

6.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

INTRODUCTION

Section 15128 of the State CEQA Guidelines requires an EIR to briefly describe any possible significant effects of a project that were determined not to be significant and were, therefore, not discussed in detail in the EIR. The items listed below were scoped out of the EIR.

AESTHETICS

CEQA Section 21099(d)(1) states, “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Section 21099(a) provides the following definitions of the terms “infill site” and “transit priority area”:

(4) “Infill site” means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

(7) “Transit priority area” means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

The proposed mixed-use project would be located on a previously developed site that is surrounded by developed land and that is located approximately 0.14 miles from the Metro Gold Line South Pasadena Station. Therefore, the project is on an infill site in a transit priority area; consequently, the aesthetic and parking impacts of the project cannot be considered significant impacts pursuant to CEQA. The analysis of aesthetic impacts below is presented for disclosure purposes.

Threshold: Have a substantial adverse effect on a scenic vista?

While there are no specifically designated scenic vistas in South Pasadena (City), the Open Space and Resource Conservation Element of the City’s General Plan states, “the hillsides and ridgelines of South Pasadena provide a scenic backdrop for the entire community.” The Open Space and Resource Conservation Element further stresses “protecting the ‘view shed,’ both from and to these hillsides,” with the following policy and strategy:

Policy 6.2: Discourage grading on ridgelines and other significant topographic features including knolls, ridge tops, saddles, treelines, significant stands of trees, and natural vegetation

which damage the integrity of hillside areas, in order to provide off-site views.

Strategy 6.3: Develop and maintain standards and regulations that retain native vegetation and that protect the “view shed” both from and to hillsides.

The Project site is within a flat built out portion of the City and not in a hillside area. Therefore, the proposed Project would not affect any scenic vistas of hillsides.

As such, impacts would be less than significant.

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

The only roadway within or adjacent to South Pasadena is that identified in the California Scenic Highways Program is Arroyo Seco Parkway (Interstate 110), which has been designated a historic parkway by Caltrans in 2015.¹ Arroyo Seco parkway is approximately 0.25 miles away from the Project site. In addition, according to the City’s General Plan, no officially designated state scenic routes or highways occur near the Project site. As such, no impact would occur.

Threshold: In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).

The Project site currently consists of three buildings. The proposed Project would retain the two-story portion of the building that faces Mission Street, remove two-thirds of the existing one-story warehouse to the rear of the same building and construct a maximum 32-foot-high two story multifamily residential and commercial mixed use building on this portion of the Project site incorporating the rehabilitated two story building retained facing Mission Street. The remaining two existing buildings would be demolished, and an up to 40-foot high three-story multi-family residential and commercial mixed-use building would be constructed. The Proposed Project would consist of 7,394 square feet of commercial space along the Mission Street and Fairview Avenue frontages and 36 residential units on the upper levels and in the interior of the site comprising 33,281square feet.

¹ California Department of Transportation, “District 7 Projects,” accessed March 2019, <http://www.dot.ca.gov/dist07/travel/projects/details.php?id=6>

The Project site lies along the south side of Mission Street and is located within South Pasadena's General Plan designated Mission West Historic Business District, which defines the aesthetic character of the area. The historic district comprises the City's commercial core and includes commercial buildings located along Mission Street, the former South Pasadena Bank at the southwest corner of El Centro Street and Diamond Avenue, the South Pasadena Public Library, and a variety of other resources including the Meridian Iron Works, a watering trough and wayside station.

Land use surrounding the site includes one- and two-story commercial buildings along Mission Street, many of which are historic, ground-floor storefronts and dining patios facing the sidewalk: Le Car, a one-story foreign and domestic auto dealer is to the east of the Project site; Mission Wines, a two-story commercial building is located directly north of the Project site, Collins Collins Muir + Stewart LLC, a two-story law firm is located to the south of the Project site; and the one story South Pasadena Unified School District and parking lot is located to the west of the Project site.

While the proposed buildings are larger in height and mass than most of the surrounding buildings, they are not out of scale or character for the Mission Street area. This is demonstrated by the fact that several three-story buildings already exist in the area, including the Golden Oaks apartment building, a mixed-use building fronting on Fairview Avenue, the Mission Meridian Village, and a mixed-use building at the corner of Mission Street and Fremont Avenue. Furthermore, the proposed façade along Mission Street would be divided into multiple storefront and pedestrian openings, creating a rhythm that is consistent with other existing buildings along Mission Street.

