

PASADENA UNIFIED SCHOOL DISTRICT
740 WEST WOODBURY
PASADENA, CA 91103

INITIAL STUDY
May 25, 2010

This Initial Study Mitigated Negative Declaration (IS MND) was prepared for the Pasadena Unified School District (PUSD), and is intended to assess the potential environmental impacts associated with the construction and long-term operation of the proposed Pasadena Unified School District Central Kitchen and Advanced Culinary Arts and Hospitality Academy (Project). This IS MND has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code, Section 21000 et seq.), the Guidelines for Implementation of the California Environmental Quality Act published by the Resources Agency of the State of California (California Administrative Regulations Section 15000 et seq.). This IS MND is an informational document to be used by decision-makers, public agencies, and the general public. This IS was prepared by Michael Brandman Associates (MBA), a private environmental consulting firm on behalf of the PUSD, which is the Lead Agency. As mandated by the CEQA Guidelines, this IS MND reflects the independent judgment of the PUSD regarding the Project (CEQA Guidelines Section 15084(e)). Following a 30-day period for circulation and public review, the PUSD will consider all comments prior to any decision on the Project.

SECTION I – PROJECT INFORMATION

1. Project Title: Pasadena Unified School District Central Kitchen and Advanced Culinary Arts and Hospitality Academy
2. Lead Agency Name and Address: Pasadena Unified School District, 740 West Woodbury, Pasadena, CA 91103
3. Contact Person and Phone Number: Stephen L. Brinkman
Chief, Facilities
740 West Woodbury
Pasadena Unified School District
Pasadena, CA 91103
Phone: 626-396-3604
Fax: 626-798-1024
4. Project Location: 740 West Woodbury Road, Pasadena, CA 91103
5. Project Sponsor's Name and Address: Pasadena Unified School District (District Office), 351 South Hudson Avenue, Pasadena, CA 91109
6. General Plan Designation: Industrial
7. Zoning: Industry, General (IG)
8. **Description of the Project:** The PUSD proposes to adaptively re-use the existing building that is located at the PUSD's District Service Center (an existing warehouse facility), currently located at 740 West Woodbury Road in the City of Pasadena, California. See Exhibits 1, 2 and 3 for a regional, local and topographic map of the Project area. The proposed Project consists of the

renovation of an existing 52,500 square-foot building and to develop a Central Kitchen and Advanced Culinary Arts and Hospitality Academy (Project).

Currently, the existing 52,500 square-foot building on the Project site provides space for PUSD land use components, which include warehousing function, food service administration, curriculum/learning material storage (curriculum resource center), and archives record retention. In addition, the PUSD Professional Development Center formerly operated within the existing building on the Project site but was recently relocated (late year 2009). The Professional Development Center provides training and development for approximately 40 to 50 persons per session. Additionally, approximately twelve (12) Pasadena Area Rapid Transit Service (ARTS) vehicles are currently stored on the surface parking area located along the west side of the Project site building.

Vehicular access to the Project site (i.e., PUSD District Service Center property) is provided via two driveways on the Woodbury Road property frontage. Also, the surface parking area where the ARTS vehicles are stored is accessed via a single driveway on the Cañada Avenue property frontage.

Implementation of the Project will modify PUSD's existing PUSD District Service Center facility to include the following:

Central Kitchen Facilities: Approximately 22,800 square feet of building area will be allocated for Central Kitchen operations. Construction of the new Central Kitchen is planned to modernize facilities, standardize menus, better control food safety, better supervise the food preparation process, reduce overall costs per meal, and accommodate a culinary arts education program for PUSD students. Additionally, it should be noted that the proposed project will centralize many PUSD food service operations that currently occur at individual schools.

Warehouse Facilities: Approximately 14,200 square feet of building area will be allocated for warehousing PUSD materials and records (e.g., archives record retention). Warehousing of PUSD materials/supplies, which currently occurs at the existing building, will therefore continue as part of the proposed Project.

Curriculum/Learning Material Storage: Approximately 9,500 square feet of building area will be allocated for learning materials operations and storage. Learning materials operation and storage, which currently occur at the existing building, will continue as part of the proposed Project.

Teaching Kitchen/Hospitality Academy: The teaching kitchen/hospitality Academy will include a classroom, teaching kitchen and café which will encamp approximately 3,000 square feet of building area. The classroom, teaching kitchen and café is planned to be an educational land use component and essentially function as a cafeteria for the adjacent PUSD District Service Center as well as for nearby local commercial entities. This land use component will be focused on the breakfast and lunch service periods typically associated with cafeterias for the adjacent uses and some patronage is expected from motorists currently passing by the site on Woodbury Road. Also, it should be noted that catering operations will not be conducted as part of the classroom, teaching kitchen and café and this land use component will not be open for dinner.

In addition to the above land use components planned for the adaptive re-use of the existing building, PUSD is planning the installation of an outdoor teaching/event area located at the northwest corner of the Project site, adjacent to the building. Students will be able to learn cooking skills and functions at these outdoor facilities. The outdoor teaching/event area is planned to be utilized for occasional special events (e.g., PUSD functions) that will typically be held during morning or evening periods. Construction of the proposed Project is expected to commence in year 2010 with occupancy in the year 2011. The site plan for the proposed Project is illustrated in Exhibit 4.

Exhibit 1: Regional Location Map

Exhibit 2: Local Vicinity Map Topographic Base

Exhibit 3: Local Vicinity Map Aerial Base

Exhibit 4: Site Map

A total of 79 on-site parking spaces, including four handicap accessible spaces, will be provided in surface parking facilities located on the periphery of the building. Currently, approximately 51 spaces exist at the site, which totals an incremental increase of 28 parking spaces at the Project site. Vehicular access to the proposed Project (i.e., PUSD District Service Center property) will be provided via the two existing driveways along the Woodbury Road property frontage and a new, relocated driveway along the Cañada Avenue property frontage.

Pedestrian access to the Project site is planned to be significantly enhanced with sidewalk and landscaping improvements along the Woodbury Road and Cañada Avenue property frontages. The District will install a new sidewalk along the entire Woodbury Road property frontage (i.e., from Cañada Avenue to Casitas Avenue). Landscaping improvements also will be installed along both the Cañada Avenue and Woodbury Road property frontages to enhance and encourage pedestrian activity near the Project site.

Additionally, the Pasadena ARTS vehicles are currently stored on the surface parking area located along the west side of the project site building. However, the ARTS vehicles will be relocated from the site as part of the proposed Project. The existing building and surface parking lots on the Project site will be reconfigured to accommodate the proposed Project.

The proposed modifications and associated square footage is described in Table 1, below.

Table 1: Proposed Building and Associated Square Footage

Category/Function	Square Feet
Central Kitchen	22,800
Teaching Kitchen, Classroom, Café	3,000
Learning Material Storage	9,500
Warehouse	14,200
Outdoor Teaching/Event Area	3,000
Total	52,500
Source: Traffic Impact Study, April 2010.	

- 9. Surrounding Land Uses and Setting:** The proposed PUSD Central Kitchen/ Advanced Culinary Arts and Hospitality Academy site is located near the west margin of a triangular shaped, low relief, alluvial plain known as the Raymond Basin. The Raymond Basin is bordered by the Arroyo Seco and San Rafael Hills (west), Sierra Madre Fault and San Gabriel Mountains (north), and the Raymond Fault and San Gabriel Basin (south).

The Project site is located directly east of Cañada Avenue and directly south of West Woodbury Road. The Project site is located directly east of Cañada Avenue and directly south of West Woodbury Road, in the northwest area of Pasadena (Specifically located at 740 West Woodbury Road). The Project site is part of the PUSD District Service Center complex and is bounded by Woodbury Road to the north, PUSD recreation playing fields to the south, other portions of the Service Center to the east, and Cañada Avenue to the west. The general topography at the Project site is comprised of relatively flat-graded areas, draining to the southeast. The ground surface elevations range from 1,081 feet at the southeastern portion of the site to 1,088 feet at the northwestern portion of the site.

Land uses located to the north, east and west of the Project site are located within the unincorporated community of Altadena, Los Angeles County. The Altadena zoning map (2008) designates the properties to the north, east and west as Commercial Manufacturing (C-M). In addition, areas located to the south of the Project site are within the City of Pasadena. The City of Pasadena zoning map (2008) designates the land uses to the south as Public and Semi-Public (PS).

Except for District-owned athletic field south of the project site, the existing land uses surrounding the Project site the surrounding land use are commercial or industrial in nature.

The PUSD athletic facilities to the south and southeast include a baseball diamond, football, soccer and track fields, which are located approximately 80 feet south of the Project site. These fields are associated with John Muir High School 0.48 mile southeast. In addition, the Project site is located approximately 1,000 feet northwest of State Route 210 (SR 210) Freeway.

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement):

The IS is intended as an informational document to be used by decision-makers, public agencies, public service providers and the public to assist in the assessment of the Project. Pursuant to CEQA, an Initial Study of the Project shall be circulated for public review prior to approval by PUSD, so that the public may have the opportunity to comment. The PUSD, as the Lead Agency, must review the Project prior to approval. All responsible agencies, including the South Coast Air Quality Management District (SCAQMD), the City of Pasadena, and others must have the opportunity to review the Project prior to approval. The review process is designed to identify and eliminate, minimize or mitigate any potentially negative physical impacts of the Project on the environment to levels that are deemed to be less than significant.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION:

On the basis of this initial evaluation:

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

Prepared By/Date

Reviewed By/Date

Printed Name

Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: _____

Adoption attested to by: _____
Printed name/Signature
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, “Earlier Analysis,” may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 21 at the end of the checklist.
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures, which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant

SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Currently, the existing 52,500 square-foot building on the Project site provides space for PUSD land use components, which include central kitchen facilities, food service operations, curriculum/learning material storage (curriculum resource center), and archives record retention. Implementation of the Project will adaptively re-use the existing 52,500 square-foot building that is located at the PUSD's District Service Center (an existing warehouse facility), and will develop a Central Kitchen and Advanced Culinary Arts and Hospitality Academy (See Section I for further information in this regard).

2. ENVIRONMENTAL IMPACTS.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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3. AESTHETICS. Would the project:

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

WHY? The City of Pasadena General Plan (2008) does not designate the Project area as being within a scenic vista. In addition, the Arroyo Seco and San Rafael Hills are located approximately 0.35-0.50 miles west of the Project site. However, views of the Arroyo Seco and the San Rafael Hills from residences to the east of the site are already impaired by the existing PUSD Maintenance and Operations warehouse and buildings. In addition, the Project will not change the existing building mass or height. The existing Project building is similar in size and stature to the surrounding structures zoned for industrial uses. Therefore, impacts to scenic vistas upon implementation of the Project will be less than significant.

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

WHY? The Project site is not located within the viewshed of a State Scenic Highway or roadway corridor, as outlined in the City of Pasadena General Plan (2008). The only designated State Scenic Highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which is located approximately 3.2 miles north of the Project site. Consequently, due to the site's distance to State Highway 2, impacts will be less than significant. In addition, the site does not have structures that have been designated as historic resources nor would the Project impact nearby sites or structures, which are historic resources. Therefore, implementation of the Project will have a less than significant impact to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings.

c. *Substantially degrade the existing visual character or quality of the site and its surroundings?*

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No Impact

WHY? The Project will create short-term impacts due to specific phases in the construction process. Typical short-term impacts are in the form of isolated views of the site with construction equipment and machinery. Because this impact would be short-term and temporary, it is considered less than significant.

In addition, the existing buildings height and mass will not be modified by development of the Project site; consequently, the character of the view from the Project site and into the Project site will not be significantly altered. Development of the Project will actually improve the façade of the building with architectural treatments and new paint, consequently enhancing the aesthetic appearance of the existing structure.

Moreover, pedestrian access to the Project site is planned to be significantly enhanced with sidewalk and landscaping improvements along the Woodbury Road and Cañada Avenue property frontages. The District will install a new sidewalk along the entire Woodbury Road property frontage (i.e., from Cañada Avenue to Casitas Avenue). Landscaping improvements also will be installed along both the Cañada Avenue and Woodbury Road property frontages to enhance and encourage pedestrian activity near the Project site. Improvements to the existing structure and landscaping will be subject to compliance with the California Department of Education Code. Impacts to the existing visual character or quality of the site and its surroundings will be less than significant.

