and South Lake; renaming In-Town Housing to In-Town Residential; establishing De Lacey and Northwest Gateway (previously part of Old Pasadena); renaming Walnut Housing to Walnut; and establishing Arroyo/Del Mar.
- Allowance of residential and mixed-uses along sections of Lake Avenue which were previously designated for commercial uses only.
- The 2004 CDSP included six zoning districts (CD-1 through CD-6) that would be replaced by seven new zoning districts (CD-MU-C, CD-MU-G, CD-MU-N, CD-CL, CD-RM-87, CD-RM-48, and CD-RM-32), while three existing zoning designations will remain: Open Space, Public and Semi-Public, and Planned Development.

2.4.3 Proposed CDSP Updates

The vision and goals of the proposed CDSP Update are implemented through three sets of tools set forth in the CDSP. These tools include land use regulations, design and development standards, and public realm standards. The unique characteristics of Central District are articulated through defined subareas. Each subarea is implemented by one or more zoning districts that regulate permitted land use types. Development standards are regulated by location, not zoning districts, and include standards that improve building design and require site design that complements existing defining features of a neighborhood's built form, such as consistent setbacks, open space requirements, parking location requirements, and landscaping. General discussions on the development and design standards to be implemented under the CDSP Update are included below.

The zoning district naming conventions reflect their location within a specific plan (CD is used as the zone prefix) as well as the land uses allowed within that zone. The proposed zoning districts would become effective once codified following Council adoption of the proposed CDSP Update. Figure 5 shows proposed zoning districts for the CDSP area and Figure 6 shows proposed generalized land uses under the proposed CDSP Update.

Figure 5 – Proposed Zoning Designations



Zoning Designations

 CD-MU-C	 CD-RM-87	
 CD-MU-G	 CD-RM-48	 PS
 CD-MU-N	 CD-RM-32	 PD
 CD-CL	 OS	 CL-2

* South of California Boulevard between Hudson and Mentor Avenues in CL-2, the maximum FAR shall be 1.0.

Specific Plan Boundary

As discussed in Section 2.2, the proposed CDSP area is generally bounded by Corson Street and the I-210 Freeway to the north, Pasadena Avenue and the I-710 Freeway to the west, and Mentor Avenue to the East. West of the Metro A Line right of way, the CDSP area meets the South Fair Oaks Specific Plan area at Del Mar Boulevard, while east of the Metro right of way, the CDSP area would extend below Del Mar Boulevard. At its far eastern boundary, the CDSP area meets the East Colorado Specific Plan area at Wilson Avenue. This represents a slightly modified boundary than that established by the General Plan, as described above.

Land Use

The proposed updates to the CDSP would tailor zoning districts to current community needs in alignment with the vision of the General Plan. The focus of the CDSP Update allows for financially feasible commercial and residential developments, and helps ensure that new buildings, streetscape improvements, and added amenities contribute positively to the pedestrian experience. This updated approach to land use regulation would support a mixed-use area that creates a range of opportunities for higher-density, transit-oriented development, served by multimodal linkage, and pedestrian open space amenities. The CDSP Update would contain the following zoning districts and corresponding objectives:

Mixed-Use Core (CD-MU-C) – creates a mixed-use activity center that encourages a range of active uses where people can walk to shops, restaurants, jobs, and entertainment. It would also support projects that are entirely commercial or mixed-use, integrated vertically, consistent with ground floor use requirements.

Mixed-Use General (CD-MU-G) – enhances the existing mixed-use character with broadest range of retail, office, services, and multi-family housing. Projects in this zone may be entirely commercial, entirely residential, or a mix of the two, integrated either horizontally or vertically, consistent with ground floor use requirements.

Mixed-Use Neighborhood (CD-MU-N) – promotes the development of pedestrian-friendly neighborhoods with commercial uses that are sensitive to neighboring residents. Projects in this zone may be entirely commercial, entirely residential, or a mix of the two, integrated either horizontally or vertically, consistent with ground floor use requirements.

Commercial Limited (CD-CL) – would allow for a limited selection of pedestrian-oriented commercial uses that complement the surrounding retail-focused district. *Residential Multi-family (CD-RM-87)* – allows opportunities for high density urban housing and relate new development to the surrounding community in scale and character.

Residential Multi-family (CD-RM-48) – maintains the current uses and protect the existing high-density residential character using standards from the City of Gardens Ordinance.

Residential Multi-family (CD-RM-32) – maintains the current uses and protect the existing medium-density residential character using standards from the City of Gardens Ordinance.

Open Space (OS) – provides opportunities for parks and recreation to residents and visitors.

Public and Semi-Public (PS) – maintains the current uses and protect the existing institutional character.

Planned Development (PD) – maintains existing parcels with entitled Planned Developments.

In CD-RM-48 and CD-RM-32 zoning districts, development shall be subject to the allowable land uses and development standards of the respective zoning in PMC 17.22. In OS, PS, and PD zoning districts, development shall be subject to a Conditional Use Permit or Master Plan per PMC 17.26.

Land use in the CDSP Update is regulated consistent with the City's existing list of land use types. However, the CDSP Update introduces a new land use type. The proposed definition for the new land use type is included below and would apply to future development within the specific plan area, as permitted by zoning districts, following adoption of the proposed CDSP Update.

- **Vehicle Services, Automobile Showrooms** is defined as a use where retail storefronts are used as showroom space for five (5) or fewer vehicles and limited to a maximum of 8,000 square feet. Internet vehicles sales are permitted where on-site vehicle storage/sales is not present/allowed.

Mass and Scale, Intensity and Density

The General Plan 2015 Land Use Element designates intensities and density ranges in the CDSP area to support the vision of a series of pedestrian-oriented villages and districts with unique identities, bolstered by their vibrant mix of uses, amenities, and streetscapes. Updates included in the CDSP are intended to:

- Implement the General Plan density ranges, measured as dwelling units per acre (du/ac), and intensity by floor area ratios (FAR);
- Shape development in a manner that creates a defined public realm and appropriate scale of buildings for a visually appealing community;
- Reduce building massing through setback and stepback requirements that create appropriate transitions to residential neighborhoods;
- Support high-quality architecture and urban design through modulation requirements and a varied roof lines incentive;
- Require appropriate transitions to designated historic resources; and
- Support opportunities to increase housing near transit.

The Specific Plan generally implements the allowed density (du/ac) ranges and intensity (FAR) set by the General Plan Land Use Diagram and regulates intensity within the maximum density studied by the General Plan EIR.

Urban Design

Design standards for ground floor frontages proposed by the CDSP Update would help refine building mass and scale and support high-quality architecture and urban design. Frontage standards would prioritize pedestrian access by ensuring doorways are open to a public sidewalk or other public space; increase visibility into ground floor uses to create visual interest for pedestrians; promote shade through arcades and shade structures; support a consistent character when different uses are allowed on the ground floor within the same

black; and limit blank walls on the ground floor to enhance visual interest and pedestrian comfort. The proposed standards are established for each block and are complementary to the previously discussed land use permissions. In mixed-use districts, ground floor requirements are regulated by frontage type, with varying setback depths depending on the percentage of commercial or residential ground floor space to allow for common space and other amenities. A successful ground floor design would create an inviting, visually engaging, shaded sidewalk and pedestrian environment that supports the intended commercial, residential, or mixed-use character of each district. Proposed ground floor standards would reflect community interest to improve the pedestrian experience at the street-level based on the following parameters:

- Ground Floor Height and Modulation standards
- Location of Primary Entrances
- Amount of Street-Facing Transparency
- Minimization of Blank Walls

Open Space

The proposed updates to the CDSP would include open space requirements that would support high quality, accessible and usable open space across a variety of types that contribute to an active public realm and successful building design. Residential open space would be required according to the number of bedrooms, which would result in larger units having a larger open space requirement. Required open space may be private to individual units or common among tenants. Projects with more than 40,000 square feet of non-residential floor area shall provide a minimum of five percent of the gross non-residential floor area as common open space. In addition, projects with more than 80,000 square feet of gross floor area shall provide a percentage of gross floor area as publicly accessible open space. The amount of publicly accessible open space required increases based on the size of a proposed project. Specific locations have been identified to require a plaza or paseo to increase pedestrian activity, as well as provide a pedestrian passageway that connects a public street to another public street, alley, or internal public space, as part of the publicly accessible open space requirement. These changes are intended to expand the amount of open space available to residents and employees along the corridor.

Parking

Vehicle parking requirements proposed by the CDSP Update would lower the parking requirement for some commercial uses to allow more flexibility for business owners as uses change over time; these modified standards are designed to support economic stability and reduce vacancies through simplified regulation. It should be noted that areas within half-mile of high-quality transit, as defined by the State, would not be subject to parking minimums. For the small portion of the plan area outside this radius, the Specific Plan standardizes most commercial uses at two spaces per 1,000 square feet to allow flexibility for changes of use in existing structures, aiding new business openings and promoting the reuse of existing buildings. Projects are exempted from being required to provide parking for the first 5,000 square feet of a new or existing commercial use and first 500 square feet of private property outdoor dining (per tenant); this is intended to lower the cost of opening a small business and incentivize commercial uses being included within mixed-use buildings, as well as and outdoor dining itself. No new parking would be required for projects within designated historic resources (excluding additions) and changes of use in structures built prior to 1970. Residential parking requirements would also be slightly reduced from existing requirements

for some unit sizes; new residential units would be required to sell or rent parking spaces separately (i.e., 'unbundled parking') from the unit itself to reduce the cost of housing in the area and encourage use of alternative forms of transportation.

Public Realm & Setbacks

Public realm requirements proposed by the CDSP Update would improve sidewalk conditions and the pedestrian experience by ensuring that a minimum sidewalk width is achieved by reinforcing existing widths or requiring slight increases in key locations as new development occurs. The CDSP Update builds on Pasadena's Street Design Guide to ensure sufficient widths to create a sidewalk environment that supports functional activities.

The sidewalk width requirements would correlate with the level of activity and surrounding densities, intensities, and uses identified in the CDSP. Minimum sidewalk widths are either required, consistent with existing urban form, or expanded. Setback ranges combined with minimum sidewalk widths would result in a wider public realm in most locations as new development occurs, or in some cases setback reductions reinforce historic character. New width requirements for sidewalk zones would support adequate space for street trees, parkways, pedestrian movement, and other amenities. The CDSP Update would require parkways to be provided by new development, including that a minimum of 80 percent of the total required parkway is landscaped with planted material, with additional requirements to increase stormwater retention. Street trees would be required to be planted in larger-than-currently-required tree wells and follow planting requirements to better support tree health. Shade features are required of new development to support a more comfortable pedestrian experience.

As mentioned in the Open Space sub-section, some developments in the CDSP area are required to provide paseos to meet requirements for publicly accessible open space. Proposed paseo requirements and guidelines are intended to increase pedestrian connectivity and visual interest by reducing large block sizes and providing additional publicly accessible open space while improving walkability and creating safe spaces for pedestrian travel.

CHAPTER 3 EVALUATION OF ENVIRONMENTAL IMPACTS

The following evaluation assesses the environmental impacts of the proposed CDSP Update in relation to the analysis provided in the 2015 GP EIR. Determinations are made as to whether the proposed project would result in new significant impacts or substantially more severe effects, which would trigger the need for a Subsequent or Supplemental EIR.

For each threshold identified below, the following questions are addressed and discussed in the narrative for each issue:

What is the CDSP Update's impact conclusion?

For each impact identified below, a level of significance of the impact is provided. While criteria for determining significant impacts are unique to each issue area, the environmental analysis applies a uniform classification of the impacts based on the following definitions consistent with CEQA and its implementing CEQA Guidelines:

- **No Impact (NI)** – A designation of no impact is given when no changes in the environment would occur.
- **Less than Significant Impact (LTS)** – A less than significant impact would cause no substantial adverse change in the environment.
- **Less than Significant Impact with Mitigation (LTS-M)** – A less than significant impact with mitigation incorporated avoids substantial adverse impacts on the environment with adherence to identified mitigation measures. For those issue areas where the impact of the CDSP Update would be less than significant with the incorporation of the same mitigation measure(s) identified in the GP EIR, the impact is identified as **LTS-M(GP)**. The number of the mitigation measure from the MMRP will be referenced and summarized in Chapter 4.
- **Significant and Unavoidable Impact (S-U)** – A significant unavoidable impact would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less than significant level.