In terms of uses, the mixed residential and commercial nature of the proposed buildings is consistent with the surrounding area, which contains a mix of commercial, residential, and institutional uses, with commercial uses primarily occurring at the ground-floor level along Mission Street. The Project is consistent with this arrangement, with commercial and residential uses and facades at the ground level along Mission Street.

Given that the Project's architectural style designed with brick is consistent with the surrounding area, the scale of the proposed buildings is similar to other existing buildings in the area, and the proposed mixed-use nature of the Project is consistent with surrounding the Mission West Historic Business District, the proposed Project would not substantially degrade the existing visual character or quality of the site or its surroundings. As such, impacts would be less than significant.

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

The Project site and its surroundings are currently urbanized and contain various forms of on-and off-site lighting. The proposed Project would introduce additional light sources in the form of security lighting, landscape, building accent lighting, and vehicle lighting. The proposed courtyard would also include safety lighting and pedestrian light standards. Building accent lighting is also proposed along the Mission Street frontage. The proposed type and intensity of lighting would be a slight increase over existing lighting but would be consistent with surrounding lighting along Mission Street. In addition, the proposed Project lighting is required to comply with the City's Municipal Code Section 36.300.090, which requires that all outdoor lighting be "shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site and shall be directed downward and away from adjoining properties and public rights-of-way." With the required compliance with the outdoor lighting standards in the Municipal Code, the proposed Project would not create a new source of substantial light that would adversely affect day or nighttime views of the area. As such, impacts regarding lighting would be considered less than significant.

The proposed Project has the potential to create glare from windows installed in the proposed buildings, including from the proposed storefront windows along Mission Street. However, the City's Municipal Code Section 36.300.110 requires that glare be shielded to prevent emission of glare beyond the property line. With the compliance of the Project with this performance standard of the Municipal Code, the proposed Project would not create a new source of substantial glare, which would adversely affect day or nighttime views in the area. As such, impacts regarding glare would be considered less than significant.

AGRICULTURE AND FORESTRY RESOURCES

Threshold: 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.

The site and surrounding area are characterized by features typical of the urban landscape and include retail-commercial and residential uses. No farmland, agricultural land, or related operations are found in the area or on the Project site. The maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency do not indicate any farmland on or in close proximity to the Project site. Implementation of the Project would not involve changes that could result in conversion of farmland to nonagricultural uses because no agricultural uses or farmland are near the Project site. Therefore, no conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use would occur. As such, no impacts would occur.

Threshold: Conflict with existing zoning for agricultural use or a Williamson Act contract.

As previously noted, the Project Site and surrounding development are fully developed and are not currently used for agricultural uses. The Project Site is not designated or zoned for agricultural use, used for agriculture, or subject to a Williamson Act contract. Therefore, the proposed Project would not conflict with any uses zoned for agricultural uses or subject to any Williamson Act contracts. As such, no impacts would occur.

Threshold: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

As defined by the Public Resources Code (PRC) Section 12220(g), forestland is land that can support 10 percent native tree cover of any species under natural conditions and that allows for management of one or more forest resources. Given that minimal vegetative cover is found on the Project Site and the site is not zoned as forestland, the proposed Project would not affect any forestlands as defined by the PRC.

A Timberland Production Zone is defined by the Government Code Section 51104(g) as an area that is zoned for the sole purpose of growing and harvesting timber. Because the Project Site does not contain any timber resources, nor is it zoned as a timberland or timberland production area, the proposed Project would not conflict with timberland or Timberland Production areas. As such, no impacts would occur.

Threshold: **Result in the loss of forest land or conversion of forest land to non-forest use.**

The Project Site is located in an urbanized area of the City and is not zoned or designated for forest or timberland, nor is it used for forestry operations. Therefore, it would not result in the loss of forestland or result in the conversion of forestland to non-forest uses. As such, no impacts would occur.

Threshold: **Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.**

As previously noted, the Project Site does not contain any farmland or forestland. Development of the proposed Project would occur on the same site that currently contains the existing buildings for Amy's Playground, La Fiesta Restaurant, and a commercial gymnasium and which is adjacent to urban uses, which are located in a disturbed and developed area. As such, the proposed Project would not result in the loss of Farmland or forestland or the conversion of Farmland or forestland to non-forest uses. As such, no impacts would occur.

BIOLOGICAL RESOURCES

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

Much of the local area, including the Project site, has been developed or landscaped and supports largely nonnative plant communities and species. Therefore, only a limited number of plant species, which flourish in urban environments, can be found, none of which are considered Rare or Endangered. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist on the Project site or within the surrounding area, and no species were observed in the vicinity. Consequently, impacts would be less than significant. As such, impacts would be less than significant.