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

WHY? Implementation of the proposed Project will be consistent with existing lighting conditions by including two types of lighting that may be visible during nighttime and early morning hours, including facility lighting on buildings and lighted parking areas. However, as a standard practice, the District will have prepared a lighting plan to prevent potential light spillover and glare on adjacent properties. Implementation of the lighting plan will ensure that development of the Project will not cause a substantial sources light spillover or glare on adjacent properties. Therefore, impacts from light or glare will be less than significant.

4. AGRICULTURAL RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project.

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

WHY? According to the Farmland Mapping and Monitoring Program (FMMP) Map of the California Resources Agency, the proposed Project site does not contain prime farmland, unique farmland, or farmland of statewide importance. Therefore, implementation of the Project will not have a significant impact in regards to converting prime farmland, unique farmland, or farmland of statewide importance to a non-agricultural use.

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

WHY? The Project is currently in use as a school warehouse facility and is not within or near to any zoning for agricultural use, and is not under a Williamson Act contract. Thus, there would be no impact resulting from Project development.

c. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

WHY? As previously stated, the Project is currently in use as a school warehouse facility and is not within or near to any zoning for agricultural use. Therefore, the proposed Project would not result in the conversion of farmland to a non-agricultural use.

5. AIR QUALITY.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

WHY? The City of Pasadena is within the South Coast Air Basin (SoCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).

The SoCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source pollutants; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The most recently adopted plan is the 2007 AQMP, adopted on June 1, 2007. This plan is the South Coast Air Basin's portion of the State Implementation Plan (SIP). This plan is designed to achieve the five percent annual reduction goal of the California Clean Air Act.

The SCAQMD understands that southern California is growing. As such, the AQMP accommodates population growth and transportation projections based on the predictions made by the Southern California Association of Governments (SCAG). Thus, projects that are consistent with employment and population forecasts are consistent with the AQMP.

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In addition to the region-wide AQMP, the City of Pasadena participates in a sub-regional air quality plan – the West San Gabriel Valley Air Quality Plan. This plan, prepared in 1992, is intended to be a guide for the 16 participating cities, and identifies methods of improving air quality while accommodating expected growth.

Due to the proposed Project’s re-use of the PUSD’s existing District Service Center, the proposed intensity of the proposed Project is within the intensity allowed by the Zoning Code and envisioned in the City’s approved General Plan. Since the AQMP is in large part dependent on the growth assumptions contained in local general plans, a project that is consistent with the local general plan is consistent with the AQMP. Therefore, since the proposed Project is consistent with the Zoning and General Plan Land Use designations for the site, the proposed Project is therefore consistent with the AQMP and the West San Gabriel Valley Air Quality Plan, and would have no associated impacts. Impacts in this regard would be less than significant.

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

WHY? Due to its geographical location and the prevailing on shore daytime winds, Pasadena receives smog from downtown Los Angeles and other areas in the Los Angeles basin. The prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities, to the San Fernando Valley and to Pasadena in the San Gabriel Valley where it is trapped against the foothills. For these reasons the potential for adverse air quality in Pasadena is high.

The following includes, but is not limited to, the rules that are applicable to this project:

- SCAQMD Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- SCAQMD Rule 403 requires fugitive dust activities to follow best available control measures (BACM) to reduce emissions of fugitive dust. The Rule 403 BACM measures are provided in Table 1 (applicable to all construction activities) of Rule 403. The applicable Rule 403 measures include:
 - > Application of non-toxic soil stabilizers according to manufacturer’s specifications to all inactive construction areas (previously graded inactive for 10 days or more);
 - > Watering of active earth moving areas (pad areas and haul roads) at least three times daily (locations where earth moving is to occur will be thoroughly watered prior to earth moving
 - > All trucks hauling dirt, sand, soil, or loose materials are to be covered, or should maintain at least 2-foot of freeboard;
 - > Revegetate disturbed areas as soon as possible
 - > Reduce traffic speeds on all unpaved roads to 15 miles per hour or less
 - > Stop all grading and excavation activities when the wind speed exceeds 25 miles per hour.
- SCAQMD Rule 481 applies to all spray painting and coating operations and equipment such that a person shall not operate any spray painting or coating equipment unless the equipment is inside a control enclosure, coatings are applied with High volume-low pressure (HVLP), electrostatic and/or airless spray

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equipment, or an alternative method having the effectiveness equal to or greater than a control booth or HVLP, electrostatic and/or airless spray equipment.

- SCAQMD Rule 1108 governs the sale, use and manufacturing of asphalt and limits the volatile organic compound (VOC) content in asphalt used in the SoCAB. This rule regulates the VOC content of asphalt available for use during the construction.
- SCAQMD Rule 1113 governs the sale, use and manufacturing of architectural coatings and limits the VOC content in paints and paint solvents. This rule regulates the VOC content of paints available for the use during the construction and operational maintenance of buildings.
- SCAQMD Rule 1138 applies to owners and operators of commercial cooking operations preparing food for human consumption that use chain-driven charbroilers used to cook meat.
- SCAQMD Rule 1157 limits the emissions of PM₁₀ due to aggregate and related operations
- SCAQMD Rule 1186 limits the presence of fugitive dust on paved and unpaved roads and sets certification protocols and requirements for street sweepers which under contract to provide sweeping services to any federal, state, county, agency or special district such as water, air, sanitation, transit or school district.
- SCAQMD Rule 1303 governs the permitting of re-located or new major emission sources, requiring BACM and setting significance limits for PM₁₀ among other pollutants.
- California Air Resources Board (CARB) Air Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling limits the idling of diesel vehicles to reduce emissions of toxics and criteria pollutants. The driver of any vehicle subject to this section: (1) shall not idle the vehicle's primary diesel engine for greater than five minutes at any location; and (2) shall not idle a diesel-fueled auxiliary power system (APS) for more than five minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle if it has a sleeper berth and the truck is located within 100 feet of a restricted area (homes and schools). This measure applies to construction delivery trucks and food and other perishable trucks during the operation of the proposed Project.
- CARB Air Toxics Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRUs) and TRU Generator Sets, and Facilities Where TRU's Operate implements the provisions of the CARB Diesel Risk Reduction Program that limits the emissions of diesel particulate matter emissions from TRUs that operate in California. This measure applies to food and other perishable delivery trucks operating a TRU during the operation of the proposed Project.
- CARB Final Regulation Order, Requirements to Reduce Idling Emissions from New and In-Use Trucks, beginning in 2008, would require that new 2008 and subsequent model-year heavy-duty diesel engines be equipped with an engine shutdown system that automatically shuts down the engine after 300 seconds of continuous idling operation once the vehicle is stopped, the transmission is set to "neutral" or "park", and the parking brake is engaged. This measure applies to construction delivery trucks and food and other perishable trucks during the operation of the proposed Project.

Pasadena is located in a non-attainment area, an area that frequently exceeds national ambient air quality standards. The SCAQMD has defined two principal thresholds that it recommends lead agencies use in assessing the air quality significance of development projects appropriate for a CEQA evaluation. These thresholds are the regional significance thresholds and the localized significance thresholds. The regional thresholds are designed to protect the air resources within the SoCAB as a whole, as project emissions can potentially cumulatively contribute to the existing emission burden and possibly affect the attainment and maintenance of ambient air quality standards. Projects within the SoCAB with regional construction or operational emissions in excess of any of the thresholds are considered to have a significant regional air quality impact. These thresholds set daily limits for construction and operational emissions.

Localized significance thresholds or LSTs were developed in recognition of the fact that criteria pollutants such as carbon monoxide (CO), oxides of nitrogen (NO_x), and particulate matter (PM₁₀ and PM_{2.5}) can have

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Less Than Significant Impact

No Impact

local impacts at nearby sensitive receptors as well as regional impacts. The LSTs are developed by location within the SCAQMD, depend on the size of the project, and are applicable to NO_x, CO, PM₁₀, and PM_{2.5}. Separate daily LSTs have been defined for construction and operations. The proposed Project is located in SCAQMD source receptor area 8 (West San Gabriel Valley). The closest residences are located approximately 330 feet to the northeast of the project on the northern side of West Woodbury Road. A listing of the SCAQMD's regional and localized significance thresholds are provided in Table 2. Note that the difference between a regional impact versus a localized impact is that the regional impact considers emissions generated by a project from both onsite and offsite emission sources while a localized impact only considers emissions generated from onsite emission sources. Examples of offsite emissions would include worker and delivery vehicle emissions as these vehicles come to and leave the project site while onsite emission sources include construction equipment, fugitive dust, painting, landscaping, and natural gas usage for heating.

Table 2: SCAQMD Regional and Localized Significance Thresholds

SCAQMD Daily Regional Thresholds		
Pollutant	Construction (pounds per day)	Operation (pounds per day)
VOC	75	55
NO _x	100	55
PM ₁₀	150	150
PM _{2.5}	55	55
SO _x	150	150
CO	550	550

SCAQMD Daily Localized Thresholds(1)	
Pollutant	Construction (pounds per day)
NO _x	69
PM ₁₀	11
PM _{2.5}	4
CO	535

Note:
(1) LST defined for SCAQMD Source Receptor area number 8, 1 acre project area and a receptor distance of 50 meters.
Source: SCAQMD 2010

The proposed Project would generate short-term air pollutants from construction activities and long-term air pollutants from typical vehicle trips and operation of the renovated facility. The short-term construction emissions are expected to be minimal due to the fact that the construction activities would principally involve the internal tenant improvements of the existing structure. The outside construction activities would involve repaving of existing asphalt areas, sidewalk improvements, the exterior painting of the building structure and the construction of the outdoor teaching/event area.

The proposed Project's air emissions were calculated using the "URBEMIS 2007 Air Emissions from Land Development" model (URBEMIS model) and emission estimates derived from the SCAQMD using the following assumptions:

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- The Project consists of approximately 52,000 square feet of building space which is the same size as the existing warehouse.
- The proposed Project would generate a net increase of 302 trips per day over existing levels
- Construction was assumed to start in September 2010 and be completed in August 2011.
- No demolition of the existing building facilities is assumed to take place
- A total of approximately 48,400 square feet of existing asphalt would be removed, recycled, and replaced; 730 sq-ft of existing concrete driveways would be removed, hauled offsite and replaced; 17,260 square feet of concrete would be added for sidewalks, driveways and other onsite surface coverage
- Renovation of the proposed structure would take 12 months, which includes one month to apply architectural coatings. Construction is expected to involve the following equipment:
 - Forklifts and tractor/loader/backhoe
 - Grader
 - Water truck
 - Paver
 - Concrete saw
 - Excavator
 - Roller
 - Other paving equipment
 - Rubber tired loader
 - Crushing/processing equipment

Table 3 provides a summary of the maximum daily short-term regional construction emissions from the proposed Project along with the applicable SCAQMD regional emission thresholds. As noted from Table 3, the short-term construction emissions would not exceed the SCAQMD's regional significance thresholds. The PM₁₀ and PM_{2.5} emissions assume compliance with SCAQMD Rule 403 regarding fugitive dust and would involve the application of watering twice per day of disturbed areas and the application of controls to reduce dust emissions during unloading/loading activities as appropriate to the demolition and grading construction activities.

Table 4 presents the estimated regional area and mobile operational emissions from the existing emission sources, emissions from the proposed Project, and the net change in emissions as calculated by the URBEMIS model along with the relevant SCAQMD regional emission significance thresholds.