What is the GP EIR impact conclusion? The issues that were found to be either less than significant or were found to have no impact in the Initial Study prepared for the GP Update and were therefore excluded from further analysis in the GP EIR, are identified with (IS) after the impact conclusion.

Does the CDSP Update involve new significant impacts or substantially more severe impacts than those analyzed in the GP EIR?

Are there any new or changed circumstances involving new significant impacts or substantially more severe impacts than those analyzed in the GP EIR?

Is there any new information of substantial importance that was not and could not have been known at the time of certification of the GP EIR that rises to the level of requiring new analysis or verification?

Are any new mitigation measures required for the CDSP Update?

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
I. AESTHETICS. <i>Would the project:</i>						
a) Have a substantial adverse effect on a scenic vista?	LTS	LTS	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LTS	LTS (IS)	No	No	No	No
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	LTS	LTS	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	LTS	No	No	No	No
Discussion: The GP EIR concluded that implementation of the approved General Plan Update, specifically including buildout of the CDSP area, would result in less than significant environmental impacts to aesthetics. While buildout of the General Plan would visibly alter the CDSP area						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>by allowing new housing-oriented mixed-use buildings (or other high-density projects) with taller heights in a neighborhood previously dominated by commercial uses, the GP EIR found that development in accordance with the General Plan Land Use Element would not significantly impact views of the San Gabriel Mountains. The GP EIR concluded that the proposed FAR for parcels in the CDSP area would limit the size and bulk of new development, and implementation of proposed GP Update policies would ensure that all new development contributes to the neighborhood’s sense of place and contribute to the CDSP area’s continued transformation into a walkable mixed-use community.</p> <p>Additionally, as discussed in the GP EIR, there are no designated state scenic highways located within the CDSP area. Although permitted development under the approved General Plan Update could result in increased light and glare, the CDSP area is primarily developed, and any new development would be required to adhere to the Municipal Code and other regulations related to light and glare. Thus, the GP EIR found this issue to be less than significant. Overall, the GP EIR concluded that proposed land use changes in the General Plan Update, and specifically as they pertain to the CDSP area, would not adversely impact visual and scenic quality, but would instead improve the aesthetic quality of the neighborhood.</p> <p>As detailed in Section 2.4, proposed updates to the CDSP primarily focus on refining and/or establishing land uses and zoning districts, as well as objective development standards to achieve the goals and vision of the General Plan. Updates included in the proposed CDSP are intended to implement the densities and FARs analyzed in the GP EIR, foster a mixed-use community that supports integrated residential and non-residential uses at an appropriate scale. The CDSP Update proposes ten zoning districts that allow for the creation of transit-oriented, mixed-use activity centers surrounding the Metro A Line that supports local housing options and encourages commercial uses that provide local jobs, goods, and services. Updates included in the proposed CDSP are intended to implement the densities and intensities analyzed in the GP EIR, shape development in a manner that creates a defined public realm and appropriate scale of buildings for a visually appealing community, reduce building massing through setback and stepback requirements that create appropriate transitions to residential neighborhoods, support high-quality architecture and urban design through modulation requirements</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>and a varied roof lines incentive, and require appropriate transitions to designated historic resources. To accomplish this, the CDSP Update generally implements the allowed density ranges and intensity set by the General Plan Land Use Diagram and regulates density within the maximum density studied by the General Plan EIR. As the proposed CDSP Update would align with and implement the General Plan, buildout of the CDSP Update would not significantly impact visual character or quality. Additionally, as indicated in the GP EIR, there are no designated state scenic highways located within the CDSP area. Therefore, the updates to the CDSP would result in no impact to state scenic highways.</p> <p>Furthermore, the current CEQA Guidelines Appendix G checklist also recommends considering a project’s potential to conflict with applicable zoning and other regulations governing scenic quality if the project is located in an urbanized area. As discussed, the proposed CDSP updates include additional land use regulations and establish development/design standards. Similar to the General Plan Update, these CDSP updates would not significantly impact views of the San Gabriel Mountains and would improve the aesthetic quality of new development as well as help refine the existing character within the CDSP area through enhancements to the public realm. Therefore, impacts related to scenic quality would be less than significant with implementation of the CDSP Update.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
II. AGRICULTURAL RESOURCES. <i>Would the project:</i>						
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?	NI	NI (IS)	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	NI	NI (IS)	No	No	No	No
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 for Timberland Production (as defined by Government Code Section 51104[g])?	NI	NI (IS)	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
d) Result in the loss of forest land or conversion of forest land to non-forest use?	NI	NI (IS)	No	No	No	No
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	NI	NI (IS)	No	No	No	No
<p>Discussion:</p> <p>Agriculture and forestry resources were addressed in the Initial Study (IS) prepared for the GP EIR, which found that no impacts to this topic would occur following the implementation of the General Plan Update. The Zoning Code permits commercial growing in designated zoning districts; however, the IS stated that the General Plan Update did not alter uses permitted by the Zoning Code, and the objectives of the General Plan Update did not relate to or conflict with commercial growing.¹ The IS also stated that there are no Williamson Act contracts in the City, nor is any part of the City designated as timberland, forest land, or farmland; as such these types of lands would not be converted to another use.² The General Plan Update did not have any impacts on agriculture and forestry resources.</p> <p>Similar to the General Plan Update, the proposed CDSP Update would not alter zoning districts or permitted land uses in a way that conflicts with the Zoning Code regarding the conversion of farmland, timberland, or forest land. While the proposed CDSP Update includes additional land use regulations and establishes development/design standards, the objectives of the CDSP Update do not</p>						

¹ City of Pasadena, Initial Study/Notice of Preparation, 2013.

² City of Pasadena, Initial Study/Notice of Preparation, 2013.

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>include land use provisions or regulations around commercial growing. While modifications from the General Plan Update would alter the CDSP area boundaries within the City of Pasadena by removing the properties south of California Boulevard and adding those north of Cordova Street, between S. Mentor Avenue and S. Wilson Avenue, these modifications would not include any land designated as timberland, forest land, or farmland.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
III. AIR QUALITY. <i>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</i>						
a) Conflict with or obstruct implementation of the applicable air quality plan?	S-U	S-U	No	No	No	No
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	S-U	S-U	No	No	No	No
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	S-U	S-U	No	No	No	No
d) Expose sensitive receptors to substantial pollutant concentrations?	LTS-M(GP)	LTS-M	No	No	No	No
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS-M(GP)	LTS-M	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
<p>Discussion:</p> <p>The GP EIR found that potentially significant impacts to air quality would occur if mitigation measures were not incorporated; in some instances, the GP EIR found impacts to air quality to be significant and unavoidable because no feasible mitigation measures would be available to reduce impacts to a less than significant level. The City of Pasadena is entirely within the South Coast Air Basin (SCAB) and therefore must comply with the rules and regulations imposed by the South Coast Air Quality Management District (SCAQMD). The SCAB is also subject to the California Ambient Air Quality Standards (CAAQS) adopted by the California Air Resources Board (CARB) and the National Ambient Air Quality Standards (NAAQS) adopted by the federal government. The SCAB is designated a nonattainment area (i.e., an area that does not meet the ambient air quality standards) for ozone (O3), fine inhalable particulate matter (PM2.5), and coarse inhalable particulate matter (PM10) under the CAAQS, and a nonattainment area for O3, PM2.5, and lead (Los Angeles County only) under the NAAQS.³ The GP EIR concluded that buildout of the General Plan Update would increase employment and population beyond current SCAG forecasts and contribute to cumulative SCAB nonattainment designations. While certain aspects of the General Plan Update Land Use Plan would lead to improvements in transportation and thus decrease emissions from that source, the GP EIR found that even with implementation of Mitigation Measure 2-1, requiring the preparation of a technical assessment evaluating potential project construction-related air quality impacts to the City Planning Division prior to issuance of construction permits, and Mitigation Measure 2-2, requiring the preparation of a technical assessment evaluating potential project operation-related air quality impacts to the City Planning Division prior to project approval, construction and operation impacts would not be reduced below the required SCAQMD thresholds, and that future impacts could be significant and unavoidable. The GP EIR stated that although submission of a technical assessment for possible construction related impacts required by Mitigation Measure 2-1 could reduce criteria air pollutant impacts for individual projects, the cumulative impact of all future construction emissions would result in significant and unavoidable impacts. In relation to the operation of buildout, the GP EIR stated that future activity would exceed SCAQMD thresholds</p>						

³ California Air Resources Board (CARB). 2014a, April 17. Area Designations Maps/State and National. <http://www.arb.ca.gov/desig/adm/adm.htm>

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>as well, and that while Mitigation Measure 2-2 requiring the submission of an emissions assessment for operation-related impacts for individual future development projects, could reduce individual project impacts, the cumulative impacts of the General Plan Update buildout would be significant and unavoidable. The GP EIR found that implementation of the General Plan Update could expose existing or planned sensitive receptors to criteria air pollutants and toxic air contaminants (TACs), but that Mitigation Measure 2-3, requiring the submittal of a Health Risk Assessment (HRA) for certain new industrial or warehousing land uses requiring use of diesel trucks within 1,000 feet of a sensitive land use prior to project approval, would ensure that mobile sources of TACs not covered under SCAQMD permits would be considered during subsequent project-level environmental review. The HRA prepared for those projects identified under Mitigation Measure 2-3 would identify project-specific measures to minimize health risk and individual projects would be required to achieve the incremental risk thresholds established by SCAQMD, thus reducing impacts to less than significant. This, however, would only reduce the impact on a project-by-project basis, and the GP EIR concluded that the future buildout of the General Plan Update would result in cumulative impacts to sensitive receptors that are significant and unavoidable. The GP EIR found that Mitigation Measures 2-4 and 2-5 would require that major sources of air pollutants achieve incremental risk thresholds when placed near a sensitive receptor, as well as practice measures to minimize odors, reducing both impacts to a less than significant level.</p> <p>The proposed CDSP falls within the City of Pasadena and thus within the bounds of the area analyzed by the GP EIR; however, the CDSP area only accounts for a small portion of the area analyzed under the GP EIR. The CDSP Update includes parcels generally bounded by Corson Street and the I-210 Freeway to the north, Pasadena Avenue and the I-710 Freeway to the west, and Mentor Avenue to the East. West of the Metro A Line right of way, the CDSP area meets the South Fair Oaks Specific Plan area at Del Mar Boulevard, while east of the Metro right of way, the CDSP area extends south around California Boulevard. At its far eastern boundary, the CDSP area meets the East Colorado Specific Plan area at Wilson Avenue. The CDSP area is primarily built out, and the proposed CDSP Update would govern land uses and improvements to integrate the parcels in a more cohesive, walkable pattern relative to the Metro A Line. Buildout of the proposed CDSP Update would address the following goals and policies related to Air Quality that the General Plan Update proposed for the City’s Land Use Element for the Central District: Goal 5, Policy LU 5.2: <i>Require buildings in the</i></p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p><i>Central District, Transit Villages, Neighborhood Villages, and along corridors specified by the adopted specific plans to be located along the street/sidewalk and designed to promote pedestrian activity. This can be accomplished by incorporating transparent facades, small plazas, and dining areas; while locating parking to the rear or underground and placing primary entries on the street; Goal 19, Policy LU 19.2: Establish limits to the amount of parking that may be developed for projects in the Central District and Transit Villages to promote walking, bicycling, and use of transit as an alternative to the automobile; Goal 19, Policy LU 19.4: Provide the opportunity for residents, patrons, and visitors to park once and visit many destinations in the Central District, Transit Villages, and Neighborhood Villages through centrally located shared parking while providing additional flexibility for businesses to provide parking off-site or participate in other alternative parking funding mechanisms; Goal 19, Policy 19.5: Accommodate the development of bicycle parking centers in the Central District, Transit Villages, and Neighborhood Villages and require larger development projects to incorporate secured and convenient bicycle parking facilities; Goal 31, Policy 31.5: Increase the network of transit, walking, and bicycling opportunities between sub-areas within the Central District through expanded services, additional rights of way/pathways with corresponding signage; and Goal 33, Policy 33.5: Require future developers to modify large commercially-developed parcels with a network of internal pedestrian ways and sidewalks along which buildings will be clustered, establishing a smaller, walkable block grid comparable to the Central District. Such goals and policies would contribute to reductions in vehicle trips, energy consumption, and GHG emissions. It is likely that, similar to the impacts addressed in the GP EIR, impacts to air quality from the buildout of the proposed CDSP Update would be less than significant for each individual project (and will be analyzed on a project-by-project basis), but that the magnitude of future buildout, even though less than assumed under the GP EIR, could result in cumulative impacts that are significant and unavoidable. GP EIR Mitigation Measures 2-1 through 2-5 would be applicable to the proposed CDSP Update. Implementation of these mitigation measures would not result in increased impacts from those identified in the GP EIR and given that the CDSP area is proposed to be smaller in geographic area and with a smaller built out capacity than the area analyzed under the GP EIR, the CDSP would be anticipated to result in less impacts compared to those identified in the GP EIR.</i></p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
<p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
<p>IV. BIOLOGICAL RESOURCES <i>Would the project:</i></p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LTS	LTS-M	No	No	No	No
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?	LTS	LTS-M	No	No	No	No
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?	LTS	LTS-M	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
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?	LTS	LTS (IS)	No	No	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	NI	NI (IS)	No	No	No	No
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?	NI	NI (IS)	No	No	No	No