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

The Project Site is not located in a riparian or wetland habitat.² The nearest wetland is located approximately 0.88 miles away at Arroyo Seco, and the nearest riparian habitat is located approximately 0.75 miles away at the Arroyo Park. The majority of the local area, including the Project site, has been developed or landscaped and supports largely nonnative plant communities and species. Therefore, only a limited number of plant species, which flourish in urban environments, can be found, none of which are considered Rare or Endangered. Suitable habitat for sensitive mammal, reptile, amphibian, or fish species does not exist on the Project site or within the surrounding area, and no species were observed in the vicinity. As such, impacts would be less than significant.

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

As mentioned previously, the Project site is not located on federally protected wetlands.³ The nearest wetland is located approximately 0.88 miles away at Arroyo Seco. Implementation of the proposed Project would avoid excavation or disturbance of Arroyo Seco. As such, the proposed Project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. As such, impacts would be less than significant.

Threshold: 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.

Development of the Project The local area consists of established, highly urbanized, and developed properties. The Project site and the immediate area are almost entirely paved or otherwise developed, and do not contain native resident or migratory species or native nursery sites. In addition, there are no wildlife migration corridors in the Project area. No impact related to the movement of fish or wildlife

2 United States Fish and Wildlife Service, *National Wetlands Inventory*, ver. 2, accessed November 2017, <https://www.fws.gov/wetlands/data/mapper.HTML>.

3 United States Fish and Wildlife Service, *National Wetlands Inventory*, ver. 2, accessed November 2017, <https://www.fws.gov/wetlands/data/mapper.HTML>.

species or migration corridors would result from implementation of the Project. As such, impacts would be less than significant.

Threshold: **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.**

Chapter 34, Trees and Shrubs, of the SPMC contains guidelines for the protection and removal of trees. These trees are defined as heritage trees (as established by the South Pasadena Planning & Building Department), native species (including California Walnut, Sycamore, Christmas Berry, Blue Elderberry, and Mexican Elderberry), and trees that are 12 inches or more in diameter. Trees on the Project site are ornamental types and include such species as palm and eucalyptus. No conflict with local policies or ordinance protecting biological resources would occur with implementation of the Project. As such, impacts would be less than significant.

Threshold: **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.**

The Project Site is not located within an area covered by any adopted Habitat Conservation Plans, Natural Community Conservation Plans, or any other approved local, regional, or State habitat conservation plans.⁴ As such, implementation of the proposed Project would not conflict with any provisions related to such plans. As such, no impacts would occur.

GEOLOGY AND SOILS

Threshold: **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?**

A Geotechnical Engineering Report was conducted by Terracon Consultants, Inc. on July 2, 2018, it is included as **Appendix G** of this Draft EIR. The Project Site is located within the City of South Pasadena of Los Angeles County. As provided in the Geotechnical Report, the type and magnitude of seismic hazards

4 California Department of Fish and Wildlife, "NCCP Plan Summaries," accessed April 2018, <https://www.wildlife.ca.gov/conservation/planning/nccp/plans>.

affecting the site are dependent on the distance to causative faults, the intensity, and the magnitude of the seismic event. As calculated using the UCSG United Hazard Tool, the Elysian Park Fault is considered to have the most significant effect at the site from a design standpoint. The fault is located approximately 4 miles from the Project site and has a maximum credible earthquake magnitude of 6.5.⁵ The Project Site does not contain an active or potentially active earthquake fault and is not within the boundaries of any special studies zone, such as the State of California Earthquake Fault Zone (formerly known as the Alquist-Priolo Special Studies Zone). While the Project Site is not located within a special studies zone, the site is located in a seismically active area, as is the majority of Southern California. However, the proposed Project would be built in accordance with State building code, which would include the incorporation of seismic standards appropriate to the Project Site and its seismic design category. As such, impacts would be less than significant.

Threshold: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

As with any site in the Southern California region, the Project site is susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby active faults include the Hollywood, Santa Monica, Newport-Inglewood, and Upper Elysian Blind Thrust Faults. These faults can produce strong seismic ground shaking at the Project site. On-site structures would be required to be constructed to comply with the California Building Code (CBC). With adherence to the CBC, design and construction of the proposed development would be engineered to withstand the expected ground acceleration that may occur at the Project site. The calculated design base ground motion for the site consider the soil type, potential for liquefaction, and most current and applicable seismic attenuation methods available. In addition, Project construction would be subject to review and approval by City building and safety officials. As such, impacts would be less than significant.