Table 3: Maximum Daily Regional Construction Emissions – Proposed Project

Construction Activity	Max Daily Regional Emissions (pounds per day)					
	VOC	NO _x	CO	PM ₁₀	PM _{2.5}	SO _x
Demolition of Existing Surfaces	5.8	41.6	20.9	3.8	2.5	0.0
Grading of Active Surfaces	2.8	21.7	10.3	5.7	2.0	0.0

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Table 3: Maximum Daily Regional Construction Emissions – Proposed Project

Construction Activity	Max Daily Regional Emissions (pounds per day)					
	VOC	NO _x	CO	PM ₁₀	PM _{2.5}	SO _x
Paving of Active Surfaces	6.4	50.8	17.8	21.5	6.5	0.1
Building Construction	0.9	5.7	6.6	0.5	0.4	0.0
Architectural Coating	39.1	0.0	0.4	0.0	0.0	0.0
Maximum Daily Emissions	39.1	50.8	20.9	21.5	6.5	0.1
SCAQMD Regional Threshold	75	100	550	150	55	150
Exceeds Threshold?	No	No	No	No	No	No

Source: see Appendix A for the URBEMIS model output

Table 4: Maximum Daily Regional Operational Emissions

Activity	Max Daily Regional Emissions (pounds per day)					
	VOC	NO _x	CO	PM ₁₀	PM _{2.5}	SO _x
Existing Sources	1.6	1.8	12.6	2.0	0.4	0.0
Proposed Project	3.7	5.2	42.6	6.7	1.3	0.0
Net Change	+1.7	+3.4	+30.0	+4.7	+0.9	0.0
SCAQMD Regional Threshold	55	55	550	150	55	150
Net Change Exceeds Threshold?	No	No	No	No	No	No

Source: see Appendix A for the URBEMIS model output

Table 4 indicates that the increase in operational emissions from the proposed Project compared to the level of emissions from the existing use would not exceed the SCAQMD's regional operational significance thresholds.

In terms of potential localized significance impacts, Table 5 provides the results of the localized impact analysis for construction. Provided therein are the estimated project construction emissions compared to the SCAQMD's construction LSTs.

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Table 5: Maximum Daily Localized Construction Emissions – Proposed Project

Construction Activity	Max Daily Localized Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Demolition of Existing Surfaces	40.0	19.2	2.7	2.3
Grading of Active Surfaces	21.6	9.7	5.7	2.0
Paving of Active Surfaces	21.3	11.5	1.5	1.4
Building Construction	5.1	3.4	0.4	0.4
Architectural Coating	0.0	0.0	0.0	0.0
Maximum Daily Emissions	40.0	19.2	5.7	2.3
SCAQMD Localized Threshold ⁽¹⁾	69	535	11	4
Exceeds Threshold?	No	No	No	No

Note:
⁽¹⁾ LST defined for SCAQMD Source Receptor area number 8, 1 acre project area and a receptor distance of 50 meters.
Source: see Appendix A for the URBEMIS model output.

As noted from Table 5, the maximum daily localized construction emissions would not exceed the SCAQMD’s daily localized significance thresholds.

With regard to the proposed Project’s localized operational emissions, the principal source of localized emissions are from the onsite area sources such as heaters and ovens that consume natural gas, landscape equipment, and periodic maintenance painting. Virtually all of the mobile source emissions, which comprise the largest source of regional emissions are generated offsite and away from the proposed Project as motor vehicles travel on local streets to and from the project. As a result, the project’s localized emissions are expected to be less than significant.

From the results provided on the above tables (Tables 3, 4 and 5), the construction and operation of the Project are less than the applicable SCAQMD significance thresholds and, therefore, would not result in the violation of any air quality standard or contribute to an existing or projected air quality violation.

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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

WHY? The City of Pasadena is within the SoCAB, which is an airshed that regularly exceeds ambient air quality standards (AAQS) – i.e., a non-attainment area. The SoCAB is designated a non-attainment area for respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and ozone (O₃). The SoCAB is

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currently designated an attainment area for the remaining criteria pollutants, which include CO, NO_x, and sulfur dioxide (SO₂).

As shown in Section 5.b, the proposed project would not exceed the SCAQMD's regional thresholds for Significance. The SCAQMD established these thresholds in consideration of cumulative air pollution in the SoCAB. Thus, projects that do not exceed the SCAQMD's regional thresholds do not significantly contribute to cumulative air quality impacts. Since the proposed Project would not exceed the SCAQMD's thresholds, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant, and the Proposed Project would have no related significant impacts.

d. Expose sensitive receptors to substantial pollutant concentrations?

WHY? As shown in Section 5.b, the proposed Project would not exceed the SCAQMD's Localized Thresholds for Significance. The SCAQMD established these thresholds in consideration of the potential for project emissions to impact local sensitive receptors. Thus, projects that do not exceed the SCAQMD's localized thresholds do not significantly contribute to local air quality impacts. Since the proposed Project would not exceed the SCAQMD localized thresholds, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations.

Two other considerations are also relevant to the discussion of exposures to substantial pollutant concentrations. One involves the emissions of diesel particulate matter from the use of diesel delivery trucks and the other consideration involves the potential for project-related traffic to cause a carbon monoxide "hotspot" at a heavily congested traffic intersection. Each of these considerations is discussed further.

Diesel emissions have been identified by the California Air Resources Board as a carcinogenic toxic air contaminant. The principal source of diesel emissions from the proposed Project is associated with the semi-truck diesel delivery vehicles that would bring supplies to the facility on a daily basis. According to the Project's traffic impact analysis (Linscott, Law and Greenspan, 2010), the project would increase the number of diesel trucks accessing the project site by approximately 2 trucks per day compared to the current operations. This increase, however, is not expected to result in a significant exposure to diesel particulate matter because of the relatively small number of trucks involved and the limits on truck idling as imposed by the ARB's Air Toxic Control Measure that limits the truck idling to 5 minutes. In addition, the ARB has recommended that land uses with sensitive receptors avoid being sited within 500 feet of a freeway (ARB 2005). The nearest freeway to the proposed Project is Interstate 210 located to the southwest approximately 600 feet at its closest point to the proposed Project. Because of this separation distance, the proposed Project is not expected to be significantly impacted by the traffic emissions generated on this freeway.

With regard to the potential for project-related traffic to cause a carbon monoxide hot spot, a hot spot could potentially form under the right set of conditions involving a heavily congested traffic intersection accompanied by very stagnant meteorological conditions. To examine this consideration, an analysis was done to quantify the carbon monoxide levels at the intersection exhibiting the highest volume of traffic as quantified in the traffic impact study. This intersection was identified as the Lincoln Avenue/Woodbury Road intersection. The CALINE4 air dispersion traffic intersection model was used to estimate carbon monoxide air quality levels at the above intersection considering the cumulative traffic levels from existing traffic, growth in ambient traffic, traffic from the development of related projects, and from the traffic generated by

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the proposed Project itself. Table 6 summarizes the cumulative carbon monoxide concentrations at the Lincoln Avenue and Woodbury Road intersection. As noted from this table, the cumulative carbon monoxide concentrations are less than the federal and State carbon monoxide standards indicating that the proposed Project would not create a carbon monoxide hot spot and, therefore, not expose sensitive receptors to substantial pollutant concentrations.

Table 6: Carbon Monoxide Hot Spot Analysis

Intersection	Max 1-hour ⁽¹⁾ CO Concentration	1-hr CO Air Quality Standard	Exceeds Standard?	Max 8-hour ⁽²⁾ CO Concentration	8-hr CO Air Quality Standard	Exceeds Standard?
Lincoln Ave @ Woodbury Rd	7.7 ppm	20.0 ppm	No	5.6 ppm	9.0 ppm	No

Notes:

⁽¹⁾ Includes a background CO of 6.5 ppm for Source Receptor Area 8 in 2011 and CO from existing traffic, growth in ambient traffic, traffic from related projects, and from the project itself.

⁽²⁾ The 8-hour CO concentration due to the emissions of CO from the traffic is derived by multiplying the 1-hour concentration by a persistency factor of 0.7; includes a background CO of 4.8 ppm for Source Receptor Area 8 in 2011.

Source: see Appendix A for the CALINE4 model output.

e. Create objectionable odors affecting a substantial number of people?

WHY? The main source of potential odors derive from the food preparation and cooking at the kitchen and culinary facilities and may be occasionally perceptible. However, such odors would be consistent with the odors generated due to the existing cooking operations and would be confined to the immediate vicinity of the project. Restaurants are also typically required to have ventilation systems that avoid substantial adverse odor impacts and visible emissions.

The other source of potential odors would be from trash receptacles for storage of food waste. Odors from trash bins would be extremely localized (10 to 20 feet from the source) and could generate occasional odors pending regular collection and ultimate disposal into a sanitary landfill. However, project - generated refuse would be disposed into appropriate trash collection containers, which would be covered and enclosed as required by the City of Pasadena. Trash receptacles within the project area would be required to have lids that enable convenient collection and loading and would be emptied on a regular basis, in compliance with City of Pasadena regulations for the collection of solid waste. As a result, impacts from odors would remain less than significant.

6. **BIOLOGICAL RESOURCES.** Would the project:

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

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WHY? The Project site and area consists of urban development; therefore the potential of sensitive species existing onsite is considered low. In addition, the Project site does not support any vegetation or resource that serves as a habitat for sensitive or special status species nor migratory fish or wildlife. Therefore, impacts in this regard will be less than significant.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFG or USFWS?

WHY? The Project site is in an urbanized area and is isolated from natural wildlife areas by the surrounding urban environment. In addition, during site reconnaissance, no riparian habitat or other sensitive natural communities were found at the site. For these reasons, impact associated with this issue is considered less than significant.

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

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

The Project site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands. Therefore, the proposed Project would have a less than significant impact to federally protected wetlands as defined by Section 404 of the Clean Water Act.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

WHY? The Project site is in an urbanized area and is isolated from natural wildlife areas and corridors by the surrounding urban environment. The Project site does not contain any migratory routes or corridors of any kind. For these reasons, impact associated with this issue will be less than significant.

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

WHY? The only local ordinance protecting biological resources in the City of Pasadena is Ordinance No. 6896 “City Trees and Tree Protection Ordinance”. The site contains no trees protected by this ordinance or

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trees designated as landmarks. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, and would have a less than significant impact to local policies or ordinances protecting biological resources.

f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?

WHY? Currently, there are no adopted HCP or NCCPs within the City of Pasadena. There are also no approved local, regional or state habitat conservation plans. Therefore, the proposed Project would not conflict with any adopted HCP, and would have a less than significant impact.

7. CULTURAL RESOURCES. Would the project:

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

WHY? The existing Pasadena Unified School District Project site is not located within the City of Pasadena’s designated historic properties list (January 27, 2009). The property was constructed between 1952 to 1973. In addition, there are no known buildings, structures, natural features, works of art or similar objects on the site having a significant historic value to the City, which are to be demolished, relocated, removed, or significantly altered by the Project. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a historical resource, and the Project would have less than significant impact.

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

WHY? The Project site does not contain undisturbed surficial soils. The site is currently developed and used as the Pasadena Unified School District Service Center. If archaeological resources once existed on-site, it is likely that previous grading, construction, and modern use of the site have either removed or destroyed them. Consequently, surficial soils on the Project site are devoid of archaeological resources.

In addition, development of the proposed Project would not involve grading to establish building pads or grading that would encroach into undisturbed soils. However, there is always the possibility that ground-disturbing activities during construction will uncover previously unknown, buried cultural resources. In the event that buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource required further study. The qualified archaeologist shall make recommendations to the PSUD on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Therefore, implementation of the above standard criteria in the case of accidental discovery of archaeological resources will reduce Project impacts to less than significant.

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

WHY? The Project site lies on the valley floor in an urbanized portion of the City of Pasadena. This portion of the City does not contain any unique geologic features and is not known or expected to contain paleontological resources. In addition, development of the proposed Project would not involve grading to establish building pads or grading that would encroach into undisturbed soils. However, there is always the possibility that ground-disturbing activities during construction will uncover previously unknown, buried cultural resources. In the event that buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource required further study. The qualified archaeologist shall make recommendations to the PSUD on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Therefore, implementation of the above standard criteria in the case of accidental discovery of paleontological resources will reduce Project impacts to less than significant.

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

WHY? There are no known human remains on the site. The Project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. Thus, human remains are not expected to be encountered during construction of the proposed Project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the Project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. Compliance with these regulations would ensure the proposed Project would not result in significant impacts due to disturbing human remains. (If the remains are determined to be Native American, pursuant to Public Resources Code Section 5097.98, the Gabrieleño/Tongva Tribal Council should be contacted at (626) 286-1632 or by e-mail at <http://www.tongva.com/>.)