Discussion:

The GP EIR identified four areas within the boundaries of the General Plan Update area where sensitive natural habitats occur to varying degrees, including Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, and the San Rafael Hills; however, the land use changes included within the General Plan Update would be confined to the eight specific plan areas within the City, none of which contain sensitive natural habitats and all of which are urbanized or suburban in character. Yet, because Arroyo Seco, Eaton Canyon Corridor, Hastings Canyon, and the San Rafael Hills all contain sensitive natural habitats, the GP EIR concluded that buildout of the

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>General Plan Update could cause potentially significant impacts to biological resources. The GP EIR found that Arroyo Seco, Eaton Canyon, and Hastings Canyon all contain jurisdictional waters, and that the San Rafael Hills contain riparian and/or wetland habitat. No land use changes were proposed in these areas, however, the GP EIR states that buildout of the General Plan Update could have potentially significant impacts to sensitive species, sensitive natural communities, and jurisdictional waters and/or wetlands. Mitigation Measures 3-1 through 3-6 would ensure that a qualified biologist would be involved in the assessment, mitigation, and monitoring of all projects occurring on land where impacts to biological resources could be potentially significant; impacts would then be reduced to a less than significant level following implementation of the mitigation measures. The IS prepared for the GP EIR found that development projects approved under the GP Update, including within the City’s eight specific plan areas, would be required to comply with the City’s Master Street Tree Plan, Chapter 17.44 (Landscaping) of the City’s Zoning Code, and the Migratory Bird Treaty Act (MBTA), as applicable. As such, the General Plan Update’s impact on overland wildlife movement and migration would be less than significant and the General Plan Update would not conflict with the City’s tree protection ordinance. Additionally, the IS prepared for the GP EIR indicated that there are no adopted habitat conservation or natural community conservation plans within the City and, as such, concluded that no impacts to such plans would result from the General Plan Update.</p> <p>As stated in the GP EIR, all proposed land use changes would be confined to the eight specific plan areas in the City, including the proposed CDSP area. The proposed CDSP area is designated as urban and suburban developed land containing some developed open space.⁴ The GP EIR concluded that the specific plan areas, inclusive of the proposed CDSP area, did not contain any sensitive natural habitats, jurisdictional waters, or wetlands. As such, there are no Mitigation Measures applicable to the proposed CDSP Update. Similar to the General Plan Update, development under the CDSP Update would be required to comply with the City’s Master Street Tree Plan, Chapter 17.44 (Landscaping) of the City’s Zoning Code, and the MBTA, as applicable. Therefore, development under the CDSP Update would not conflict with the City’s tree protection ordinance and impacts to wildlife movement and migration would be</p>						

⁴ City of Pasadena. 2015 General Plan EIR: Figure 5.3-1, *Vegetation Zones*.

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>less than significant. Additionally, as indicated in the IS prepared for the GP, there are no adopted habitat conservation or natural community conservation plans within the City. Therefore, the proposed CDSP Update would not result in impacts to any such plans.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
V. CULTURAL RESOURCES <i>Would the project:</i>						
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	LTS	LTS-M	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	LTS-M(GP)	LTS-M	No	No	No	No
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS	LTS-M	No	No	No	No
d) Disturb any human remains, including those interred outside of formal cemeteries?	LTS	LTS	No	No	No	No
Discussion: The GP EIR found that, while the General Plan Update did not propose the alteration or demolition of any historic landmarks, any development under buildout of the General Plan Update could potentially impact a historic resource, as the GP EIR lists 7,440 historical resources throughout the City which meet at least one state or national criteria. The GP EIR states that the likelihood of encountering						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>and impacting a historical resource is greater within a historic district, and that any specific plan area that contains, is within, or adjacent to a historic district has a greater likelihood for impacting historical resources. The GP EIR states that future projects under the buildout of the General Plan Update can avoid significantly impacting historical resources by adhering to the Pasadena Municipal Code 17.61.030 design review, to state and federal regulations, and to the policies of the City’s Land Use Element, including Policy LU 8.5, Scale and Character of New Construction in Designated Landmark and Historic Districts. Additionally, Mitigation Measure 9-4, which is discussed in Section XIII, would ensure that vibrations from construction activity would not impact architectural structures of historical significance. Impacts to archaeological resources can be reduced to a less than significant level upon implementation of Mitigation Measure 4-1, which would halt construction upon discovery of an archaeological resource and require consultation with a registered archaeologist before proceeding with development. The GP EIR lists the Topanga Formation as an area sensitive to paleontological resources and states that implementation of Mitigation Measure 4-2, which would enlist the service of a registered paleontologist prior to any grading activity in the vicinity of this area, as a sufficient measure to reduce the impact to a less than significant level. The GP EIR concluded that grading activities within the General Plan Update area are not expected to disturb human remains.</p> <p>The CDSP area includes historically designated resources, City identified Landmark Buildings, and properties of significant historic character. the proposed CDSP Update would include development standards for Historic Adjacency. Projects on parcels with a designated historic resource in the CDSP Update would be subject to review for consistency with the Secretary of the Interior’s Standards. Projects sharing a property line with a designated historic resource in the CDSP Update would be subject to proposed modified standards for street setbacks, interior setbacks, streetwall heights, and interior setbacks. Additionally, similar to the General Plan Update, proposed development in the CDSP area would be required to adhere to the Pasadena Municipal Code 17.61.030 design review, to state and federal regulations, and to the policies of the City’s Land Use Element, including Policy LU 8.5, Scale and Character of New Construction in Designated Landmark and Historic Districts. Therefore, buildout of the CDSP Update is not expected to significantly impact historical resources. If archaeological resources are discovered during construction of any project under the buildout of the proposed CDSP Update, GP EIR Mitigation Measure 4-1 would be implemented, and the impact level would be less than significant. As the CDSP area is not listed as a sensitive paleontological area, projects under buildout of the proposed CDSP</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>Update would not significantly impact these resources.⁵ As the CDSP area is within the area analyzed by the GP EIR and found not likely to contain unknown human remains, the proposed CDSP Update would not significantly impact human remains with the required compliance with the Health and Safety Code.</p> <p>The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts to tribal cultural resources. Tribal cultural resources are 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. These types of resources were analyzed in the GP EIR and Native American consultation was conducted. No sacred lands were identified in the CDSP area during consultation. The GP EIR concluded that the results of the Native American consultation did not result in new information or unknown impacts, but that while there are no known sacred lands within the City, the potential to uncover archaeological resources during grading remains. Buildout of the CDSP Update would incorporate GP EIR Mitigation Measure 4-1 if any archaeological resources, including tribal cultural resources, are discovered during construction, reducing the impact level to less than significant.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

⁵ City of Pasadena. 2015 General Plan EIR. Figure 5.4-2: *Paleontological Sensitivity*.

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
VI. ENERGY <i>Would the project:</i>						
a) Conflict with adopted energy conservation plans?	LTS	LTS (IS)	No	No	No	No
b) Use non-renewable resources in a wasteful and inefficient manner?	LTS	LTS (IS)	No	No	No	No
Discussion: Energy was not addressed in the GP EIR, as the IS prepared for the GP EIR found that impacts to this topic from buildout of the General Plan would be less than significant. The IS stated that Pasadena’s Department of Water and Power (PWP) had the capacity to service the projected buildout of the General Plan Update. ⁶ Additionally, the IS stated that the City of Pasadena is wholly within the bounds of a Southern California Gas Company service area. Forecasted use from the buildout of the General Plan Update – which would be an increase in energy use - was found to be within the capacity of existing facilities. ⁷ All new development and tenant improvements would be required to comply with the California Energy Code, Part 6 of the California Building Standards Code (Title 24), CALGreen standards, the City’s Green Action Plan, the City’s Green Building Standards Code (14.04.504), and the Open Space and Conservation Element of the General Plan, which together would increase efficiency and decrease consumption levels compared to existing structures built under the 2008 Building and Energy Efficiency Standards or targets established prior to those standards. ⁸ As such, the intensification of energy use resulting from buildout of the General Plan Update would result in a less than significant impact.						

⁶ City of Pasadena, Initial Study/Notice of Preparation, 2013.
⁷ City of Pasadena, Initial Study/Notice of Preparation, 2013.
⁸ City of Pasadena, Initial Study/Notice of Preparation, 2013.