Threshold: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

As stated previously, A Geotechnical Engineering Report was conducted on July 2, 2018 included in **Appendix G** of this Draft EIR. Based on the results of the borings, subsurface conditions encountered on the Project site generally consist of predominantly medium dense to very dense sand with variable amounts of silt and clay to the maximum depth explored at 92 feet below ground surface. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected

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to intense ground shaking during earthquakes. Liquefaction is generally known to occur in saturated or near-saturated cohesionless soils at depths shallower than about 50 feet. Groundwater was not encountered in the field exploratory borings and is believed to be at least 100 feet below grade. Therefore, liquefaction potential at the site is considered minimal, and dynamic settlement of the on-site soils is anticipated to be negligible. As such, impacts would be less than significant.

Threshold: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The topography of the Project site and its immediate built-out environment is relatively flat and, thus, devoid of any distinctive landforms. No known landslides have occurred near the Project site, nor is the Project site in the path of any known or potential landslides. As such, impacts would be less than significant.

Threshold: Result in substantial soil erosion or the loss of topsoil.

Erosion is the movement of rock fragments and soil from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. The Project Site and surrounding areas are urbanized and relatively flat, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site.

Construction activities associated with the proposed Project may result in wind- and water-driven erosion of soils due to grading activities if soil is stockpiled or exposed during construction. This impact is considered short-term in nature because the site would expose small amounts of soil only during construction activities. Any potential erosion impacts would be reduced by implementation of stringent erosion controls imposed by the City through grading permit regulations. The Project would also be required to adhere to SCAQMD Rule 403—Fugitive Dust, which would further reduce the impact related to soil erosion to less than significant.

Runoff would be captured through the planters and other water-retention features associated with the proposed Project to convey stormwater runoff on site to surrounding storm drains. As a result, the proposed Project would not require any substantial changes to the existing drainage pattern of the Project Site or the area that would cause substantial erosion or loss of topsoil. As such, impacts would be less than significant.

Threshold: 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.

The Project Site is located within the City of South Pasadena of Los Angeles County. As provided in the Geotechnical Report (**Appendix G**), the type and magnitude of seismic hazards affecting the site are dependent on the distance to causative faults, the intensity, and the magnitude of the seismic event. As calculated using the UCSG United Hazard Tool, the Elysian Park Fault is considered to have the most significant effect at the site from a design standpoint. The fault is located approximately 4 miles from the Project site and has a maximum credible earthquake magnitude of 6.5.⁶ The Project Site does not contain an active or potentially active earthquake fault and is not within the boundaries of any special studies zone, such as the State of California Earthquake Fault Zone (formerly known as the Alquist-Priolo Special Studies Zone). While the Project Site is not located within a special studies zone, the site is located in a seismically active area, as is the majority of Southern California. However, the proposed Project would be built in accordance with State building code, which would include the incorporation of seismic standards appropriate to the Project Site and its seismic design category. As such, impacts would be less than significant.

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

The Project Site has previously been mass graded/compacted and developed with commercial and restaurant buildings, as well as the associated parking areas. Expansive soils are surface deposits rich in clays that expand when wet and shrink when dried. When these soils swell, the change in volume can exert detrimental stresses on buildings and cause structural damage. As indicated in the Geotechnical Report (**Appendix G**), the soils underlying the Project Site are considered to have a low expansion potential. To minimize damage due to geologic hazards, design and construction of the Proposed Project would comply with applicable building codes and would adhere to the design recommendations presented within the Geotechnical Report. As such, impacts related to expansive soil would be less than significant.

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Threshold: 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.

Implementation of the proposed Project would continue to utilize the existing wastewater infrastructure that serves the Project Site and would not use septic tanks or alternative wastewater disposal systems. As such, no impacts would occur.

Threshold: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The Project Site is located within the City of South Pasadena of Los Angeles County. As provided in the Geotechnical Report (**Appendix G**), the Elysian Park Fault is considered to have the most significant effect at the site from a design standpoint. The fault is located approximately 4 miles from the Project site. The Project Site does not contain an active or potentially active earthquake fault and is not within the boundaries of any special studies zone, such as the State of California Earthquake Fault Zone (formerly known as the Alquist-Priolo Special Studies Zone). While the Project Site is not located within a special studies zone, the site is located in a seismically active area, as is the majority of Southern California. However, the proposed Project would be built in accordance with State building code, which would include the incorporation of seismic standards appropriate to the Project Site and its seismic design category. As such, impacts would be less than significant.