8. ENERGY. Would the proposal:

a. Conflict with adopted energy conservation plans?

WHY? Implementation of the Project involves the adaptive re-use of an existing warehouse within the PUSD's Service Center. The proposed Project consists of the renovation of the existing 52,500 square-foot building and to develop a Central Kitchen and Advanced Culinary Arts and Hospitality Academy. Consequently, development of the Project's facilities will be consistent with the City's 1983 adopted Energy Element of the General Plan. In addition, due to the Project's re-use of the PUSD's existing District Service Center, the proposed intensity of the Project is within the intensity allowed by the Zoning Code and envisioned in the City's approved General Plan. Furthermore, the Project will meet or exceed the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). The Project's design features that meet these performance standards will include high-efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation

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features, higher than required rated insulation and double-glazed windows. Therefore, the Project will not conflict with adopted energy conservation plans and impacts in this regard will be less than significant.

b. Use non-renewable resources in a wasteful and inefficient manner?

Why? The proposed Project will not create a high enough demand for energy to require development of new energy sources. Construction of the Project will result in a short-term insignificant consumption of oil-based energy products during the construction phase of the Project. However, the additional amount of resources used during construction will not cause a significant reduction in available supplies.

The long-term impact from increased energy use by the Project is not significant in relationship to the existing facility uses. Currently, the PUSD District Service Center property provides space for the following PUSD land use components: Kitchen Facilities, Food Service Operations, Curriculum/Learning Material Storage (Curriculum Resource Center), and Archives Record Retention. In addition to the aforementioned land use components, the PUSD Professional Development Center formerly operated within the existing building on the Project site but was recently relocated (late year 2009). The Professional Development Center provides training and development for approximately 40 to 50 persons per session. Implementation of the Project involves obtaining entitlements to adaptively re-use the PUSD's existing District Service Center. Consequently, implementation of the Project will not create a significant increase in the usage of non-renewable energy over the existing conditions.

Electrical and natural gas supplies are available from existing mains, lines and substations in the area. In addition, implementation of the Project will result in an increase in the consumption of electricity and natural gas; however by adherence to the performance standards of California Energy Code, Part 6 of the California Building Standards Code Title 24 impacts to electricity and gas will be reduced to a level of less than significant. Moreover, Project design features that meet these performance standards will include high efficiency HVAC and hot water storage tank equipment, lighting conservation features, and double-glazed windows. These Project design features will be subject to design review and compliance with the California Department of Education Code. Complying with the California Department of Education standards will ensure that the Project is appropriately designed to reduce consumption of non-renewable energy use by the Project to a level of less than significant.

9. GEOLOGY AND SOILS. Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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

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The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. Pasadena is in four USGS Quadrants, the Los Angeles, and the Mt. Wilson quadrants were mapped for earthquake fault zones under the Alquist-Priolo Act in 1977. The Pasadena and Condor Peak USGS Quadrangles have not yet been mapped per the Alquist-Priolo Act.

These Alquist-Priolo maps show only one Fault Zone in or adjacent to the City of Pasadena, the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. This fault is located primarily south of City limits, however, the southernmost portions of the City lie within the fault's mapped Fault Zone. The 2002 Safety Element of the City's General Plan identifies the following three additional zones of potential fault rupture in the City:

- The Eagle Rock Fault Hazard Management Zone, which traverses the southwestern portion of the City;
- The Sierra Madre Fault Hazard Management Zone, which includes the Tujunga Fault, the North Sawpit Fault, and the South Branch of the San Gabriel Fault. This Fault Zone is primarily north of the City, and only the very northeast portion of the City and portions of the Upper Arroyo lie within the mapped fault zone.
- A Possible Active Strand of the Sierra Madre Fault, which appears to join a continuation of the Sycamore Canyon Fault. This fault area traverses the northern portion of the City as is identified as a Fault Hazard Management Zone for Critical Facilities Only.

The Project site is not within any of these potential fault rupture zones. The closest mapped fault zone, the Sierra Madre Fault Zone, is approximately 0.5 mile south from the Project site. Therefore, the proposed Project would not expose people or structures to potential substantial adverse effects caused by the rupture of a known fault. No related significant impacts would result from the proposed Project.

ii. Strong seismic ground shaking?

WHY? See 9.a.i.

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

However, the existing building was approved by the Division of the State Architect (DSA) in 1969, which identifies and understands the function of various structural elements necessary to resist seismic, wind and gravity loads. Buildings approved by DSA are inspected in accordance with the California Building Codes and DSA approved construction standards. The existing structure conforms to these required standards and ensures that the proposed Project would not result in significant impacts due to strong seismic ground shaking.

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

WHY? The Project site is not within a Liquefaction Hazard Zone or Landslide Hazard Zone as shown on Plate P-1 of the 2002 Safety Element of the General Plan. This Plate was developed considering the Liquefaction and Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the Project will have a less than significant impact from seismic related ground failure.

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?

WHY? The Project site is not within a Landslide Hazard Zone as shown on Plate P-1 of the 2002 Safety Element of the General Plan. This Plate was developed considering the Earthquake-Induced Landslide areas as shown on the State of California Seismic Hazard Zone maps for the City. Therefore, the project will have less than significant impacts from seismic induced landslides.

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

WHY? Construction of the Project consists of interior remodeling and exterior improvements to an existing PUSD warehouse. In addition, a total of approximately 48,400 square feet of existing asphalt would be removed, recycled, and replaced; 730 sq-ft of existing concrete driveways would be removed, hauled offsite and replaced; 17,260 square feet of concrete would be added for sidewalks, driveways and other onsite surface coverage. Currently, the Project site is generally level and not subject to high erosion potential, that would result in down cutting, sheet wash, slumping, or bank failures from heavy rain events. Moreover, the Project design does not propose significant changes in site elevation or excessive stormwater discharges that would result in a high potential for erosion. The minimal removal and replacement of asphalt fill soil and older alluvium/alluvial fan deposits (native soil) currently on the site may be subject to wind erosion without proper controls. Construction activities associated with the Project will expose soil, making it susceptible to soil erosion or loss of topsoil. However, the District will have prepared an erosion control plan to minimize erosion during construction, and such plan will be prepared in compliance with California Department of Education requirements and the requirements and standards of the Los Angeles Regional Water Quality Control Board (RWQCB).

In addition, the minimal excavation and grading activities that would occur will be carried out pursuant to a National Pollutant Discharge Elimination System (NPDES) permit that requires adoption of appropriate Storm Water Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) to reduce erosion from stormwater runoff. During construction, the Project will also comply with SCAQMD Rule 403 (Fugitive Dust Emissions Control), which includes BMP's such as watering controls to prevent equipment from tracking dirt off-site, and cessation of grading during high wind conditions. Therefore, impacts to soil erosion or topsoil loss will be less than significant.

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b. *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?*

WHY? The City of Pasadena rests primarily on an alluvial plain. To the north the San Gabriel Mountains are relatively new in geological time. These mountains run generally east-west and have the San Andreas Fault on the north and the Sierra Madre Fault to the south. The action of these two faults in conjunction with the north-south compression of the San Andreas tectonic plate is pushing up the San Gabriel Mountains. This uplifting combined with erosion has helped form the alluvial plain. As shown on Plate 2-4 of the Technical Background Report to the 2002 Safety Element, the majority of the City lies on the flat portion of the alluvial fan, which is expected to be stable.

Consequently, the proposed Project is not located on known unstable soils or geologic units, and therefore, would not likely cause on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. In addition, compliance with modern engineering practices and established building standards, including the California Building Code, during re-use of the existing building will reduce any significant impacts from unstable geologic units or soils to a level of less than significant.

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

WHY? According to the 2002 adopted Safety Element of the City's General Plan, the Project site is underlain by alluvial material from the San Gabriel Mountains. This soil consists primarily of sand and gravel and is in the low to moderate range for expansion potential. However, as previously stated, however, the Division of the State Architect (DSA) in 1969, which identifies and understands the function of various structural elements necessary to resist seismic, wind and gravity loads, approved the existing building. Buildings approved by DSA are inspected in accordance with the California Building Codes and DSA approved construction standards. Approval by the DSA reduces any significant impacts from expansive soil to a level of less than significant.

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?*

WHY? The Project will be required to connect to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case, and the proposed Project would have no associated impacts.

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10. GREENHOUSE GAS EMISSIONS. Would the project:

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

WHY? The Project would generate Carbon Dioxide, which is the primary component of Greenhouse gases (GHG). Thus, the Project would contribute to global warming as described by the Intergovernmental Panel on Climate Change. Using the results from the URBEMIS emission model and emission information derived from the SCAQMD, the proposed Project construction would generate approximately 121 metric tons of carbon dioxide from the demolition of the existing surfaces, grading of the active surfaces, paving of the active surfaces, interior building construction, and architectural coating of the interior and exterior surfaces. The long-term operation of the proposed Project involving vehicle trips to and from the proposed project, natural gas usage for heating, and landscape equipment would generate a net increase of 435 metric tons per year of carbon dioxide compared to the existing operations. The carbon dioxide emission estimates are shown in Table 7.

Table 7: Summary of Greenhouse Gas Emissions

Activity	CO ₂ Emissions (metric tons)
Construction	121
Operation	
Existing	255
Proposed	690
Net Change	+435

Source: see Appendix A for the Greenhouse gas emission output.

After amortizing the construction emissions over 30 years as recommended by the SCAQMD, the total proposed Project related net increase in carbon dioxide emissions is 439 metric tons per year of CO_{2e}. To put this level of emissions into perspective, the SCAQMD (SCAQMD 2009) is currently developing quantifiable GHG significance thresholds for different types of land uses. The SCAQMD recommended GHG significance thresholds range from 1,400 metric tons per year of CO_{2e} for commercial projects to 3,500 metric tons per year of CO_{2e} for residential projects. While the SCAQMD thresholds have not been formally adopted at the time of the preparation of this document, the GHG emissions from the proposed Project is significantly less than the lowest SCAQMD threshold.

The relative size of the proposed Project in comparison to the estimated GHG reduction goal as adopted by the CARB of 174 MMTCO_{2e} by 2020 is 0.0002 percent of that total, and therefore its incremental effect is not cumulatively considerable. Based on the level of Project construction and operation GHG emissions estimates, it is not anticipated that the proposed Project GHGs alone would substantially add to the global inventory of GHG emissions.

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

WHY? Emission reductions in California alone would not be able to stabilize the concentration of GHGs in the earth's atmosphere. However, California's actions set an example and drive progress towards a reduction in GHGs elsewhere. If other states and countries were to follow California's emission reduction targets, this could avoid medium or higher ranges of global temperature increases. Thus, severe consequences of climate change could also be avoided.

Neither the Pasadena Unified School District, City of Pasadena nor the SCAQMD presently has implemented a climate plan, policy or regulation for the purpose of reducing greenhouse gases. However, the design of the proposed Project contains several noteworthy design features that are designed to reduce GHG emissions and strategies contained within the AB32 Scoping Plan. These design features include day lighting and natural ventilation in the building design, use of recycled materials, use of energy efficient and water saving systems, use verdant sustainable planting, and incorporate sustainable storm water management with landscape features.

Therefore, although the construction and operation of the propose Project would generate a very small amount of GHGs, either directly or indirectly, the emissions would not have a significant impact on the environment and not prevent the attainment of the goals of AB32 and its Scoping Plan.

11. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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

WHY?

Short-Term Impacts

Construction activities associated with the proposed PUSD Central Kitchen would use a limited amount of hazardous materials. Construction vehicles onsite may require routine or emergency maintenance that could result in minor releases of oil, diesel fuel, transmission fluid, or other materials. Relevant construction material may include asphalt, tar, paints, coatings and solvents. These would be on a limited basis, both in terms of volume and duration by professionals trained in their appropriate use. The potential for the release of these materials is low and, even if a release were to occur, it would not result in a significant hazard to the public, surrounding uses, or the environment due to the small quantities of these materials associated with construction vehicles.

Long-Term Impacts

The Project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers and cleaning agents required for normal maintenance of the structure and landscaping. The Project must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. Further there is no evidence that the site has been used for underground storage of hazardous materials.