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>The proposed CDSP Update is located within the boundaries of the area that was captured under the IS and GP EIR. New developments in the CDSP area would be required to comply with the California Energy Code, Part 6 of the California Building Standards Code (Title 24), CALGreen standards, the City’s Climate Action Plan, and the City’s Green Building Standards Code, which collectively would increase efficiency and decrease consumption levels. Any new developments in the CDSP area would require lateral connections to mainlines in coordination with existing utility service providers. While the land use types under the proposed CDSP Update would encourage multifamily residential and mixed-use zoning, and thereby potentially increase demand in energy over existing conditions, the proposed CDSP area is largely developed and urbanized under existing conditions, and this increase in development is not expected to exceed forecasted use captured under the IS and GP EIR. No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
VII. GEOLOGY AND SOILS <i>Would the project:</i>						
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:						
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to California Geological Survey Special Publication 42.	LTS	LTS (IS)	No	No	No	No
ii. Strong seismic ground shaking?	LTS	LTS (IS)	No	No	No	No
iii. Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other	LTS	LTS (IS)	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
substantial evidence of known areas of liquefaction?						
iv. Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?	LTS	LTS (IS)	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	LTS	LTS (IS)	No	No	No	No
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LTS	LTS (IS)	No	No	No	No
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	LTS	LTS (IS)	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Raises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
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?	NI	NI (IS)	No	No	No	No
<p>Discussion:</p> <p>Geology and soils were addressed in the IS prepared for the GP EIR, which found that impacts to this topic would be less than significant following the implementation of the General Plan Update. According to the Safety Element of the General Plan one Alquist-Priolo earthquake fault zone along the Raymond Fault, an active strand of the Sierra Madre Fault, and a possibly active strand of the Sierra Madre Fault pass through the City, and the San Fernando and Whittier Faults are located within 10.5 and 15.5 miles from the City, respectively. All active faults could experience a surface rupture in the lifetimes of development resulting from buildout of the General Plan Update. The Safety Element, California Building Code, the City’s Building and Safety Division, and the City Building Code would require all new development to comply with policies and regulations surrounding surface ruptures and would be required to conduct and submit engineering geology and soils reports prior to permit approval. Policies within the above stated regulatory setting would also enforce specific building standards related to seismic ground shaking, as the soil in the City is either sandy, stony, or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains, which are soil types characterized as loose and porous and thus susceptible to seismic ground shaking. Geotechnical investigations be required for all new development approval as the City contains zones where liquefaction could occur near Arroyo Seco, in the San Rafael Hills, and near Eaton Canyon and Hastings Canyon. State and City building codes contain standards that new development must comply with pertaining to liquefaction as well. Geotechnical investigations would also be required to investigate and recommend measures to reduce the potential for landslides and building designs would be required to comply with slope standards, as the City is susceptible to earthquake-induced landslides originating in the San Gabriel Mountains and San Rafael Hills. The IS concluded that natural water soil erosion potential in the City is low, that future</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>construction has the possibility to expose soil to erosion, and that all construction activity would be required to practice soil erosion mitigation practices and adhere to a transport and grading control plan as required by the Los Angeles County Stormwater Program. The above-mentioned potential for landslides and liquefaction in addition to the susceptibility to lateral spreading and/or collapse due to the project location and quality of the soil would need to be included in each geotechnical investigation. Groundwater extraction would be monitored by the Raymond Basin Management Board to ensure the continued prevention of regional subsidence.⁹ Finally, each geotechnical investigation would be required to address soil expansion and each project would be required to comply with the associated standards of the Building and Safety Division and California Building Code. As the project area is urbanized, septic tanks would not be utilized during buildout of the General Plan Update. Development would include sewer lateral lines and would not rely on septic tanks or alternative wastewater disposal systems. With adherence to all regulations and policies, submission of a geotechnical report, and implementation of appropriate practices during construction, the IS concluded that buildout of the General Plan Update would have a less than significant impact to geology and soils.</p> <p>The proposed CDSP falls within the same City boundaries as were analyzed in the IS, and therefore is subject to similar risks and associated potential impacts related to geology and soils. Therefore, the CDSP Update would not cause significant impacts beyond those analyzed in the IS for the GP EIR. Additionally, buildout of the proposed CDSP Update would be required to adhere to the same regulations, policies, and standards pertaining to geology and soils impacts, both during construction and operation, including the preparation of project-specific geotechnical investigations for individual development projects.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

⁹ City of Pasadena, Initial Study/Notice of Preparation, 2013.

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VIII. GREENHOUSE GAS EMISSIONS <i>Would the project:</i>						
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	S-U	S-U	No	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	LTS	LTS	No	No	No	No
Discussion: The GP EIR concluded that while certain improvements under the buildout of the General Plan Update would reduce Greenhouse Gas (GHG) emissions per service population, the buildout would still create more GHG emissions than existing conditions and would not achieve long-term GHG reduction goals under Executive Order S-03-05 and target levels of AB 32; after implementing Mitigation Measure 5-1, which required the City to prepare a community climate action plan/greenhouse gas reduction plan, the impacts related to GHG emissions would remain significant and unavoidable. Forecasting tools to measure future emissions from transportation, energy, waste, water/wastewater, and other sources (landscaping equipment, light commercial equipment, and construction equipment) provided a short-term projection for future levels; however, these projections were found to be insufficient given the uncertainty of how the General Plan Update buildout would be phased. The GP EIR found that without implementation of a community climate action/GHG reduction plan and under current state and federal regulations, the population growth that would result from buildout of the General Plan Update would prevent the City from meeting AB 32 targets for emissions. While buildout would improve						

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<p>transportation by creating a live/work environment, offering options for alternative and multi-modal mobility, and utilizing energy efficient design and technology, the GP EIR stated that the population growth would still create more emissions than existing conditions. The community climate action plan/greenhouse gas reduction plan would establish community-wide targets, monitoring, and inventory reporting standards. The GP EIR established that the community-wide GHG emissions inventory would be updated every five years, and additional programs would be established to work in conjunction with the initial community climate action plan/greenhouse gas reduction plan (programs specific for building energy, transportation, waste, water, wastewater, agriculture, etc.). The GP EIR concluded that it is uncertain whether buildout would create significant and unavoidable GHG related impacts without knowing the phasing of buildout or what future federal, state, and local programs will exist at the time. The GP EIR found that the General Plan Update would not conflict with the CARB Scoping Plan or the Southern California Association of Governments’ (SCAG) 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).</p> <p>The proposed CDSP Update would further refine the land uses from those analyzed in the GP EIR and establish additional development/design standards. The proposed CDSP Update would allow for increased intensity within the CDSP area compared to existing conditions; however, proposed overall intensity would be equal to or lower than limits analyzed under the GP EIR. Additionally, buildout of the CDSP Update would be within the General Plan buildout analyzed in the GP EIR. The CDSP improvements included in the proposed CDSP Update would create a district that supports a mix of housing and commercial development near transit and existing services to encourage walkability and transit usage, all supported by a public realm that invites residents, employees, and visitors to walk the district, with active streetscapes, open spaces, and rich landscaping that encourages public life and a sense of place. Buildout of the proposed CDSP Update would address the following goals and policies proposed by the General Plan Update for the City’s Land Use Element for Central District: Goal 5, Policy LU 5.2: <i>Require buildings in the Central District, Transit Villages, Neighborhood Villages, and along corridors specified by the adopted specific plans to be located along the street/sidewalk and designed to promote pedestrian activity. This can be accomplished by incorporating transparent facades, small plazas, and dining areas; while locating parking to the rear or underground and placing primary entries on the street;</i> Goal 19, Policy LU 19.2: <i>Establish limits to the amount of parking that may be developed for projects in the Central District and Transit Villages to promote walking,</i></p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
<p><i>bicycling, and use of transit as an alternative to the automobile; Goal 19, Policy LU 19.4: Provide the opportunity for residents, patrons, and visitors to park once and visit many destinations in the Central District, Transit Villages, and Neighborhood Villages through centrally located shared parking while providing additional flexibility for businesses to provide parking off-site or participate in other alternative parking funding mechanisms; Goal 19, Policy LU 19.5: Accommodate the development of bicycle parking centers in the Central District, Transit Villages, and Neighborhood Villages and require larger development projects to incorporate secured and convenient bicycle parking facilities; Goal 31, Policy 31.5: Increase the network of transit, walking, and bicycling opportunities between sub-areas within the Central District through expanded services, additional rights of way/pathways with corresponding signage; and Policy 33, Policy LU 33.5: Promote the redevelopment of the large commercially developed parcels with a network of internal pedestrian ways and sidewalks along which buildings will be clustered, establishing a smaller, walkable block grid comparable to the Central District.</i> Still, the GP EIR concluded that with buildout of the proposed General Plan Update, including buildout of the CDSP area, community-wide GHG emissions would not meet the long-term GHG reduction goal under Executive Order S-03-05. As such, new development under buildout of the proposed CDSP Update would be subject to the policies of the City’s current Climate Action Plan, which was adopted in 2018 to fulfill the requirements under GP EIR Mitigation Measure 5-1, as well as additional climate action/GHG reduction plans established locally, state-wide, or federally at the time.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

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IX. HAZARDS AND HAZARDOUS MATERIALS <i>Would the project:</i>						
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	LTS	No	No	No	No
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?	LTS	LTS	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	LTS	No	No	No	No
d) Be located on a site that 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?	LTS	LTS	No	No	No	No

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>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 for people residing or working in the project area?</p>	<p>NI</p>	<p>NI (IS)</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?</p>	<p>LTS</p>	<p>LTS (IS)</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>	<p>LTS</p>	<p>LTS</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</p>	<p>LTS</p>	<p>LTS</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>Discussion:</p> <p>The GP EIR found that buildout in accordance with the General Plan Update would involve the transport, use, and/or disposal of hazardous materials; however, impacts would be less than significant as construction would be short-term and in compliance with California Health and Safety Code, Occupational Safety and Health Administration (OSHA), and SCAQMD regulations; project operations would reduce industrial uses compared to existing conditions and new development would comply with the City’s Safety Element. The GP EIR found that 844 hazardous material sites fall within the City or within a 0.25-mile radius thereof; however, compliance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), California Code of Regulations, Title 22, and related requirements, as well as adherence to the City’s Land Use Element Policy LU 3.5 Hazardous Uses would bring the impact level to less than significant. The GP EIR concluded that project development could affect the implementation of an emergency response or evacuation plan due to population growth, development intensity, and road closures during construction; however, coordination with the Pasadena Fire Department (PFD) and compliance with the Los Angeles County Operational Area Emergency Response Plan and the City’s Emergency Operation Plan would ensure each project and buildout of the General Plan Update has a less than significant impact related to this topic. Finally, the GP EIR found that areas of the City near very high fire hazard severity zones could expose structures and/or residences to fire hazards during buildout of the General Plan Update. However, compliance with the International Fire Code, California Fire Code, and the City’s Safety Element would ensure that future development under the General Plan Update would not expose people or structures to substantial wildfire hazards, and impacts would be less than significant. The IS prepared for the GP EIR found that no portion of the City is located within an airport land use plan or within two miles of an airport, and no related impact would occur. Furthermore, the IS prepared for the GP EIR concluded that the General Plan Update would not allow development of buildings with increased height that affect flight patterns or pose a safety hazard, and related impacts would be less than significant.</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>Similar to the buildout analyzed in the GP EIR, construction under the proposed CDSP Update could potentially involve the transport, use, and/or disposal of hazardous materials. However, the further regulation of land uses under the proposed CDSP Update would reduce industrial uses compared to existing conditions. Additionally, construction associated with individual development projects under buildout of the CDSP Update would be temporary in nature, and development would comply with the California Health and Safety Code, OSHA, and SCAQMD regulations. The CDSP Update is not expected to result in significant impacts related to the transport, use, and/or disposal of hazardous materials. The GP EIR did not list any hazardous material sites in the CDSP area; however, if a site were to be located with a 0.25-mile radius of the CDSP area, future development would be required to comply with CERCLA, RCRA, California Code of Regulations, Title 22, and related requirements, as well as adhere to the City’s Land Use Element Policy LU 3.5: Hazardous Uses. As a result, hazardous material-related impacts would be less than significant. Future development under buildout of the CDSP Update could result in temporary road closures. Similar to the GP Update analyzed in the GP EIR, future development under buildout of the CDSP Update would be required to coordinate with the PFD. Additionally, buildout of the CDSP Update would not interfere with the Los Angeles County Operational Area Emergency Response Plan or the City’s Emergency Operation Plan. Furthermore, no future development project would be permitted to block any designated evacuation routes. Therefore, similar to the GP EIR, the CDSP Update is not expected to significantly affect the implementation of an emergency response or evacuation plan.</p> <p>The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts to wildfire for those areas located within or near a state responsibility area or on lands classified as Very High Fire Hazard Severity Zones. The proposed CDSP Update is not located within a Very High Fire Hazard Severity Zone for local and state responsibility areas, and no impact would occur.¹⁰</p>						

¹⁰ City of Pasadena. 2015 General Plan EIR. Figure 5.6-1, *Fire Hazard Severity Zones*.