GREENHOUSE GAS EMISSIONS

Threshold: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature.

There are no federal, State, or local adopted thresholds of significance for addressing an institutional project's GHG emissions. The California Air Pollution Control Officers Association suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional or State agency.

Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of GHG emissions resulting from the Project; (2) a qualitative analysis or performance-based standards; (3) a quantification of the extent to which the Project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The proposed Project would result in short-term emissions of GHGs during construction. Site- or Project-specific data were used in the CalEEMod model where available. Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include construction related GHG emissions when assessing the long-term GHG emissions associated with a project. Current practice is to annualize construction related GHG emissions over a project's lifetime in order to include these emissions as part of a project's annualized lifetime total emissions so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. A project lifetime has generally been defined as 30 years; therefore, the proposed Project's estimated construction GHG emissions have been annualized over a 30-year period and are included in the annualized operational GHG emissions.

Area source emissions would be generated by the consumption of natural gas for space and water heating devices. The proposed Project would also result in GHG emissions due to area source emissions from natural gas, electricity demand, water consumption, and solid waste generation.

The annual net GHG emissions associated with the construction and operation of the Project are provided in **Table 6.0-1: Estimated Greenhouse Gas Emissions**. As shown in **Table 6.0-1** below, the net total increase in emissions is 257 MTCO₂e per year, well below the recommended SCAQMD screening threshold of 3,000 MTCO₂e. Therefore, construction and operation of the proposed Project would not result in any significant increase in GHG emissions.

Table 6.0-1
Estimated Greenhouse Gas Emissions

GHG Emissions Source	Emissions (MTCO ₂ e/year)
Construction (amortized)	19
Operational (mobile) sources*	516
Area sources	8
Energy	190
Waste	12

GHG Emissions Source	Emissions (MTCO ₂ e/year)
Water	22
Annual Total	767
<i>Existing</i>	510
Net Total	257

Source: CalEEMod

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

MTCO₂e = metric tons of carbon dioxide emissions.

Refer to **Appendix A.4 (Proposed Annual)**, Section 2.2 Overall Operational.

Threshold: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

AB 32, the California Global Warming Solutions Act of 2006, focuses on reducing GHG emissions in California. GHGs, as defined under AB 32, include carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In November 2017, CARB adopted an updated Climate Change Scoping Plan, which details strategies to meet that goal. The Climate Change Scoping Plan also recommends energy-efficiency measures in buildings such as maximizing the use of energy efficient appliances and solar water heating, as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes. In addition, the Climate Change Scoping Plan encourages the use of solar photovoltaic panels and other renewable sources of energy to provide clean energy and reduce fossil fuel-based energy.

The proposed Project would be designed in accordance with the 2016 Title 24 Energy Efficiency Standards, which represent an approximate improvement of 30 percent beyond the 2008 Standards that were used in assumptions for the City's 2013 CAP GHG analysis. Conformance with the 2016 Standards is consistent with the City's objectives to reduce GHG emissions to meet regional and Statewide emission reduction targets. Therefore, the proposed Project does not interfere with the State's implementation of (i) Executive Order B-30-15 and Senate Bill 32's target of reducing Statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing Statewide GHG emissions to 80 percent below 1990 levels by 2050 because it does not interfere with the State's implementation of GHG reduction plans described in the CARB's updated Scoping Plan.

Therefore, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

HAZARDS AND HAZARDOUS MATERIALS

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

The proposed Project involves the operation of a new mixed-use building consisting of residential and commercial uses. The types and amounts of hazardous materials that would be used during operation of the Project would be typical of those in a mixed-use project (e.g., cleaning solvents, pesticides for landscaping, painting supplies). Construction of the proposed Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations. Additionally, the South Pasadena Fire Department (SPFD) would have the authority to perform inspections and enforce federal and State laws governing the storage, use, transport, and disposal of hazardous materials and wastes.⁷ The proposed Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials. As such, impacts would be less than significant.

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

As discussed above, compliance with federal, state, and local laws and regulations relation to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials.

As discussed above, operation of the Project would use limited quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning agents and paints. Although it does not propose any industrial uses, the Project would involve uses that typically do not generate large quantities of hazardous materials or wastes; moreover, these materials present a low risk for hazards exposure. Additionally, as with Project construction, all hazardous materials and/or waste on the Project site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, state, and local requirements, such as those administered by the LACFD and the Occupational Safety and Health Administration. Therefore, with implementation of appropriate hazardous materials management protocols on the Project site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of

7 City of South Pasadena, "Safety and Noise Element," accessed February 2019, <http://www.southpasadenaca.gov/home/showdocument?id=213>

hazardous materials, as well as adherence to manufacturer's instructions for the safe handling and disposal of hazardous materials, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As such, impacts associated with the use, storage, handling, and disposal would be less than significant.