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In addition, operation of the proposed Kitchen would also involve the storage and use of small quantities of hazardous materials such as cleaning products and cooking oil waste. The scale of operation would not create a significant human health hazard or a threat to the environment in the case of accidental spill and release. The cafeteria would be subject to standard regulatory requirements for food preparation and disposal. With safeguards outlined above, the storage and use of hazardous materials in association with the operation of the Project would not create a significant impact.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

WHY? As discussed in Impact 11 (a), short-term construction activities associated with the proposed Project would use a limited amount of hazardous materials. Consequently, the potential for accidental release of these materials into the environment is low. In addition, potential long-term impacts from the operation of the school facilities, which are also discussed under Impact 11 (a), would not create significant adverse impacts regarding the likely release of hazardous materials nor create a significant hazard to the public or the environment. Therefore, the Project will have a less than significant impact related hazards due to the possible release of hazardous materials.

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

WHY? Implementation of the Project will be consistent with California Education Code Section 17213, Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186, which contain specific requirements for the evaluation of hazards near proposed school sites. Consistency with California Education Code Section 17213, Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186 will ensure that impacts from hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste will be reduced to a level of less than significant.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

WHY? According to the California Environmental Protection Agency (Cal EPA), the Department of Toxic Substances Control (DTSC) is required to compile and update a list of all hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health Safety Code ("HSC"). Upon review of the Cal EPA Cortese List online (April 13, 2010), the City of Pasadena contains one (1) site designated as a State Response or National Priorities List (NPL). The NPL site is located approximately 1.20 miles northwest of the Project site. According to the Cal EPA Cortese List, the NPL site consists of a Jet Propulsion Laboratory and is listed as a "cleanup status" undergoing remediation. Although the NPL site is located within the Project area, due to the distance to the proposed Project's facilities (1.20 miles), impacts to the proposed Project will be less than significant.

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In addition, according to the Cal EPA Cortese List online, a Geotracker LUFT is located approximately 490 feet southwest of the proposed school facilities, at the Caltrans Maintenance Station (2122 North Windsor Avenue Altadena, CA 91001). In addition, a Geotracker LUFT is located approximately 130 feet west of the proposed school facilities, at the California Highway Patrol (2130 Windsor Ave. Altadena, CA 91001). Both LUFT site's are currently under investigation; however, elevation levels at the LUFT site are down gradient to the proposed Project site (ranging from approximately six (6) to ten (10) feet lower in elevation compared to the Project site). Consequently, due to the LUFT site's location to the Project site, impacts will be less than significant. Therefore, no significant hazardous soils are anticipated to be present on the Project site.

d. 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?

WHY? The Project site is not within an airport land use plan or within two miles of a public airport or public use airport. The nearest public use airport is the Bob Hope Airport in Burbank, which is located approximately 10.45 miles west of the Project site and is operated by a Joint Powers Authority with representatives from the Cities of Burbank, Glendale and Pasadena. Therefore, the Project would not result in a safety hazard for people residing or working in the vicinity of an airport and would have no associated impacts.

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

WHY? The Project site is not within the vicinity of a private airstrip. Therefore, the Project would not result in a safety hazard for people residing or working in the vicinity of a private airstrip and would have no associated impacts.

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

WHY? The PUSD proposes to adaptively re-use the existing building that is located at the PUSD's District Service Center (an existing warehouse facility), currently located at 740 West Woodbury Road in the City of Pasadena, California. Consequently, implementation of the Project would not place any permanent or temporary physical barriers on any existing public streets.

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

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

WHY? As shown on Plate P-2 of the 2002 Safety Element, the Project site is not in an area of moderate or very high fire hazard. In addition, the Project site is surrounded by urban development and not adjacent to any wildlands. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires, and the Project would have no associated impacts.

12. HYDROLOGY AND WATER QUALITY. Would the project:

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

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

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

Compliance with the SQMP is ensured by Section 402 of the CWA, which is known as the NPDES. Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated Cities therein, including the City of Pasadena, obtained an MS4 (Permit # 01-182) from the Los Angeles RWQCB, most recently in 2001. Under this MS4, each permitted municipality is required to implement the SQMP.

In accordance with the County-wide MS4 permit, the Project must comply with the SQMP. In addition, as required by the MS4 permit, the Project is required to implement a SWPPP to ensure new developments comply with SQMP. Consequently, the Project is subject to the Statewide NPDES permit for construction related activities from the SWRCB. In addition, the Project will prepare and implement a Project-specific SWPPP, which will demonstrate compliance with the State NPDES permit, and provide protection of water quality during construction and operation of the Project and will submit the SWPPP to the Los Angeles RWQCB along with the required Notice of Intent prior to commencement of grading activities. In addition, the imposition of BMP's ensure that federal and State water quality standards will not be violated and are considered less than significant without mitigation.

Typically, the following would occur during construction of the Project:

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- Erosion control. Employ measures to prevent the movement of soil by wind or water during construction and may include watering, and physical barriers to the movement of soil particles.
- Tracking of Soil. Employ measures to effectively minimize the tracking of soil by vehicles and may include gravel driveways, wheel washes and street sweeping.
- Wastes and Cleanup. The SWPPP must also address washout, cleanup and disposal related to debris, trash, concrete, asphalt, paint, coatings, solvents and other materials applicable to preparation and construction at the Project site.
- Other Reasonable BMPs. The SWPPP must also implement other applicable BMP's as needed to keep pollutants away from stormwater. The SWPPP must also identify additional applicable measures taken during the storm season and when storms are anticipated.

Long-Term Operational Impacts

Once the Project is operational, on-site storm water flows will come into contact with developed surfaces that may contain pollutants. The primary potential source areas for pollutants include parking lots, refuse storage areas, and outside storage areas. Common pollutant sources associated with the Project could include trash, food waste, and detergents. Although the landscape palette will emphasize drought tolerant and native plants, impacts to water quality can be minimized by employing BMP's, emphasizing good housekeeping measures and storage practices, which keep potential pollutant sources separated from stormwater. The inclusion of the aforementioned Project design features and BMP's will treat future storm water runoff to levels of water quality deemed acceptable by the Los Angeles RWQCB. Less than significant impacts to water quality will result.

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

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

The Project will use the existing water supply system provided by the Pasadena Department of Water and Power. The source of some of this water supply is ground water, stored in the Raymond Basin. Thus, the Project could indirectly withdraw groundwater. However, the proposed water usage would be negligible in comparison to the existing warehouse facilities located on the Project site. Consequently, this minor amount of water use would not result in significant impacts from depletion of groundwater supplies.

In addition, as noted in response 8 b, the Project must comply with the Water Conservation Plan, and the Water Shortage Procedures Ordinance and the City's goal to meet the 20x2020 goals by submitting a water-conservation plan limiting the water consumption to 80 percent of its originally anticipated amount. With submission of this plan, the Project will not have any individual or cumulative impacts on water supply. This plan is subject to review and approval by the City's Water and Power Department and the Building Division before the issuance of a building permit. The District's irrigation and plumbing plans are also required to comply with the approved water-conservation plan.

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

WHY? The Project site is currently virtually flat (or gently sloping), and runoff onsite drains as sheet flow from a northeast to southwest direction. The Project site does not contain any discernable streams, rivers, or other drainage features. The proposed improvements will not alter the drainage pattern of the existing school facility; however, erosion and siltation reduction measures will be implemented during construction of the Project by developing and implementing a Project-specific SWPPP, which will demonstrate compliance with the State NPDES permit, and provide protection of water quality during construction and operation of the Project and will submit the SWPPP to the Los Angeles RWQCB along with the required Notice of Intent prior to commencement of grading activities. In addition, the imposition of BMP's ensure that federal and State water quality standards will not be violated and are considered less than significant without mitigation.

The inclusion of the aforementioned measures and BMP's will reduce impacts to the existing drainage pattern of the site or area to a level of less than significant.

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

WHY? As previously discussed, the Project would not involve changes in the site's drainage patterns and does not involve altering a discernable drainage course. Consequently, implementation of the proposed Project is not expected to cause flooding. Regardless, the Project's potential to cause flooding would be eliminated by developing and implementing a Project-specific SWPPP. Compliance with SWPPP requires post-development peak storm water runoff rates to not exceed pre-development peak storm water runoff rates.

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

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

WHY? The PUSD proposes to adaptively re-use an existing building that is located at the PUSD's District Service Center (an existing warehouse facility). In addition, a total of approximately 48,400 square feet of existing asphalt would be removed, recycled, and replaced; 730 sq-ft of existing concrete driveways would be removed, hauled offsite and replaced; 17,260 square feet of concrete would be added for sidewalks, driveways and other onsite surface coverage. Although implementation of the Project will add an additional 17,260 square feet of concrete to the Project site, the total increase of impermeable surfaces is minimal and would not result in a significant contribution to runoff.

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Similarly, as discussed above in Sections 12.a) and 12.c), the Project would generate only typical, non-point source, urban stormwater pollutants. These pollutants are covered by the County-wide MS4 permit, and the Project, through the SWPPP, is required to implement BMPs to reduce stormwater pollutants to the maximum extent practicable. Therefore, the proposed Project would not create runoff that would exceed the capacity of the storm drain system and would not provide a substantial additional source of polluted runoff. Therefore, impact will be less than significant.

f. Otherwise substantially degrade water quality

WHY? As previously discussed, the proposed Project will not be a point-source generator of water pollutants. The only long-term water pollutants expected to be generated onsite are typical urban stormwater pollutants. Compliance with the SWPPP will ensure these stormwater pollutants would not substantially degrade water quality.

The Project, however, also has the potential to generate short-term water pollutants during construction, including sediment, trash, construction materials, and equipment fluids. The County-wide MS4 permit requires construction sites to implement BMPs to reduce the potential for construction-induced water pollutant impacts. These BMPs include methods to prevent contaminated construction site stormwater from entering the drainage system and preventing construction-induced contaminants from entering the drainage system. The MS4 identifies minimum requirements for construction sites in Los Angeles County. Complying with the both the MS4's construction site requirements and the State's General Construction Permit, as well as implementing a SWPPP will ensure that construction of the proposed Project would not substantially degrade water quality. Therefore, impacts in this regard will be less than significant.

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

WHY? The Project does not propose to develop housing uses within the Project site. In addition, no portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate 3-1, of the adopted 2002 Safety Element of the City's General Plan) the Project is not located in a dam inundation area. Therefore, impacts from place housing within a 100-year flood hazard area will be less than significant.

h. Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

WHY? As previously described, no portions of the City of Pasadena are within a 100-year floodplain identified by the FEMA. As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. Therefore, the proposed Project would not

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place structures within the flow of the 100-year flood, and the Project would have a less than significant impact.

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

WHY? As previously described, no portions of the City of Pasadena are within a 100-year floodplain identified by the FEMA. As shown on FEMA map Community Number 065050, the entire City is in Zone D, for which no floodplain management regulations are required. In addition, according to the City's Dam Failure Inundation Map (Plate P-2, of the adopted 2002 Safety Element of the City's General Plan) the Project is not located in a dam inundation area. Therefore, the Project would have a less than significant impact from exposing people or structures to flooding risks, including flooding as a result of the failure of a levee or dam.

j. Inundation by seiche, tsunami, or mudflow?

WHY? The City of Pasadena is not located near enough to any inland bodies of water or the Pacific Ocean to be inundated by either a seiche or tsunami. In addition, the Project site is not within a Landslide Hazard Zone, as shown on Plate P-1 of the 2002 Safety Element of the General Plan, and would therefore not have a significant impact in regards to mudflow. Consequently, impacts from inundation by seiche, tsunami, or mudflow will be less than significant.

13. LAND USE AND PLANNING. Would the project:

a. Physically divide an existing community?

WHY? The Project will not physically divide an existing community, as the site is surrounded by similar development on all sides, and the Project consists of an infill development within a highly urbanized area. No adverse impact will result.

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?