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

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X. HYDROLOGY AND WATER QUALITY <i>Would the project:</i>						
a) Violate any water quality standards or waste discharge requirements?	LTS	LTS	No	No	No	No
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	LTS	LTS	No	No	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	LTS	LTS	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Raises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or offsite?	LTS	LTS	No	No	No	No
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	LTS	LTS	No	No	No	No
f) Otherwise substantially degrade water quality?	LTS	LTS	No	No	No	No
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or dam inundation area as shown in the City of Pasadena adopted Safety Element of the General Plan or other flood or inundation delineation map?	LTS	LTS	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	NI	NI (IS)	No	No	No	No
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	LTS	LTS	No	No	No	No
j) Inundation by seiche, tsunami, or mudflow?	LTS	LTS	No	No	No	No

Discussion:

The GP EIR found that buildout of the General Plan Update could increase the amount of impervious surface in the City of Pasadena resulting in an increase in surface water flows into drainage systems within the watershed, potentially resulting in erosion, siltation, and/or flooding. However, the City is primarily developed and urbanized, and development would be required to adhere to applicable local, state, and federal regulations and standards, as well as implement site design measures, low-impact development, and best management practices (BMPs), including infiltration features that contribute to groundwater recharge and minimize stormwater runoff, erosion, siltation, and/or flooding. As such, these impacts would be less than significant. The GP EIR stated that General Plan Update buildout would involve some increase in residential density in the East Pasadena Specific Plan area within the dam inundation zone for Eaton Wash Dam; however, the limited water behind the Eaton Wash Dam combined with the implementation of evacuation plans as required by the City’s Safety Element would make the impact to risk of loss, injury, or death in the case of dam failure less than significant. The GP EIR found that during the construction phases of projects developed under the General Plan Update, there is the

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>potential for short-term unquantifiable increases in storm water pollutant concentrations; and during operation of such projects, the quality of storm runoff (sediment, nutrients, metals, pesticides, pathogens, and hydrocarbons) may be altered. Compliance with applicable local, state, and federal regulations would reduce water quality impacts associated with construction and operational impacts related to stormwater pollution and water quality to less than significant levels. While the GP EIR found that portions of the City are susceptible to inundation by mudflows, none of the proposed development under the General Plan Update fell within these susceptible areas, and the impact was found to be less than significant. The IS prepared for the GP EIR found that no portions of the City of Pasadena are located within a 100-year floodplain and, therefore, no impact related to floodplains would occur.</p> <p>The proposed CDSP Update would further restrict land uses from those analyzed in the CDSP area in the GP EIR and would establish additional development/design standards. The CDSP area is currently developed and urbanized. New development under the buildout of the proposed CDSP Update would be subject to applicable local, state, and federal regulations and standards pertaining to water quality, waste discharges, and hydraulic hazard risk reduction. Impacts to hydrology and water quality would be less than significant. Furthermore, as indicated in the IS prepared for the GP, no portion of the City, including the CDSP area, is located within a 100-year floodplain. Therefore, the proposed CDSP Update would not place structures within the flow of a 100-year flood and no impact would occur.</p> <p>The current CEQA Guidelines Appendix G checklist also recommends considering a project’s potential to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As previously discussed, new development under the buildout of the proposed CDSP Update would be subject to applicable water quality regulations. Additionally, no development in the CDSP area would include the extraction of groundwater. Therefore, the proposed CDSP Update would not conflict with the implementation of a water quality control plan or sustainable groundwater management plan, and the impact would be less than significant.</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

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XI. LAND USE AND PLANNING <i>Would the project:</i>						
a) Physically divide an established community?	LTS	LTS (IS)	No	No	No	No
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	LTS	No	No	No	No
c) Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?	NI	NI (IS)	No	No	No	No
Discussion: The IS prepared for the GP EIR found that land use changes proposed within the specific plan areas are intended to be integrated into the existing uses and surrounding neighborhoods. As such, the General Plan update would not physically divide an existing community and the impact would be less than significant. The GP EIR compared the General Plan Update’s proposed land use changes - including proposed net increases in development and new policies pertaining to building intensity and urban design - to existing land uses in the City and concluded that possible direct impacts to land use and planning would be less than significant. As found by the GP EIR and						

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<p>in accordance with California Government Code Section 65302, the General Plan Update would address two of the seven required Elements: Land Use and Mobility. The GP EIR also found that the General Plan Update would be consistent with the SCAG RTP/SCS, as is required. It was concluded that implementation of the General Plan Update would result in a net increase of 12,312 additional residential dwelling units and 10,988,959 square feet of nonresidential uses; this net increase would be framed and regulated by the goals and policies of the City’s Land Use and Mobility Elements. Changes to prior land use designations proposed by the General Plan Update primarily allowed for more mixed-use and redevelopment of existing industrial uses for more integrated non-residential land uses that would foster local goods and services and business in the City. Buildout capacity would be limited by the following standards for density (du/ac) and Floor Area Ratio (FAR): commercial uses with FARs between 0.0 and 3.0; Research and Development designations (which would replace the Industrial designation) with FARs of 0.9 and 0.0-1.25, respectively; Low Mixed Use (0.0–1.0 FAR, 0–32 du/ac), Low Medium Mixed Use (0.0– 1.75 FAR, 0–48 du/ac), Medium Mixed Use (0.0–2.25 FAR, 0–87 du/ac), and High Mixed Use (0.0–3.0 FAR, 0–87 du/ac). The GP EIR concluded that modifying land use designations and the corresponding buildout would create a positive live/work environment, which would enhance quality of life while reducing environmental impacts related to consumption, pollution, and emissions due to transit orientation, reduced commutes, and improved multi-modal options. Moreover, the GP EIR found that additional goals and policies added to the Land Use and Mobility Elements by the General Plan Update would ensure new development would be compatible with the existing character of the City while enhancing urban design and regulating sustainable growth. The GP EIR stated that in addition to the goals and policies of the Land Use and Mobility Elements, new development would also be required to comply with Title 17 (Zoning Code) of the City’s Municipal Code and applicable design guidelines. The GP EIR stated that additional environmental impacts from changes to land use patterns and building intensity and design, such as impacts to air quality, hazards, flooding, and traffic, would be addressed individually in each corresponding section. As such, the GP EIR found that the proposed updates would not conflict with any existing applicable policies or regulations and would be implemented in such a way that creates compatibility within the plan area; impacts to land use and planning were determined to be less than significant in the GP EIR. Additionally, the IS prepared for the GP EIR found that there are no adopted habitat conservation</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>or natural community conservation plans within the City and, as such, concluded that no impacts to such plans would result from the General Plan Update.</p> <p>The proposed CDSP Update would have similar land use objectives as the GP EIR and includes further regulations around land uses and establishment of additional development/design standards to reflect development patterns within the CDSP area that have occurred since adoption of the General Plan Update. Similar to the General Plan Update, the CDSP Update is intended to be integrated into the existing uses and surrounding neighborhoods and would not physically divide an established community. The CDSP proposes ten zoning districts within the plan area that would allow for the creation of transit-oriented, mixed-use activity centers surrounding the Metro A Line that supports local housing options and encourages commercial uses that provide local jobs, goods, and services. The intention of this updated approach to land use regulation would support a mixed-use area that is walkable, and serves more workers and transit users. The City’s General Plan Land Use Element designates a range of intensities and densities in the CDSP area to support the vision of a series of pedestrian-oriented villages and districts with unique identities, bolstered by their vibrant mix of uses, amenities, and streetscapes. The Specific Plan generally implements the allowed density ranges and intensity set by the General Plan Land Use Diagram and regulates density within the maximum density studied by the General Plan EIR. The additional development/design standards would further the goals set forth in the Land Use and Mobility Elements as well as the objectives presented in the GP EIR; additionally, buildout of the CDSP Update would be within the General Plan buildout analyzed in the GP EIR. The CDSP Update would not conflict with Title 17 (Zoning Code) of the City’s Municipal Code, California Government Code Section 65302, or SCAG’s RTP/SCS. Furthermore, as indicated in the IS prepared for the GP, that there are no adopted habitat conservation or natural community conservation plans within the City. Therefore, the proposed CDSP would not result in impacts to any such plans.</p> <p>As discussed in Chapter 2, Project Description, the CDSP Update would remove parcels south of California Boulevard at Lake Avenue, and add portions of two blocks between Mentor and Wilson Avenues north of Cordoba Street as mixed-use areas. In addition, the CDSP Update would allow residential and mixed-uses along sections of Lake Avenue previously designated for commercial uses only.</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>The CDSP Update also includes one new land use type: Vehicle Services, Automobile Showrooms. No development of such use is proposed under the CDSP Update, rather, the CDSP Update defines this use and future development of this new land use type would occur in compliance with policies and regulations set forth under the updated CDSP, once adopted, and the Pasadena Municipal Code. Additionally, the Zoning Code would be amended to incorporate a new CDSP ordinance to regulate zoning consistent with the General Plan, replacing the existing Pasadena Municipal Code Chapter 17.30. Furthermore, as previously discussed, buildout of the CDSP Update would be within the General Plan buildout analyzed in the GP EIR. Therefore, the updated CDSP boundary and the new land use type proposed under the CDSP Update would not result in significant land use and planning impacts.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
XII. MINERAL RESOURCES <i>Would the project:</i>						
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?	NI	NI (IS)	No	No	No	No
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?	NI	NI (IS)	No	No	No	No
<p>Discussion:</p> <p>Mineral resources were addressed in the IS prepared for the GP EIR, which concluded that there would be no impact to mineral resources following implementation of the General Plan Update.¹¹ The IS states that there is no active mining in the City. Based on the California Geological Survey and as stated in the IS, the Eaton Wash and Arroyo Seco Wash are classified as Mineral Resource Sectors and may contain mineral resources within the City, but neither contain active mines or reserves, and buildout of the General Plan Update would not result in development in either area. Additionally, there are no mineral resource recovery sites in the City. As the proposed CDSP Update would occur within the same boundaries as those analyzed in the GP EIR and it is not located within any of the identified Mineral Resource Sectors, the proposed CDSP area would not contain mineral resources or develop on Mineral Resource Sectors.</p>						

¹¹ City of Pasadena, Initial Study/Notice of Preparation, 2013.

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
XIII. NOISE <i>Would the project result in:</i>						
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	LTS	No	No	No	No
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	S-U	S-U	No	No	No	No
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	LTS	LTS	No	No	No	No
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	S-U	S-U	No	No	No	No
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	NI	NI (IS)	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
or public use airport, would the project expose people residing or working in the project area to excessive noise levels?						
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	LTS	LTS (IS)	No	No	No	No

Discussion:

The GP EIR analyzed impacts to noise from construction and operation of buildout of the General Plan Update, including stationary noise, traffic noise, rail noise, industrial noise, and affiliated levels of vibration. The GP EIR assessed the updates for compatibility with the City’s Land Use and Noise Elements. The GP EIR concluded that increased stationary and traffic noises from buildout would have a less than significant impact; if residential and sensitive land uses continue to be developed in compatible areas, and those uses that are compatible with transportation noises are developed in compliance with the Noise and Land Use Elements, as well as other state and local regulations pertaining to noise, then this impact would be less than significant as well. Regarding exposure to long-term groundborne vibration, the GP EIR found that both rail and industrial uses could cause a potentially significant impact. Portions of the City are designated for and operated as industrial uses. Mitigation Measure 9-1 requires all industrial projects to submit a vibration study providing evidence that vibration-causing activity would not exceed levels set forth by the Federal Transit Administration (FTA). The City of Pasadena is served by the Metro A Line. The portion of this line in the City runs north-south parallel to Arroyo Parkway and then turns to an east-west orientation along I-210, with its current terminus in the City of Azusa. Mitigation Measure 9-2 requires all new development within screening distance of the ALine to submit a study conducted by an acoustical engineer to the City’s Planning Division that identifies vibration impacts and possible reduction measures, if needed. Implementation of Mitigation Measures 9-1 and

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<p>9-2 would reduce groundborne vibration impacts to a less than significant level. The GP EIR concluded that short-term impacts from construction vibration would be significant and unavoidable for buildout of the General Plan Update; Mitigation Measure 9-3 would reduce impacts to sensitive receptors within 25 feet of activity by substituting less intensive equipment when possible and utilizing vibration reduction techniques; however, because each new development involved in the buildout is project-specific, the GP EIR determined it is not possible to mitigate this impact below a significant and unavoidable level. Mitigation Measure 9-4 further addresses vibrations from construction on sensitive architectural structures within 25 feet of activity; yet, similar to construction vibration impacts to sensitive receptors, this impact would remain significant and unavoidable in the context of total buildout as each project would present individual circumstances. Mitigation Measure 9-5 requires all construction permits be issued only after submission of a plan for noise and vibration reducing BMPs for all development within 500 feet of a noise-sensitive receptor; nevertheless, the GP EIR concluded that this mitigation measure would not reduce the impacts of construction activities to a less than significant level as the phasing, location, and magnitude of future development under buildout is unknown. Therefore, the GP EIR concluded that construction related noise impacts are significant and unavoidable. The IS prepared for the GP EIR found that no portion of the City is located within an airport land use plan or within two miles of an airport, and no impact would occur. Furthermore, the IS prepared for the GP EIR concluded that noise from helicopter flights would be periodic and, thus, the impact resulting from noise from private use heliports would be less than significant.</p> <p>Buildout of the proposed CDSP Update could have potentially significant noise impacts due to construction-related noise and vibration, as the phasing and location of future projects are currently unknown. However, similar to the updates analyzed under the GP EIR, the proposed CDSP Update would implement GP EIR Mitigation Measures 9-3 through 9-5 to ensure activity within the vicinity of sensitive land uses, receptors, and architectural structures is compliant with FTA criteria and that BMPs are utilized throughout the construction phase of each future development project. As the proposed CDSP Update would not support the development of industrial uses within the CDSP area, the proposed CDSP Update would not create impacts to vibration from this use. The proposed CDSP area is adjacent to the Metro A Line and therefore would be subject to noise and vibration levels from rail use. As such, the proposed CDSP Update would implement GP EIR Mitigation Measures 9-2 to assess vibration impacts from rail use and implement reduction measures. As</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>indicated in the IS prepared for the GP, there are no airports within two miles of the City. Therefore, the proposed CDSP Update would not result in noise impacts related to an airport land use plan or public airport. Furthermore, similar to the General Plan Update, helicopter flights within the CDSP area would be periodic and, as the proposed CDSP Update would have no effect on helicopter usage or flight patterns, it would cause no new helicopter noise impacts.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
XIV. POPULATION AND HOUSING <i>Would the project:</i>						
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	LTS	No	No	No	No
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	LTS	LTS (IS)	No	No	No	No
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	LTS	LTS (IS)	No	No	No	No
Discussion: The GP EIR concluded that, while population, housing, and employment growth induced by buildout of the General Plan update would likely surpass SCAG’s forecast, the impact of buildout would be less than significant. The General Plan Update accommodates growth in all sectors; it permits new housing opportunities, and it opens more opportunities for employment. The GP EIR found that the City-wide utilities and infrastructure required to service the projected buildout population would be sufficient, and each service is discussed in more detail within its individual section of this document (i.e. Hydrology and Water Quality, Public Services, Transportation and						

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<p>Traffic, Utilities and Service Systems). One of the central objectives of the General Plan Update is to create a housing/job balance within a more work/live environment; the GP EIR found that buildout would achieve this goal, which would offset the detrimental impacts that growth would have. The IS prepared for the GP EIR found that the General Plan Update would increase the number of dwelling units by allowing higher intensity residential uses and mixed-use development and that growth in accordance with the proposed General Plan Update was not expected to displace existing housing or people, as the General Plan Update would increase the number of dwelling units by allowing higher intensity residential uses and mixed-use development. Therefore, the IS concluded that the impacts related to displacement of housing and people would be less than significant.</p> <p>The CDSP area previously analyzed by the GP EIR shares the same objective of creating a more balanced housing/job ratio. Since the GP EIR was certified, changes in development patterns within the CDSP have resulted in more opportunities for multifamily residential uses and mixed-use development, further achieving this goal. The CDSP area is primarily built out under existing conditions and buildout of the proposed CDSP Update would not exceed the projected growth analyzed in the GP EIR. Additionally, buildout of the CDSP Update would be within the General Plan buildout analyzed in the GP EIR. Therefore, similar to the GP EIR, the CDSP Update would not displace substantial numbers of housing or people, and the impacts would be less than significant.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
<p>XV. PUBLIC SERVICES</p> <p><i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i></p>						
a) Fire protection?	LTS	LTS	No	No	No	No
b) Police Protection?	LTS	LTS	No	No	No	No
c) Schools?	LTS	LTS	No	No	No	No
d) Libraries?	LTS	LTS	No	No	No	No
<p>Discussion:</p> <p>The General Plan Update area is within the City of Pasadena and is serviced by the PFD, Pasadena Police Department (PPD), Pasadena Unified School District (PUSD), and the Pasadena Public Library (PPL). The PFD operates eight stations throughout the City, with an average daily staff of 51. The GP EIR found that, while population growth and increased infrastructure from buildout of the General Plan Update would result in higher demand for service from the PFD and possibly require new or expanded facilities, compliance with existing regulations and coordination during road closures related to future construction would ensure impacts remain less than significant. The PPD aims to employ 1.63 officers per capita and 0.72 officers per 1,000 residents. The GP EIR found that, while population growth and increased infrastructure from buildout of the General Plan Update would result in higher demand for service from the PPD and possibly require new or expanded facilities, compliance with existing regulations would ensure impacts remain less than significant. The GP EIR concluded that while population growth from buildout of the General Plan Update would create new students in the population, it is unlikely that forecasted growth would exceed the capacity of existing facilities; additionally, per SB 50, all new development in the City is subject to a School Impact Fee to ensure that school services continue to meet the needs of the population. The PPL operates 10 facilities, all within 1 mile or walking distance of each residence. The GP EIR found that while</p>						

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<p>buildout of the General Plan update would induce population growth, the estimated growth would not exceed the PPL’s capacity to serve the community; additionally, all new development is subject to fees and taxes that fund public services, including a Library Special Tax, to ensure continued funding for the PPL. The GP EIR concluded that all impacts to public services would be less than significant.</p> <p>The proposed CDSP Update would further restrict land uses from those analyzed in the GP EIR and establish additional development/design standards. The CDSP area is primarily built out under existing conditions and buildout of the proposed CDSP Update would not exceed the projected growth analyzed in the GP EIR. Additionally, buildout of the CDSP Update would be within the General Plan buildout analyzed in the GP EIR. Therefore, the proposed CDSP Update is not anticipated to increase demand for public services beyond the level analyzed in the GP EIR, and impacts would be less than significant.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

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XVI. RECREATION <i>Would the project:</i>						
a) Would the project result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?	LTS	LTS	No	No	No	No
b) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTS	LTS	No	No	No	No
c) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might	LTS	LTS	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
have an adverse physical effect on the environment?						
<p>Discussion:</p> <p>The City’s Municipal Code does not dictate a resident/acreage ratio for parkland and open space. While buildout of the General Plan Update would induce population growth and likely increase demand for parkland and open space and potentially result in the deterioration of existing facilities, the GP EIR found that improvements to existing and development of new open space and recreation amenities included in buildout, in conjunction with the Residential Impact Fee that each new development would be subject to as well as other in-lieu fees, impacts would be less than significant. The GP EIR concluded that the increase in population projected by buildout of the General Plan Update would increase demand for parkland, open space, and recreational facilities; increased use could deteriorate existing facilities or require the development of additional facilities. The GP EIR found that land uses permitting parkland, open space, and recreational activities would not be converted and that there would be opportunities for additional facilities to be built. All residential development under the buildout of the GP Update would be required to pay a Residential Impact Fee; any type of project that acquires open space would also be subject to in-lieu fees. As such, the GP EIR found that impacts to recreation would be less than significant with adherence to existing regulations, including payment of applicable fees.</p> <p>The proposed updates to the CDSP would include open space requirements that would support high quality, accessible and usable open space across a variety of types that contribute to an active public realm. Residential open space would be required according to the number of bedrooms, resulting in units with more bedrooms having a larger open space requirement. Required open space may be private to individual units or common among tenants. Projects with more than 40,000 square feet of non-residential floor area shall provide a minimum of five percent of the gross non-residential floor area as common open space. In addition, projects with more than 80,000 square feet of gross floor area shall provide a percentage of gross floor area as publicly accessible open space. Specific locations have been identified to require a plaza or linear public space to increase pedestrian activity, or a paseo to reduce block sizes</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>and provide better pedestrian access to destinations if the associated parcels redevelop as part of the publicly accessible open space requirement. Similar to future development projects under the GP EIR, new development under the proposed CDSP Update would comply with the City’s Municipal Code, Residential Impact Fees, and any other in-lieu and/or acquisition fees to ensure a less than significant impact to parks and recreation.</p> <p>Additionally, the proposed plan incorporates the redesignation of three existing public spaces as Open Space in the General Plan Land Use Diagram: two areas around Centennial Square at the intersection of Garfield Avenue and Holly Street, and one known as Playhouse Village Park on Union Street between N. El Molino Avenue and N. Oak Knoll Avenue.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
XVII. TRANSPORTATION/TRAFFIC <i>Would the project:</i>						
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	LTS-M(GP)	LTS-M	No	No	No	No
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	LTS	S-U	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	NI	NI (IS)	No	No	No	No
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTS	LTS	No	No	No	No
e) Result in inadequate emergency access?	LTS	LTS	No	No	No	No
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	LTS-M(GP)	LTS-M	No	No	No	No
<p>Discussion:</p> <p>The GP EIR analyzed the General Plan Updates for impacts to traffic and transportation based on calculations for vehicle miles traveled (VMT) per capita, vehicle trips (VT) per capita, proximity and quality of bicycle networks, proximity and quality of transit networks, and pedestrian accessibility, as well as compatibility with the City’s Mobility Element. The GP EIR concluded that implementation of the General Plan Update would not conflict with the City’s plans, ordinances, or policies establishing measures of effectiveness for the</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>performance of the complete circulation system, and complies with adopted policies, plans, and programs for alternative transportation. It found that transportation performance would improve, and pedestrian and bicycle accessibility would increase from buildout of the General Plan Update, which would satisfy Mobility Plan goals around livability, non-motorized transit, and economic viability. The GP EIR stated that all improvements within the City are funded through the City’s transportation fee program with the exception of bicycle and pedestrian improvements. The proposed General Plan Update included Policy 2.10, requiring the City to amend the existing transportation impact fee to include pedestrian and bicycle improvements. The GP EIR concluded that without full funding of circulation improvements, the General Plan Update would result in a significant impact. As such, Mitigation Measure 13-1 was identified in the GP EIR, which required the City to update the transportation impact fee program in place at the time the GP EIR was prepared by 2020 to ensure that impacts to traffic and transportation resulting from buildout of the General Plan Update remain less than significant. The City implemented Mitigation Measure 13-1 and updated the transportation impact free program, as mandated by AB 1600 legislation, as codified by California Code Government Section 66000 et seq. The GP EIR found that buildout traffic conditions would result in designated road and/or highways exceeding county congestion management program thresholds, resulting in a significant project impact at the intersection of Pasadena Avenue at California Boulevard during the AM peak hour; impacts at all other intersections under Metro’s Congestion Management Program (CMP) would be less than significant. The GP EIR also identified significant impacts at two CMP Freeway Mainline Segments on I-210. The GP EIR concluded that there was no feasible mitigation to reduce CMP impacts to a less than significant level, as improvements to road capacity would require changes to road infrastructure, which would have secondary impacts such as loss of bicycle lanes, parking, sidewalk space, etc. that would conflict with General Plan goals and policies and would cause other impacts to traffic and transportation. As such, this impact was determined to be significant and unavoidable. Finally, the GP EIR found that under buildout, project circulation improvements would be designed to adequately address potentially hazardous conditions (sharp curves, etc.), potential conflicting uses, and emergency access. The IS prepared for the GP EIR found that no portion of the City is located within an airport land use plan or within two miles of an airport. As such, the General Plan Update would not affect air traffic patterns and no impact would occur.</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>Roadways and mobility within the proposed CDSP area were analyzed within the GP EIR; the proposed CDSP Update does not include modifications to roadways and infrastructure outside of the project area analyzed in the GP EIR. While the modifications within the proposed CDSP would permit more residential units and uses, thus accommodating population growth, like the GP EIR concluded, the circulation improvements to which the proposed CDSP would contribute – improved sidewalk zones, bicycle and pedestrian accessibility, parking, proximity to live/work/shop for residents, allowing more residential and mixed-use development in close proximity to the Metro A Line station – would be beneficial for the community and City as a whole. Further, per GP EIR Mitigation Measure 13-1, each project developed under buildout of the proposed CDSP Update would be subject to whatever transportation impact fee is in effect at the time of permitting, thus ensuring that funds for future improvements would be available. Additionally, the proposed CDSP Update would support the Department of Transportation’s Bicycle Transportation Action Plan by reinforcing pedestrian-friendly design and development and requiring bicycle parking. As such, and considering the availability of transit, bicycle, and pedestrian facilities in the CDSP area, impacts from the CDSP Update related to proximity and quality of bicycle networks, proximity and quality of transit networks, pedestrian accessibility, and mixed-uses in proximity to the Metro A Line would be less than significant. According to the GP EIR, the proposed CDSP area does not include CMP intersections where traffic impacts would occur. Regardless, the Los Angeles County CMP has been dissolved. Additionally, as indicated in the IS prepared for the GP EIR, there are no airports within two miles of the City. Therefore, the proposed CDSP Update would not affect air traffic patterns and no impact would occur.</p> <p>The current CEQA Guidelines Appendix G checklist also recommends considering a project’s potential to conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which requires the use of VMT as the updated measurement of traffic impacts, replacing the level of service (LOS) method previously used. As discussed, the GP EIR included a City-wide VMT analysis for impacts to traffic and transportation based on calculations for VMT per capita and VT per capita. The analysis used the City of Pasadena Travel Demand Forecasting (TDF) Model, which was validated to 2013 traffic conditions and later updated to reflect 2017 conditions. Both the 2013 and 2017 models assumed that the I-710 extension would be constructed by 2035, which is no longer a valid assumption.</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>As such, an assessment was conducted to update the model to reflect the 2035 horizon year without the I-710 extension.¹² This assessment concluded that there were no substantial deviations from the VMT and VT analyses with the removal of the I-710 from the model. Thus, both versions of the Pasadena TDF Model are consistent with the changes to the CEQA metrics establishing VMT as the measurement of traffic impacts. Additionally, buildout of the CDSP Update would be within the General Plan buildout analyzed in the GP EIR. As such, the VMT analysis previously prepared for the GP EIR would also be applicable to the CDSP Update. Further, it should be noted that there is no development project identified under the proposed CDSP Update. Rather, future development projects would implement the land use and design modifications proposed in the CDSP Update. Future residential development projects consisting of 50 or more dwelling units and non-residential development projects greater than 50,000 square feet in size would be required to include a VMT assessment as part the environmental documentation prepared for that project. As such, the proposed CDSP Update would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and the impact would be less than significant.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur, nor would the significant unavoidable impacts identified in the GP EIR be worsened. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