WHY? The Project is consistent with both the General Industrial zoning designation and the Industrial General Plan Land Use Designation in the adopted 2004 Land Use Element. As per the 2004 Land Use Element, General Industrial zoning designation are intended to accommodate a range of industrial activities, including manufacturing and wholesale, research and development and assembly activities. It is the intent of the Land Use Element to provide a variety of industrial uses in the City, in order to facilitate the

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manufacture and provision of goods and services and to provide employment for the community. While the primary use is for industrial activities, supportive uses such as small-scale eating establishments and maintenance and service facilities are also allowed. Implementation of the Project proposes to re-use the existing PUSD’s District Service Center (an existing warehouse facility) and develop a Central Kitchen and Advanced Culinary Arts and Hospitality Academy. Therefore, the uses proposed by the Project are consistent with General Industrial zoning designation within the 2004 Land Use Element and implementation of the Project will have a less than significant impact.

c. Conflict with any applicable HCP or NCCP?

WHY? Currently, there are no adopted HCP or NCCPs within the City of Pasadena. There are also no approved local, regional or state HCPs. Furthermore, implementation of the Project proposes to re-use the existing PUSD’s District Service Center (an existing warehouse facility). Therefore, the Project site is currently developed and impacts to applicable habitat conservation plans will be less than significant.

14. MINERAL RESOURCES. Would the project:

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

WHY? No active mining operations exist in the City of Pasadena. There are two areas in Pasadena that may contain mineral resources. These two areas are Eaton Wash, which, was formerly mined for sand and gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate. The Project is not near these areas. Therefore, impacts to the loss of availability of a known mineral resource would be less than significant.

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

WHY? The City’s 2004 General Plan Land Use Element does not identify any mineral recovery sites within the City. Furthermore, there are no mineral-resource recovery sites shown in the Hahamongna Watershed Park Master Plan; or the 1999 “Aggregate Resources in the Los Angeles Metropolitan Area” map published by the California Department of Conservation, Division of Mines and Geology. No active mining operations exist in the City of Pasadena and mining is not currently allowed within any of the City’s designated land uses. Therefore, the proposed Project would have a less than significant impact from the loss of a locally-important mineral resource recovery site. See also Section 14.a) of this document.

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15. NOISE. Will the project result in:

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

WHY?

The Project itself will not lead to a significant increase in ambient noise. The Project does not involve installing a stationary noise source, and the only long-term noise generated by the Project would be typical urban environment noise. Furthermore, in Pasadena many urban environment noises, such as leaf-blowing and amplified sounds, are subject to restrictions by Chapter 9.36 of the Pasadena Municipal Code.

The Project would generate short-term noise due to construction activities. However, the Project will adhere to City regulations governing hours of construction, noise levels generated by construction and mechanical equipment, and the allowed level of ambient noise (Chapter 9.36 of the Pasadena Municipal Code). In accordance with these regulations, construction noise will be limited to normal working hours (7 a.m. to 7 p.m. Monday through Friday, 8 a.m. to 5 p.m. on Saturday, in or within 500 feet of a residential area). A construction related traffic plan is also required to ensure that truck routes for transportation of materials and equipment are established with consideration for sensitive uses in the neighborhood.

The Project would also not expose persons to excessive noise. The 2002 adopted Noise Element of the Comprehensive General Plan contains objectives and policies to help minimize the effects of noise from different sources. According to Figure 3 of the City's Noise Element (2002), the Project site lies between the 65 and 70 dBA noise contours. This level of noise is within the "Clearly Acceptable" range for the proposed land use (i.e. 70 dBA), as shown in Figure 1 of the City's Noise Element (2002). Therefore, the Project would not expose future patrons of the proposed Project to noise levels in excess of the City of Pasadena standards.

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

WHY? The Project is not located near any sources of groundborne noise or vibration. In addition, there are no sensitive receptors located near the Project site; therefore, construction and operation of the Project will not result in any excessive groundborne noise levels or groundborne vibration to nearby sensitive receptors. Moreover, there are no such vibration or groundborne sources associated with the proposed Project. Therefore, impacts in regards to groundborne vibration will be less than significant.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

WHY? The Pasadena Noise Ordinance (2002) has a noise level threshold for Industrial uses of no more than 70 dBA. The existing school facilities currently generate ambient noise generally from offsite roadway noise associated with vehicles traveling to and from the Project site. However, Project noise will be similar

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to those at the existing PUSD facilities. Onsite noise generated by Project activities and onsite vehicles at the Project site will also represent a permanent increase in ambient noise, similar to those at the existing PUSD facilities.

As a worst case scenario, the intersection of Woodbury Road at Cañada Avenue will experience the greatest increase in traffic. Vehicular noise along Woodbury Road at Cañada Avenue was evaluated to estimate existing and future roadway noise levels from mobile traffic (See Appendix B). The existing and future roadway noise levels were projected using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model (RD-77-108). The FHWA model is based upon reference energy mean emission levels (REMEL) for automobiles, medium trucks (2 axles), and heavy trucks (3 or more axles), with consideration given to vehicle volume and speed, roadway configuration, distance to the receiver, and the acoustical characteristics of the site. Table 8 shows the existing and projected noise levels for Woodbury Road at Cañada Avenue that would be affected by the Project, based on a distance of 50-feet from road centerlines.

Table 8: Existing and Projected Traffic Noise

Roadway	Existing	Opening Year without Project (2011)	Opening Year with Project (2011)	Increase from Existing	Increase from Future without Project
Woodbury Road at Cañada Avenue	64.7 dBA	65.1 dBA	65.1 dBA	0.4	0.0
*Values are in dBA Ldn and are based on 50-foot distance from street centerline.					

As can be seen within Table 8, the 70-dBA exterior noise criterion is not exceeded under existing conditions for opening year 2011 with or without the Project for the intersection of Woodbury Road at Cañada Avenue. Therefore, impacts in regards to increased traffic noise will be less than significant.

On-Site Impacts

Noise Created by the Project

The existing school facilities produce long-term onsite noise primarily from industrial and warehouse activities including onsite traffic and parking. Implementation of the proposed Project will create similar long-term onsite noise in comparison to existing conditions. However, based on information provided by PUSD, vehicle trips associated with the Warehouse use occur infrequently (i.e., not on a typical daily, recurring basis) and are assumed to be nominal. Therefore, implementation of the Project will not have a significant permanent increase in noise and impacts will be less than significant.

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

WHY? The Project would generate short-term noise due to construction activities. However, the Project will adhere to City regulations governing hours of construction and noise levels generated by construction and mechanical equipment (Chapter 9.36 of the Pasadena Municipal Code). In accordance with these regulations, construction noise will be limited to normal working hours (7 a.m. to 7 p.m. Monday through Friday, 8 a.m. to 5 p.m. on Saturday, in or within 500 feet of a residential area). A construction related traffic plan is also required to ensure that truck routes for transportation of materials and equipment are

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established with consideration for sensitive uses in the neighborhood. Therefore, adhering to established City regulations will ensure that the Project would not result in a substantial temporary or periodic increase in noise levels.

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 expose people residing or working in the project area to excessive noise levels?

WHY? There are no airports or airport land-use plans in the City of Pasadena. The closest airport is the Bob Hope Airport (formerly the Burbank-Glendale-Pasadena Airport), which is located approximately 10.45 miles west of the Project site. Therefore, the proposed Project would not expose people to excessive airport related noise and would have no associated impacts.

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

WHY? There are no private-use airports or airstrips within or near the City of Pasadena. Therefore, impacts in this regard will be less than significant.

16. POPULATION AND HOUSING. Would the project:

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

WHY? The proposed Project involves the res-use and modification of an existing PUSD warehouse to become a central kitchen, which is consistent with the land use designations for the site (See Section 13 of this document). Therefore, the proposed Project is consistent with the growth anticipated and accommodated by the City's General Plan. Furthermore, the Project is located in a developed urban area with an established roadway network and in-place infrastructure. Thus, development of the proposed Project would not require extending or improving infrastructure in a manner that would facilitate off-site growth. Therefore, the proposed Project would not induce substantial population growth, and would have a less than significant impact.

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

WHY? The Project site does not contain any existing dwelling units. In addition, the Project site is located in an area consisting of industrial and commercial uses. Therefore, the proposed Project would not displace any residents or housing, and would have less than significant impacts.

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

WHY? As previously discussed, implementation of the Project will re-use an existing PUSD warehouse to become a central kitchen, consistent with Project’s land use designation within the Pasadena General Plan. Consequently, the Project will not involve the displacement of people and will therefore not result in necessitating the construction of replacement housing elsewhere. Therefore, the proposed Project would not displace any people, and would have a less than significant impact.

17. PUBLIC SERVICES. Will the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire Protection?

WHY? The Pasadena Fire Department (PFD) consists of 177 full time employees, 147 shift personnel, 30 Bureau / Administrative personnel. The closest PFD fire station to the Project site is the Pasadena Fire House 36, located at 1140 North Fair Oaks Avenue, approximately 1.31 miles southeast of the Project site. The estimated response time for the PFD to the Project site would be approximately 2.2 minutes (based on an average speed of 35 miles per hour). As outlined in Policy R-1 of the Pasadena General Plan Safety Element, “the City will ensure to the extent possible that fire services, such as fire equipment, infrastructure, and response times are adequate for all sections of the City.” Consequently, the City will ensure to the extent possible that fire response times to the Project site will remain adequate and will not have a significant impact.

Access roads (driveways) are required per the California Fire Code when any portion of a facility or any portion of an exterior wall of the first story of the building is located more than 150 feet from fire apparatus access. Continuous fire access roadways and public hydrants are provided within the Project site and area in order to allow adequate emergency access.

Inadequate fire flow demands would be considered a significant impact, but are remedied through the proper design of water infrastructure on-site in coordination with the PFD, and in compliance with State Department Education Code requirements. Therefore, implementation of the Project would result in a less than significant impact to fire protection.

b. Libraries?

WHY? The Project is located 4.6 miles south from the nearest public branch library. The proposed Project is a non-residential Project that would not directly increase the City’s population. In addition, the City as a

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whole is well served by its Public Information (library) System. Consequently, the Project would not significantly impact library services.

c. *Parks?*

WHY? The Project is located within 1.15 miles northwest of the nearest park, (La Pintoresca Park). As previously discussed, the proposed Project is a non-residential Project that would not directly increase the City's population. Consequently, the Project would not significantly impact parkland within the City of Pasadena.

d. *Police Protection?*

WHY? The Pasadena Police Department (PPD) provides police protection to the City. The closest station to the Project site is located at 207 N. Garfield Avenue, approximately 2.52 mile southeast of the Project site. Development of the proposed school facilities will not directly increase population into the City. Since the Project will not directly induce additional population into the City, the proposed Project will not result in the need for additional new or altered police protection services and will not alter acceptable service ratios or response times. Therefore, the proposed Project would not significantly impact police protection services.

e. *Schools?*

WHY? Currently, two schools are located within the Project area, which include the Jackson Elementary School, located at 593 W. Woodbury Road and Mura High School, located at 1905 Lincoln Avenue. The Project will have a positive impact on schools by providing additional school facilities within the Project site. Therefore, the Project will not adversely impact school services, but rather will increase the quality of education at the Pasadena Unified School District by providing needed facilities.

f. *Other public facilities?*

WHY? As previously discussed, the proposed Project is a non-residential Project that would not directly increase the City's population. Consequently, the Project would not significantly impact public facilities within the City of Pasadena.

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18. RECREATION.

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

WHY? The Project is located within 1.15 miles northwest of the nearest park, (La Pintoresca Park). As previously discussed, the proposed Project is a non-residential Project that would not directly increase the City's population. Consequently, the Project would not create substantial physical deterioration of the parks or other recreational facilities within the City of Pasadena.

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

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

19. TRANSPORTATION/TRAFFIC. Would the project:

a. Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

WHY? A Traffic Impact Study was prepared for the Project in April 9, 2010, by Linscott Law and Greenspan. This Traffic Impact Study is included as Appendix C of this Initial Study. The Traffic Impact Study analyzed the following five study intersections, located within the Project's vicinity:

1. Windsor Avenue-Arroyo Boulevard/Woodbury Road
2. Cañada Avenue/Woodbury Road
3. El Sol Avenue/Woodbury Road
4. Casitas Avenue/Woodbury Road
5. Lincoln Avenue/Woodbury Road

Traffic impacts at the study intersections were analyzed for the following conditions:

- [a] Existing conditions.
- [b] Condition [a] plus 1.5 percent ambient traffic growth through year 2011.
- [c] Condition [b] with completion and occupancy of the related projects.
- [d] Condition [c] with completion and occupancy of the proposed Project.
- [e] Condition [d] with implementation of project mitigation measures, where necessary.

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The five study intersections were evaluated using the Intersection Capacity Utilization (ICU) method of analysis which determines Volume-to-Capacity (v/c) ratios on a critical lane basis. The overall intersection v/c ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. Level of Service varies from LOS A (free flow) to LOS F (jammed condition). The significance of the potential impacts of Project generated traffic at each study intersection was identified using criteria set forth in the City of Pasadena's Transportation Impact Review Current Practice and Guidelines. According to the City's Sliding Scale Method for calculating the level of impact due to traffic generated by the proposed Project, a significant transportation impact is determined based on the criteria presented in Table 9, below.

Table 9: City of Pasadena Intersection Impact Threshold Criteria

Final v/c	Level of Service	Project Related Increase in v/c
0.000 - 0.600	A	equal to or greater than 0.06
> 0.600 - 0.700	B	equal to or greater than 0.05
> 0.700 - 0.800	C	equal to or greater than 0.04
> 0.800 - 0.900	D	equal to or greater than 0.03
> 0.900 - 1.000	E	equal to or greater than 0.02
> 1.000	F	equal to or greater than 0.01

Source: Table 8-1, Linscott Law and Greenspan, 2010.

Summaries of the v/c ratios or delay and LOS values for the study intersections during the AM and PM peak hours are shown in Table 10, below.

Table 10: Summary of Volume to Capacity Ratios and Levels of Service AM and PM Peak Hours

No.	Intersection	Peak Hour	Year 2010 Existing		Year 2011 w/ Ambient Growth		Year 2011 w/ Related Projects		Year 2011 w/ Project		Change In v/c	Sig. Impact
			v/c	LOS	v/c	LOS						
1	Windsor Ave- Arroyo Blvd/ Oak Grove Dr- Woodbury Rd	AM	0.700	B	0.70	C	0.715	C	0.71	C	0.001	NO
		PM	0.633	B	0.64	B	0.663	B	0.66	B	0.000	NO
2	Cañada Ave/ Woodbury Rd	AM	0.377	A	0.38	A	0.387	A	0.38	A	0.000	NO
		PM	0.406	A	0.41	A	0.429	A	0.43	A	0.003	NO
3	El Sol Ave/ Woodbury Rd	AM	0.379	A	0.38	A	0.389	A	0.39	A	0.005	NO
		PM	0.381	A	0.38	A	0.403	A	0.40	A	0.003	NO
4	Casitas Ave/ Woodbury Rd	AM	0.426	A	0.43	A	0.437	A	0.44	A	0.005	NO
		PM	0.401	A	0.40	A	0.423	A	0.42	A	0.000	NO
5	Lincoln Ave/ Woodbury Rd	AM	0.780	C	0.79	C	0.795	C	0.79	C	0.003	NO
		PM	0.771	C	0.78	C	0.797	C	0.79	C	0.001	NO

Source: Table 9-1, Linscott Law and Greenspan, 2010.

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Existing Conditions

According to the Traffic Impact Study, all five study intersections are presently operating at LOS C or better during the AM and PM peak hours under existing conditions (See column [1] of Table 10).

Existing With Ambient Growth Conditions

Growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors was assumed to be 1.5 percent per year through year 2011. This ambient growth incrementally increases the v/c ratios at all of the study intersections. Consequently, according to the Traffic Impact Study, all five study intersections are expected to continue operating at LOS C or better during the AM and PM peak hours with the addition of ambient growth traffic through the year 2011 (See column [2] of Table 10).

Future Pre-Project Conditions

According to the Traffic Impact Study, the proposed Project is expected to generate a net increase of 42 vehicle trips (34 inbound trips and 8 outbound trips) during the AM peak hour. During the PM peak hour, the proposed Project is expected to generate a net increase of 11 vehicle trips (13 inbound trips and 2 fewer outbound trips). Over a 24-hour period, the proposed Project is forecast to generate a net increase of 302 daily trip ends during a typical weekday (151 inbound trips and 151 outbound trips).

A forecast of on-street traffic conditions prior to occupancy of the proposed Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area. As shown in Table 11, the Traffic Impact Study included the following related projects within the Project area:

Table 11: List of Related Projects and Related Projects Trip Generation Forecast

No.	Project ¹	AM/PM Peak Hour Volumes ²
1	Upper Arroyo Seco Hahamonga Watershed Park Master Plan	253
2	Hahamonga Watershed Park Annex Project	79
3	PLN2006-0030 I	15
4	PRJ2008-01137	55
5	La Cañada Town Center	597
Total		999

Source: Table 6-1, Linscott Law and Greenspan, 2010.

[1] Sources: City of Pasadena Planning Department; ITE "Trip Generation", 8th Edition, 2008.

[2] Trips are one-way traffic movements, entering or leaving.

[3] Source: "Final Traffic Impact Study, HWP Annex Project, City of Pasadena, California", dated March 23, 2009, prepared by LLG Engineers.

[4] ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation average rates.

[5] ITE Land Use Code 521 (Private School K-12) trip generation average rates for the AM peak hour traffic volumes. ITE Land Use Code 530 (Middle School/Junior High School) trip generation average rates for the daily and PM peak hour traffic volumes.

According to the Traffic Impact Study, the v/c ratios at all of the study intersections will be incrementally increased with the addition of traffic generated by the related projects listed in Table 11. However, all five study intersections are expected to continue operating at LOS C or better during the AM and PM peak hours with the addition of ambient traffic growth and the traffic due to the related projects (See column [3] of Table 10).

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Future With Project Conditions

As shown in column [4] of Table 10, application of the City’s threshold criteria to the “With Proposed Project” scenario indicates that the proposed Project is not expected to create significant impacts at the five study intersections. Incremental, but not significant, impacts are noted at the study intersections. Consequently, due to no significant impacts at the Project study intersections, no traffic mitigation measures are required or recommended and impacts in regards to causing an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system will be less than significant.

b. *Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?*

WHY? The Congestion Management Program (CMP) is a state-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system.

As required by the 2004 Congestion Management Program for Los Angeles County, the Traffic Impact Study has analyzed the Project’s potential impacts on designated monitoring locations on the CMP highway system. The analysis has been prepared in accordance with procedures outlined in the 2004 Congestion Management Program for Los Angeles County, County of Los Angeles Metropolitan Transportation Authority, July 2004.

Intersections

The following CMP intersection monitoring locations in the Project vicinity have been identified:

<u>CMP Station</u>	<u>Intersection</u>
No. 119	Arroyo Parkway/California Boulevard Intersection
No. 120	Pasadena Avenue-Saint John Avenue/California Boulevard

The CMP TIA guidelines require that intersection monitoring locations must be examined if the proposed Project will add 50 or more trips during either the AM or PM weekday peak periods. The proposed Project will not add 50 or more trips, during the AM or PM peak hours at the CMP monitoring intersection, which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

Freeways

The following CMP freeway monitoring locations in the Project vicinity have been identified:

<u>CMP</u>	<u>Station</u>
No. 1056	Route 134 Freeway west of San Rafael Avenue Segment
No. 1060	I-210 Freeway west of Routes 134-710

The CMP TIA guidelines require that freeway monitoring locations must be examined if the proposed Project will add 150 or more trips (in either direction) during either the AM or PM weekday peak periods. The proposed Project will not add 150 or more trips (in either direction), during either the AM or PM weekday peak hours to the CMP freeway monitoring location, which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required.

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Therefore, implementation of the Project will not have a significant impact either individually or cumulatively to level of service standards established by the county congestion management agency for designated roads or highways.

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

WHY? The Project site is not within an airport land use plan or within two miles of a public airport or public use airport. Consequently, the proposed Project would not affect any airport facilities and would not cause a change in the directional patterns of aircraft. Therefore, the proposed Project would have a less than significant impact to air traffic patterns.

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

WHY? The Project has been evaluated by the Pasadena Department of Transportation (PasDOT) and its impact on circulation due to the proposed use and its design has been found not to be hazardous to traffic circulation either within the Project or in the vicinity of the Project. In addition, the Project's circulation design meets the City's engineering standards. Therefore, the proposed Project would not increase hazards due to a design feature or incompatible use, and would have no associated impacts.

e. Result in inadequate emergency access?

WHY? The ingress and egress for the site have been evaluated by the PasDOT and found to be adequate for emergency access or access to nearby uses. The Project does not involve the elimination of a through-route, does not involve the narrowing of a roadway, and all proposed roadways, access roads and drive lanes meet the Pasadena Fire Department's access standards.

Improvements to the Project site and existing structure will be subject to design review and compliance with the California Department of Education Code. Complying with the California Department of Education standards will ensure that the Project is appropriately designed to allow for adequate emergency access. Therefore, impacts to emergency access to the site will be less than significant.

f. Result in inadequate parking capacity?

WHY? Implementation of the Project will provide a total of 79 on-site parking spaces, including four handicap accessible spaces at the Project site. Currently, approximately 51 spaces exist at the site, which totals an increase of 28 parking spaces at the Project site. In addition, implementation of the Project will

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adaptively re-use the existing building that is located at the PUSD’s District Service Center (an existing warehouse facility), which would neither increase the demand for parking nor eliminate any existing parking spaces. Therefore, the proposed Project would have a less than significant impact to parking.

g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?

WHY? As required by the 2004 Congestion Management Program for Los Angeles County, a review has been made of the CMP transit service. According to the Traffic Impact Study’s CMP transit service review, a total of five (5) bus transit lines and routes are provided adjacent to or in close proximity to the Project site, with two of these transit lines and routes directly serving the site along the Project frontage. In addition, a total of two different bus transit providers provide service within the Project area. As outlined in the Traffic Impact Study, these five transit lines provide service for an average (i.e., an average of the directional number of buses during the peak hours) of approximately 21 buses during the AM peak hour and roughly 18 buses during the PM peak hour. Based on the Traffic Impact Study’s calculated peak hour transit trips, this would correspond to less than one transit rider per bus. Thus, given the low number of generated transit trips per bus, no impacts on existing or future transit services in the Project area are expected to occur as a result of the proposed Project.

In addition, according to the Traffic Impact Study, it is recommended that the District implement a Transportation Demand Management (TDM) program if PUSD does not have a current program in place. A TDM identifies opportunities to reduce parking demand and automobile dependency, as well as to promote alternative travel modes, with the focus on the employees of the PUSD Central Kitchen. Although the Traffic Impact Study recommended implementation of a TDM program, the Project will construct pedestrian access improvements to the Project site, in turn allowing employees to use alternative modes of transportation to the Project site and reducing parking demand and automobile dependency for employees of the PUSD Central Kitchen. Pedestrian access will be significantly enhanced with sidewalk and landscaping improvements along the Woodbury Road and Cañada Avenue property frontages. The District will install a new sidewalk along the entire Woodbury Road property frontage (i.e., from Cañada Avenue to Casitas Avenue). Landscaping improvements also will be installed along both the Cañada Avenue and Woodbury Road property frontages to enhance and encourage pedestrian activity near the Project site. Therefore, implementation of the Project will not conflict with adopted policies, plans, or programs supporting alternative transportation within Project site or area.

20. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Exceed wastewater treatment requirements of the applicable RWQCB?

WHY? Development of the Project will involve an onsite system for the collection of wastewater for conveyance to offsite public wastewater facilities. Wastewater conveyed from the site would ultimately reach the Los Angeles County Sanitation District’s trunk pipelines within the City. The Los Angeles County Sanitation District provides, under contract with Pasadena, the treatment of wastewater and the ultimate disposal of effluent and solids in compliance with the waste discharge requirements set by the California RWQCB. Wastewater conveyed from the site would undergo treatment in accordance with applicable

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regulations, including the requirements of the Water Quality Control Board. Therefore, impacts in this regard will be less than significant. See Impact 16 (b) for additional information on wastewater treatment.