¹² Pasadena Future Year TDF Model Update and New VMT/VT Metrics Memorandum, Fehr & Peers, October 2020.

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
XVIII. UTILITIES AND SERVICE SYSTEMS <i>Would the project:</i>						
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	LTS	LTS	No	No	No	No
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	LTS	LTS	No	No	No	No
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	LTS	LTS	No	No	No	No
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	LTS	LTS	No	No	No	No

Issues and Supporting Data Sources:	CDSP Update Impact Conclusion	GP EIR Impact Conclusion	Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?	Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?	Are Any New Mitigation Measures Required for the CDSP Update?
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	LTS	No	No	No	No
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	LTS	LTS	No	No	No	No
g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	NI	NI (IS)	No	No	No	No
<p>Discussion:</p> <p>The GP EIR found that regarding wastewater treatment and collection, services provided by the Sanitation Districts of Los Angeles County, Los Angeles County Public Works Department, and PWP would adequately manage wastewater generated by buildout of the General Plan Update. Upon implementation of regulatory requirements and standard conditions of approval, such as payment of development fees and implementation of a site-specific Storm Water Pollution Preventions Plan for construction, the impact would be less than significant. Regarding water supply and distribution, the GP EIR found that buildout of the General Plan Update would fall within projections for PWP's capacity; project requirements would be met by current services provided by PWP. Upon implementation</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>of regulatory requirements and standard conditions of approval, such as implementation of mandatory conservation measures, requiring the preparation of a Water Supply Assessment for development projects meeting certain size criteria, and requiring affirmative verification of sufficient water supply for certain residential subdivisions pursuant to SB 221, the impact would be less than significant. Regarding solid waste, the GP EIR found that project buildout would be accommodated by existing service providers and facilities. Upon implementation of regulatory requirements and standard conditions of approval, such as the inclusion of storage areas for recyclable materials at future nonresidential and multifamily residential development projects pursuant to AB 341, recycling at least 50 percent of construction and demolition waste pursuant to the California Green Building Code, and solid waste reduction strategies under General Plan Policies 10.2 and 10.4, the impact would be less than significant. Regarding other utilities, including electricity, natural gas, and communications, the GP EIR concluded that future development under the General Plan Update would be accommodated by existing service providers, and the impact would be less than significant. The GP EIR found that the project satisfied and complied with the City’s adopted General Plan Open Space and Conservation Element pertaining to water conservation, General Plan Safety Element pertaining to continued earthquake strengthening for utilities and protection of water supply, and state codes and regulations pertaining to utility services, and that the proposed updates to the General Plan Land Use Element regarding energy and water efficiency and conservation and solid waste reduction would create more sustainable standards for the future of the City. The IS prepared for the GP EIR found that buildout of the General Plan Update would be required to comply with all applicable solid waste regulations, including the California Integrated Waste Management Act and the City of Pasadena Zoning Code Section 17.40.120 (Refuse Storage Facilities and, as such, no impact related to compliance with solid waste regulations would occur.</p> <p>The proposed CDSP area is within the area analyzed by the GP EIR, and the same service providers would manage utility services for future development projects under the proposed CDSP Update. The proposed CDSP Update would further restrict land uses from those analyzed in the GP EIR and establish additional development/design standards. The CDSP area is primarily built out under existing conditions and buildout of the proposed CDSP Update would not exceed the projected growth analyzed in the GP EIR. Additionally, buildout of the CDSP Update would be within the General Plan buildout analyzed in the GP EIR. Therefore, the proposed CDSP Update is not anticipated to exceed the capacity of existing utility facilities and no new or expanded facilities are anticipated to</p>						

<p>Issues and Supporting Data Sources:</p>	<p>CDSP Update Impact Conclusion</p>	<p>GP EIR Impact Conclusion</p>	<p>Does the CDSP Update Involve New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New or Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts than those analyzed in the GP EIR?</p>	<p>Any New Information of Substantial Importance That Was Not and Could Not Have Been Known at the Time of Certification of the GP EIR that Rises to the Level of Requiring New Analysis or Verification?</p>	<p>Are Any New Mitigation Measures Required for the CDSP Update?</p>
<p>be needed to service build out of the CDSP. Similar to the General Plan Update, future projects implemented under the CDSP Update would be required to adhere to all applicable solid waste regulations. Therefore, implementation of the proposed CDSP Update would have no impact related to compliance with solid waste regulations.</p> <p>The current CEQA Guidelines Appendix G checklist also includes assessment criteria for potential impacts related to the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities. Similar to water, wastewater, and solid waste facilities, existing service providers would manage electricity, natural gas, and telecommunications services for projects under the proposed CDSP Update. As discussed, the CDSP area is primarily built out under existing conditions. Thus, it is anticipated that any new development in the CDSP area would require lateral connections to mainlines in coordination with utility service providers, similar to what occurs under existing conditions. Therefore, the CDSP Update would result in less than significant impacts related to the relocation or construction of new or expanded electric power, natural gas, and telecommunications facilities.</p> <p>No new significant impacts and no substantial increase in the severity of previously identified impacts associated with the proposed project would occur. Likewise, there is no new information of substantial importance requiring new analysis or verification. The project does not propose substantial changes that require major revisions to the GP EIR, and no new mitigation measures are required.</p>						

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Environmental Determination

Based upon the evidence in light of the whole record documented in the attached environmental checklist explanation, cited incorporations and attachments, I find that the Project:

- Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. The proposed project is a component of the whole action analyzed in the previously adopted/certified CEQA document.
- Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. Changes and additions to the earlier CEQA document are needed to make the previous documentation adequate to cover the project which are documented in this Addendum (CEQA Guidelines §15164). However, none of the conditions described in CEQA Guidelines Section 15162 that would require the preparation of a subsequent EIR have occurred.
- Has previously been analyzed** as part of an earlier CEQA document (which either mitigated the project or adopted impacts pursuant to findings) adopted/certified pursuant to State and City CEQA Guidelines. However, there is important new information and/or **substantial changes have occurred** requiring the preparation of an additional CEQA document (Negative Declaration or EIR) pursuant to CEQA Guidelines Sections 15162 through 15163.

Prepared By _____ Date _____

Reviewed By _____ Date _____

Printed Name _____

Printed Name _____

Addendum approved on: _____

Approval attested to by: _____

Signature

Date

Printed Name

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CHAPTER 4 MITIGATION MEASURES

The mitigation measures listed below are from the Pasadena General Plan Final Environmental Impact Report and would be applicable to the proposed project. No new mitigation measures are required as a result of implementing the proposed project. The City, as the CEQA lead agency, is responsible for monitoring the implementation of the adopted mitigation measures.

Air Quality

2-1 Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions include, but are not limited to:

- Requiring fugitive-dust control measures that exceed SCAQMD's Rule 403, such as:
 - Use of nontoxic soil stabilizers to reduce wind erosion.
 - Applying water every four hours to active soil-disturbing activities.
 - Tarping and/or maintaining a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
 - Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
 - Ensuring that construction equipment is properly serviced and maintained to the manufacturer's standards.
 - Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
 - Using Super-Compliant volatile organic compound (VOC) paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufacturers can be found on the SCAQMD's website at http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf.
- **2-2** Prior to future discretionary project approval, development project applicants shall prepare and submit to the City of Pasadena Planning Division a technical assessment evaluating potential project operation phase-related air quality impacts.

The evaluation shall be prepared in conformance with SCAQMD methodology in assessing air quality impacts. If operation-related air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City of Pasadena Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities. The identified measures shall be included as part of the Standard Conditions of Approval. Below are possible mitigation measures to reduce long-term emissions:

- For site-specific development that requires refrigerated vehicles, the construction documents shall demonstrate an adequate number of electrical service connections at loading docks for plug-in of the anticipated number of refrigerated trailers to reduce idling time and emissions.
 - Applicants for manufacturing and light industrial uses shall consider energy storage and combined heat and power in appropriate applications to optimize renewable energy generation systems and avoid peak energy use.
 - Site-specific developments with truck delivery and loading areas and truck parking spaces shall include signage as a reminder to limit idling of vehicles while parked for loading/unloading in accordance with California Air Resources Board Rule 2845 (13 California Code of Regulations Chapter 10 § 2485).
 - Site-specific development shall demonstrate that an adequate number of electrical vehicle Level 2 charging stations are provided onsite. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by the Building Division prior to issuance of a Certificate of Occupancy.
 - Applicant-provided appliances shall be Energy Star appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the Building & Safety Division during plan check.
 - Applicants for future development projects along existing and planned transit routes shall coordinate with the City of Pasadena, Metro, and Foothill Transit to ensure that bus pads and shelters are incorporated, as appropriate.
- 2-3** Prior to future discretionary project approval, applicants for new industrial or warehousing land uses that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Pasadena Planning Division. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the South Coast Air Quality Management District. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective thresholds, as established by the SCAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms, are capable of reducing potential cancer and noncancer risks to an acceptable level. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs

identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

- 2-4** Prior to future discretionary approval, the City of Pasadena Planning Division shall evaluate new development proposals for sensitive land uses (e.g., residences, schools, and day care centers) within the City for potential incompatibilities with regard to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective (April 2005). In addition, applicants for siting or expanding sensitive land uses that are within the recommended buffer distances listed in Table 1-1 of the California Air Resources Board (CARB) Handbook shall submit a HRA to the City of Pasadena. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children. If the HRA shows that the incremental cancer risk and/or noncancer hazard index exceeds the respective thresholds, as established by the SCAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below the aforementioned thresholds as established by the SCAQMD), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes oriented away from high-volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.
- Heating, ventilation, and air conditioning systems for units that are installed with MERV filters shall maintain positive pressure within the building's filtered ventilation system to reduce infiltration of unfiltered outdoor air.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning Division. The intent of this mitigation measure is to reflect current CARB and SCAQMD Guidance/Standards as well as CEQA legislation and case law, and the City implementation of the measure shall adhere to current standards/law at the time such analyses are undertaken.

- 2-5** Prior to future discretionary approval, if it is determined that a project has the potential to emit nuisance odors beyond the property line, an odor management plan shall be prepared by the project applicant, subject to review and approval by the Planning & Community Development Director or their designee. Facilities that have the potential to generate nuisance odors include but are not limited to:

- Wastewater treatment plants
- Composting, green waste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters

- Food-processing facilities

The odor management plan shall show compliance with the South Coast Air Quality Management District's Rule 402 for nuisance odors. The Odor Management Plan shall identify the T-BACTs that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include but are not limited to scrubbers (i.e., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Biological Resources

- 3-1** The City of Pasadena shall require applicants of future development projects that disturb undeveloped land in the San Rafael Hills and tract of land at the northwest intersection of Crestford Drive and Florecita Drive, to prepare a biological resources survey. The survey shall be conducted by a qualified biologist and shall be a reconnaissance level field survey of the project site for the presence and quality of biological resources potentially affected by project development. These resources include, but are not limited to, special status species or their habitat, sensitive habitats such as wetlands or riparian areas, and jurisdictional waters. If sensitive or protected biological resources are absent from the project site and adjacent lands potentially affected by the project, the biologist shall submit a written report substantiating such to the City of Pasadena before issuance of a grading permit by the City, and the project may proceed without any further biological investigation. If sensitive or protected biological resources are present on the project site or may be potentially affected by the project, implementation of Mitigation Measure 3-2 shall be required.
- 3-2** A qualified biologist shall evaluate impacts to sensitive or protected biological resources from development. The impact assessment may require focused surveys that determine absence or presence and distribution of biological resources on the site. These surveys may include but are not limited to: 1) focused special status animal surveys if suitable habitat is present; 2) appropriately timed focused special status plant surveys that will maximize detection and accurate identification of target plant species; and 3) a delineation of jurisdictional boundaries around potential wetlands, riparian habitat, and waters of the United States or State. The results of these surveys will assist in assessing actual project impacts, and with the development of project-specific mitigation measures. Alternatively, the project applicant may forgo focused plant and animal surveys and assume presence of special status species in all suitable habitats on the project site. The qualified biologist shall substantiate the impact evaluation or the assumed presence of special-status species in all suitable habitats onsite in a written report submitted to the City of Pasadena before issuance of a grading permit by the City.
- 3-3** The City of Pasadena shall require applicants of development project to avoid potential impacts to sensitive or protected biological resources to the greatest extent feasible. Depending on the resources potentially present on the project site, avoidance may include: 1) establishing appropriate no-disturbance buffers around onsite or adjacent resources, and/or 2) initiating construction at a time when special status or protected animal species will not be vulnerable to project-related mortality (e.g., outside the avian nesting season or bat maternal or wintering roosting season). Consultation with relevant regulatory agencies may be required in order to establish suitable buffer

- areas. If the project avoids all sensitive or protected biological resources, no further action is required. If avoidance of all significant impacts to sensitive or protected biological resources is not feasible, the project shall implement Mitigation Measure 3-4.
- 3-4** The City of Pasadena shall require applicants to design development projects to minimize potential impacts to sensitive or protected biological resources to the greatest extent feasible, in consultation with a qualified biologist and/or appropriate regulatory agency staff. Minimization measures may include 1) exclusion and/or silt fencing, 2) relocation of impacted resources, 3) construction monitoring by a qualified biologist, and 4) an informative training program conducted by a qualified biologist for construction personnel on sensitive biological resources that may be impacted by project construction. If minimization of all significant impacts to sensitive or protected biological resources is infeasible, the project shall implement Mitigation Measure 3-5.
- 3-5** A qualified biologist will develop appropriate mitigations that will reduce project impacts to sensitive or protected biological resources to a less than significant level, if feasible. The type and amount of mitigation will depend on the resources impacted, the extent of the impacts, and the quality of habitats to be impacted. Mitigations may include, but are not limited to: 1) compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement; 2) purchase of appropriate credits from an approved mitigation bank servicing the Pasadena area; and 3) payment of in-lieu fees.
- 3-6** Applicants of projects developed pursuant to the General Plan Update shall obtain appropriate permit authorization(s) for impacts to jurisdictional waters, wetlands, and/or riparian habitats. The types of permits potentially required for impacts to jurisdictional waters are a Clean Water Act (Section 404) permit issued by the US Army Corps of Engineers, a California Water Certificate or Waste Discharge Order issued by the Regional Water Quality Control Board, and a Stream Alteration Agreement issued by the California Department of Fish and Wildlife.

Cultural Resources

- 4-1** If cultural resources are discovered during construction of land development projects in Pasadena that may be eligible for listing in the California Register for Historic Resources, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report including site record to the City and the South Central Coastal Information Center at California State University Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report.
- 4-2** The City shall require applicants for development permits that involve grading in areas within the paleontologically sensitive Topanga formation to provide studies by a qualified paleontologist assessing the sensitivity of the project for buried paleontological resources. On properties determined to be moderately to highly sensitive for paleontological resources, such studies shall provide a detailed mitigation

plan, including a monitoring program and recovery and/or in situ preservation plan, based on the recommendations of a qualified paleontologist. The mitigation plan shall include the following requirements:

- A paleontologist shall be retained for the project and will be on call during grading and other significant ground-disturbing activities more than six feet below the ground surface.
- Should any potentially significant fossil resources be discovered, no further grading shall occur in the area of the discovery until the Planning and Community Development Director concurs in writing that adequate provisions are in place to protect any significant resources. Work may continue outside a minimum radius of 25 feet from the discovery pending review by the Director.
- Unanticipated discoveries shall be evaluated for significance by a qualified paleontologist. If evaluation determines that significance criteria are met, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report, including catalog with museum numbers.

Greenhouse Gas Emissions

- 5-1** Within approximately 18 months of adoption of the proposed General Plan Update, the City of Pasadena shall prepare and present to the City Council for adoption a community climate action plan/greenhouse gas reduction plan. The Plan shall identify strategies to be implemented to reduce GHG emissions associated with the City and shall include as one alternative a program that achieves the AB 32 targets. In addition, the City shall monitor GHG emissions by updating its community-wide GHG emissions inventory every five years upon adoption of the initial Plan. Upon the next update to the community climate action plan/greenhouse gas reduction plan, the inventory, GHG reduction measures, and GHG reductions shall be forecast to year 2035 to ensure progress toward achieving the interim target that aligns with the long-term GHG reduction goals of Executive Order S-03-04. The Plan update shall take into account the reductions achievable from federal and state actions and measures as well as ongoing work by the City and the private sector. The 2035 Plan update shall be completed by January 1, 2021, with a plan to achieve GHG reductions for 2035 or 2040, provided the state has an actual plan to achieve reductions for 2035 or 2040. New reduction programs in similar sectors as the proposed Plan (building energy, transportation, waste, water, wastewater, agriculture, and others) will likely be necessary. Future targets shall be considered in alignment with state reduction targets, to the maximum extent feasible, but it is premature at this time to determine whether or not such targets can be feasibly met through the combination of federal, state, and local action given technical, logistical and financial constraints. Future updates to the community climate action plan/greenhouse gas reduction plan shall account for the horizon beyond 2035 as the state adopts actual plans to meet post-2035 targets. In all instances, the community climate action plan/greenhouse gas reduction plan and any updates shall be consistent with state and federal law.

Noise

- 9-1** Prior to issuance of building and occupancy permits, applicants of industrial projects that involve vibration-intensive machinery or activities adjacent to sensitive receptors shall prepare a study to evaluate potential vibration impacts. The study shall be prepared by an acoustical engineer and be submitted to the City of Pasadena Planning Division. The study shall evaluate the vibration levels associated with operation of project-related equipment and activities experienced by nearby sensitive receptors. If it is determined that vibration impacts to nearby receptors exceed the Federal Transit Administration (FTA) vibration-annoyance criterion, the study shall recommend and the applicant shall implement the identified measures with the purpose of reducing vibration impacts to a less than significant level. The City of Pasadena shall verify implementation of all identified measures.
- 9-2** Prior to issuance of building permits for the new construction of habitable area, applicants for development projects shall adhere to the appropriate Vibration Category 2 and Vibration Category 3 screening distances for light rail transit as recommended in Table 9-2 of FTA's Transit Noise and Vibration Impact Assessment (FTA 2006) in evaluating vibration impacts related to trains on the Metro A Line. Applicants for development projects that fall within the screening distances shall prepare and submit to the City of Pasadena Planning Division a study evaluating vibration impacts to the proposed development from train operations. The study shall be prepared by an acoustical engineer who shall identify measures to reduce impacts to habitable structures to below the FTA vibration annoyance criterion. The identified measures shall be incorporated into all design plans submitted to the City of Pasadena.
- 9-3** Prior to issuance of any grading and construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., residences and historic structures) shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The study shall be prepared by an acoustical engineer and shall identify measures to reduce impacts to habitable structures to below the FTA vibration annoyance criterion. If construction-related vibration is determined to be perceptible at vibration-sensitive uses, additional requirements, such as use of less-vibration-intensive equipment or construction technique, shall be implemented during construction (e.g., drilled piles, static rollers, and nonexplosive rock blasting). Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.
- 9-4** Prior to issuance of any construction permits, applicants for individual projects that involve vibration-intensive construction activities, such as pile drivers, jack hammers, bulldozers, and vibratory rollers, within 25 feet of sensitive receptors (e.g., residences) or 50 feet of historic structures, shall prepare and submit to the City of Pasadena Planning Division a study to evaluate potential construction-related vibration impacts. The vibration assessment shall be prepared by an acoustical engineer and be based on the FTA vibration-induced architectural damage criterion. If the study determines a potential exceedance of the FTA thresholds, measures shall be identified that ensure vibration levels are reduced to below the thresholds. Measures to reduce vibration levels can include use of less-vibration-intensive equipment (e.g., drilled piles and static rollers) and/or construction techniques (e.g., nonexplosive rock blasting and use

of hand tools) and preparation of a preconstruction survey report to assess the condition of the affected sensitive structure. Notwithstanding the above, pile drivers shall not be allowed within 150 feet of any historic structures. Identified measures shall be included on all construction and building documents and submitted for verification to the City of Pasadena Planning Division.

9-5 Prior to issuance of construction permits, applicants for new development projects within 500 feet of noise-sensitive receptors shall implement the following best management practices to reduce construction noise levels:

- Consider the installation of temporary sound barriers for construction activities immediately adjacent to occupied noise-sensitive structures.
- Equip construction equipment with mufflers.
- Restrict haul routes and construction-related traffic.
- Reduce nonessential idling of construction equipment to no more than five minutes.

The identified best management practices shall be noted on all site plans and/or construction management plans and submitted for verification to the City of Pasadena Planning Division.

Transportation and Traffic

13-1 The City of Pasadena shall update its existing transportation impact fee program by 2020. The City shall prepare a “Nexus” Study that will serve as the basis for requiring development impact fees under AB 1600 legislation, as codified by California Code Government Section 66000 et seq. The established procedures under AB 1600 require that a “reasonable relationship” or nexus exist between the traffic improvements and facilities required to mitigate the traffic impacts of new development pursuant to the proposed project. After approval of the Nexus Study, the City shall update the transportation impact fee program to fund all citywide circulation improvements, including the pedestrian and bicycle network. The fee program shall stipulate that fees are assessed when there is new construction or when there is an increase in square footage within an existing building or the conversion of existing square footage to a more intensive use. Fees are calculated by multiplying the proposed square footage or dwelling unit by the rate identified. The fees are included with any other applicable fees payable at the time the building permit is issued. The City will use the development fees to fund construction (or to recoup fees advanced to fund construction).

CHAPTER 5 LIST OF PREPARERS

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