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?*

WHY? The proposed Project involves the re-use and modification of an existing PUSD warehouse to become a central kitchen, and as a result, would not significantly increase the demand for water and wastewater service. The proposed water/wastewater service demand is negligible in comparison to the existing service areas of the water and wastewater service purveyors. Consequently, the facilities currently maintained by the service purveyors are adequate to serve the proposed Project. The only water and wastewater improvements required for the Project are on-site unit connections to the existing systems, which are subject to connection fees. Therefore, the proposed Project would not require or result in the construction or expansion of new water or wastewater treatment facilities off-site, and the Project would have a less than significant impacts.

In addition, the Project will be consistent with the PWP Water Conservation Initiative Program. In September 2008, Council directed PWP to develop a comprehensive water conservation plan with a variety of approaches and recommendations for achieving 10 percent, 20 percent and 30 percent reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the Comprehensive Water Conservation Plan presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10).

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, the City anticipates statewide water demand reduction requirements beginning in 2009, as a result of Governor Arnold Schwarzenegger's 20x2020 Water Conservation Plan from April 30, 2009 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program. Compliance with the aforementioned program further reduces impacts to a level of less than significant.

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?*

WHY? The project will not require the construction of new storm water drainage facilities or the expansion of existing facilities. The project is located in a developed urban area where storm drainage is provided by existing streets, storm drains, flood control channels, and catch basins. As discussed in Section 12, the Project would involve only minor changes in the site's drainage patterns and does not involve altering any drainage courses or flood control channels.

Furthermore, a NPDES permit will be prepared for the Project, which requires adoption of appropriate SWPPP and implementation of BMP's. The Project's storm drainage system will be comprised of multiple treatment methods to ensure the storm water will be cleaned and retained onsite to a level equal to or

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greater than the NPDES mandates. The Project's BMP's will include, but are not limited to, bio-swales, pervious pavers, bio-retention, and fossil fuel absorbent sponges. Implementation of the Project's BMP's will reduce pollutants to storm water and urban runoff from the Project site. In addition, it is anticipated that the Project's storm drainage system, in combination with the SWPPP and BMP's will be adequate to convey runoff from the site. Moreover, the Project is required to provide all necessary on-site infrastructures and to pay a development impact fee for storm drain facilities within the City. Therefore, impacts to storm water drainage facilities will be less than significant.

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

WHY? The adequacy of water supply is a potential problem for all new development since the Southern California region has been known to experience periods of drought and needs a long-term reliable water supply. However, implementation of the Project will involve the re-use and modification of an existing PUSD warehouse to become a central kitchen, and as a result, would not significantly increase the demand for water service. Therefore, this Project will not result in an increase of water usage in comparison to existing water uses. In addition, during periods of drought, this Project will be required to comply with the City's Water Shortage Procedures Ordinance, which reduces monthly water consumption to 90 percent of the expected consumption for this type of land use.

In addition, as noted in the response to 8b, in September 2008, Council directed PWP to develop a comprehensive water conservation plan with a variety of approaches and recommendations for achieving 10 percent, 20 percent and 30 percent reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the Comprehensive Water Conservation Plan presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10).

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, the City anticipates statewide water demand reduction requirements beginning in 2009, as a result of Governor Arnold Schwarzenegger's 20x2020 Water Conservation Plan from April 30, 2009 ("20x2020"), and the current work being done by the California Department of Water Resources, the SWRCB, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program. Compliance with the City's Water Shortage Procedures Ordinance will reduce impacts to water uses from the Project to a level of less than significant.

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

WHY? Wastewater conveyed from the site would ultimately reach the Los Angeles County Sanitation District's trunk pipelines within the City. The Los Angeles County Sanitation District provides, under contract with Pasadena, the treatment of wastewater and the ultimate disposal of effluent and solids in compliance with the waste discharge requirements set by the California RWQCB. Wastewater conveyed

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from the site would undergo treatment in accordance with applicable regulations, including the requirements of the Water Quality Control Board. In addition, the proposed Project involves the re-use and modification of an existing PUSD warehouse to become a central kitchen, and as a result, would not significantly increase the demand for wastewater service. The proposed wastewater service demand is negligible in comparison to the existing service areas of the Los Angeles County Sanitation District. Consequently, the facilities currently maintained by the Los Angeles County Sanitation District are adequate to serve the proposed Project. The only wastewater improvements required for the Project are on-site unit connections to the existing systems, which are subject to connection fees. Therefore, impacts in this regard will be less than significant.

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

WHY? Based on an estimated waste generation rate of 0.007 pounds, per square foot of building area, per day (California Integrated Waste Management Board, 2009 Estimated Solid Waster Generation Rates for Institutions) the existing 52,500 square feet of school facilities would generate approximately 367.5 pounds of solid waste per day. Implementation of the proposed Project involves the re-use and modification of the existing PUSD warehouse to become a central kitchen, and as a result, will produce similar amounts of solid waste per day as the existing facility. Consequently, the Project will not produce additional solid waste over existing conditions and will not result in the need for a new or in substantial alteration to the existing system of solid waste collection and disposal. Therefore, impacts in this regard are less than significant.

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

WHY? In 1992, the City adopted the "Source Reduction and Recycling Element" to comply with the California Integrated Waste Management Act. This Act requires that jurisdictions maintain a 50 percent or better diversion rate for solid waste. The City implements this requirement through Section 8.61 of the Pasadena Municipal Code, which establishes the City's "Solid Waste Collection Franchise System". As described in Section 8.61.175, each franchisee is responsible for meeting the minimum recycling diversion rate of 50 percent on both a monthly basis and annual basis. The proposed Project is required to comply with the applicable solid waste franchise's recycling system, and thus, will meet Pasadena's and California's solid waste diversion regulations. In addition, the Project complies with the City's Construction and Demolition Ordinance (PMC Section 8.62) and design requirements for refuge storage areas (PMC Section 17.64.240). Moreover, the Project does not meet the threshold for preparing a Construction Waste Management Plan as outlined in Chapter 8.62 of the Pasadena Municipal Code. Therefore, implementation of the Project will have a less than significant impact in regards to compliance with federal, state, and local statutes and regulations related to solid waste.

21. EARLIER ANALYSIS.

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

No program EIR, tiering, or other process can be used for analysis of the project's environmental effects.

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22. MANDATORY FINDINGS OF SIGNIFICANCE.

- a. *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

WHY? As discussed in Sections 3 and 5 of this document, the proposed Project would not have substantial impacts to Aesthetic or Air Quality. Also, as discussed in Section 6 and 12 of this document, the proposed Project would not have substantial impacts to special status species, stream habitat, and wildlife dispersal and migration. Furthermore, the proposed Project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. Similarly, as discussed in Section 7 of this document, the proposed Project would not have substantial impacts to historical, archaeological, or paleontological resources, and thus, would not eliminate any important examples of California history or prehistory. As discussed in Sections 12, 14 and 15 of this document, the proposed Project would not have substantial impacts to water quality, Mineral Resources or Noise.

Therefore, the Project will not substantially degrade the quality of the land, air, water, minerals, flora, fauna, noise and objects of historic or aesthetic significance and impacts will be less than significant.

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

WHY? The proposed Project would not cause impacts that are cumulatively considerable. The Project has the potential to contribute to cumulative air quality, biological resource, hydrology, water quality, noise, population, housing, public services, recreation, traffic, and utility impacts. However, none of these cumulative impacts are substantial, except for cumulative air quality conditions (i.e. the SCAB is a non-attainment basin) and the Project would not cause any cumulative impacts to become substantial. As discussed in Section 5.c. of this document, the Project’s contribution to the cumulative air quality scenario is not considerable. Therefore, the proposed Project does not have a Mandatory Finding of Significance due to cumulative impacts.

As noted in the response to 8b, in September 2008, Council directed PWP to develop a comprehensive water conservation plan with a variety of approaches and recommendations for achieving 10 percent, 20 percent and 30 percent reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the Comprehensive Water Conservation Plan presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10).

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No Impact

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established thirteen permanent mandatory restrictions on wasteful water use activities. In addition, the City anticipates statewide water demand reduction requirements beginning in 2009, as a result of Governor Arnold Schwarzenegger's 20x2020 Water Conservation Plan from April 30, 2009 ("20x2020"), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program.

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

WHY? As discussed in Sections 5, 11, 12, and 19 of this document, the proposed Project would not expose persons to the hazards of toxic air emissions, chemical or explosive materials, flooding, or transportation hazards. Although the Project area would be exposed to typical southern California earthquake hazards, modern engineering practices would ensure that geologic and seismic conditions would not directly cause substantial adverse effects on humans. In addition, as discussed in Sections 3 Aesthetics, 13 Land Use and Planning, 15 Noise, 16 Population and Housing, 17 Public Services, 18 Recreation, 19 Transportation/Traffic and 20 Utilities and Service Systems the Project would not indirectly cause substantial adverse effects on humans.

Therefore, the proposed Project would not have a Mandatory Finding of Significance due to environmental effects that could cause substantial adverse effects on humans.

INITIAL STUDY REFERENCE DOCUMENTS

- | # | Document |
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| 1 | Air Quality and Land Use Handbook: A Community Health Perspective, 2005. |
| 2 | Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code, revised January 1, 1994 official Mt. Wilson, Los Angeles and Pasadena quadrant maps were released March 25, 1999. |
| 3 | CEQA Air Quality Handbook, South Coast Air Quality Management District, revised 1993 |
| 4 | East Pasadena Specific Plan Overlay District, City of Pasadena Planning and Development Department, codified 2001 |
| 5 | Energy Element of the General Plan, City of Pasadena, adopted 1983 |
| 6 | Fair Oaks/Orange Grove Specific Plan Overlay District, City of Pasadena Planning and Development Department codified 2002 |
| 7 | Final Environmental Impact Report (FEIR) Land Use and Mobility Elements of the General Plan, Zoning Code Revisions, and Central District Specific Plan, City of Pasadena, certified 2004 |
| 8 | 2000-2005 Housing Element of the General Plan, City of Pasadena, adopted 2002. |
| 9 | Inclusionary Housing Ordinance Pasadena Municipal Code Chapter 17.71 Ordinance #6868 |
| 10 | Land Use Element of the General Plan, City of Pasadena, adopted 2004 |
| 11 | Mobility Element of the General Plan, City of Pasadena, adopted 2004 |
| 12 | Noise Element of the General Plan, City of Pasadena, adopted 2002 |
| 13 | Noise Protection Ordinance Pasadena Municipal Code Chapter 9.36 Ordinances # 5118, 6132, 6227, 6594 and 6854 |
| 14 | North Lake Specific Plan Overlay District, City of Pasadena Planning and Development Department, Codified 1997 |
| 15 | Pasadena Municipal Code, as amended |
| 16 | Recommendations On Siting New Sensitive Land Uses, California Air Resources Board, May 2005 |
| 17 | Regional Comprehensive Plan and Guide, "Growth Management Chapter," Southern California Association of Governments, June 1994 |
| 18 | Safety Element of the General Plan, City of Pasadena, adopted 2002 |
| 19 | Scenic Highways Element of the General Plan, City of Pasadena, adopted 1975 |
| 20 | Seismic Hazard Maps, California Department of Conservation, official Mt. Wilson, Los Angeles and Pasadena quadrant maps were released March 25, 1999. The preliminary map for Condor Peak was released in 2002. |
| 21 | South Fair Oaks Specific Plan Overlay District Planning and Development, codified 1998 |
| 22 | State of California "Aggregate Resource in the Los Angeles Metropolitan Area" by David J. Beeby, Russell V. Miller, Robert L. Hill, and Robert E. Grunwald, Miscellaneous map no. .010, copyright 1999, California Department of Conservation, Division of Mines and Geology |
| 23 | Storm Water and Urban Runoff Control Regulations Pasadena Municipal Code Chapter 8.70 Ordinance #6837 |
| 24 | Transportation Impact Review Current Practice and Guidelines, City of Pasadena, August, 2005 |
| 25 | Tree Protection Ordinance Pasadena Municipal Code Chapter 8.52 Ordinance # 6896 |
| 26 | West Gateway Specific Plan Overlay District, City of Pasadena Planning and Development Department codified 2001 |
| 27 | Zoning Code, Chapter 17 of the Pasadena Municipal Code |