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

The closest school to the Project site is the Colonial House Preschool, located just 275 feet away at 1124 Mission Street. As discussed above, construction of the Project would involve the use of those hazardous materials that are typically necessary for construction of a mixed-use building containing residential and commercial uses. As such, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. In addition, construction of the Project would involve the demolition of a majority of the existing structures. The removal of any asbestos-containing materials would be required to comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities) and Cal/OSHA regulations regarding lead-based paint. Thus, construction activities associated with the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. As such, impacts would be less than significant.

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

As noted earlier, a Geotechnical Engineering Report was conducted for the Project site by Terracon Consultants, Inc., in July 2018, as included in **Appendix G** of this Draft EIR. The Geotechnical Engineering Report was conducted in general accordance with ASTM Standard Practice E 1527-13 and the United States Environmental Protection Agency (USEPA) All Appropriate Inquiries Standard. The Geotechnical Engineering Report did not identify any relevant regarding the presence of underground storage tanks (USTs) or monitoring wells on the Project Site. The Project Site is not included on a list of hazardous materials sites. The Geotechnical Engineering Report concluded that there are no recognized RECs, HRECs, CRECs connected to the Project Site. Impacts would be less than significant.

Threshold: 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, result in a safety hazard for people residing or working in the project area?

The Project site is not located within 2 miles of a public airport. The closest airport is the San Gabriel Airport located in El Monte approximately 7.32 miles east of the Project site. Given the distance between the San Gabriel Airport and the Project site, the Project would not be impacted by a safety hazard or excessive noise. As such, there would be no impacts.

Threshold: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The Proposed Project will be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, ensuring that adequate emergency access and evacuation will be provided.

Construction of the Project may require temporary and/or partial street closures on Mission Street due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. However, the construction contractor would be required to notify the SPPD and SPFD if construction activities would impede movement for first emergency response vehicles. The Project Applicant would also be required to develop an emergency response plan in consultation with the SPFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire stations. Implementation of these requirements would be incorporated as a typical condition of approval. As such, impacts would be less than significant.

Threshold: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The Project area is not located in a designated wildland area that may contain substantial forest fire risks or hazards. In addition, the City does not identify the Project Site to be located within a City-designated Fire Hazard Area.⁸ The Proposed Project would not result in impacts related to exposing people or structures to adverse effects from wildfires. As such, no impact would occur.

8 CalFire "Very High Fire Hazard Severity Zones in LRA," http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf

HYDROLOGY AND WATER QUALITY

Threshold: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Construction Impacts

During construction and demolition activities stormwater runoff from the Project site could cause erosion and/or transport sediment off site and into municipal storm drain systems. Thus, pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could result in adverse impacts to water quality. Construction activity would be required to comply with SPMC Chapter 23: Stormwater and Urban Runoff Pollution Control. This section requires stormwater runoff containing sediment, construction materials or other pollutants from a construction site to be reduced to the maximum extent practicable. As required under the NPDES, the proposed Project would have to comply with the Multiple Separate Storm Sewer System (MS4) Permit issued by the Los Angeles RWQCB, which would require implementation of BMPs to mitigate the effects of erosion and inherent potential for sedimentation and other pollutants entering the stormwater system by retaining, treating, or infiltrating polluted runoff on site. Implementation of the MS4 and compliance with the NPDES and City discharge requirements would ensure that construction of the proposed Project would not violate any water quality standards and/or discharge requirements, or otherwise substantially degrade water quality.

Operation Impacts

Operation of the proposed Project would introduce sources of potential stormwater pollution that are typical of commercial and residential uses. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with SPMC Chapter 23: Stormwater and Urban Runoff Pollution Control.

The proposed Project would generate wastewater that would be conveyed via municipal sewage infrastructure maintained by the City of Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP), a public facility subject to the state's wastewater treatment requirements. The proposed Project would generate wastewater similar to that generated by existing mixed-use buildings throughout the City. The proposed Project would be subject to the Water and Sewer Impact fee as detailed in the SPMC Chapter 16B. The purpose of the fee is to mitigate unfavorable impacts on the City's water and sanitary sewer systems attributed to new development.

Compliance with existing regulations, such as the MS4, including the implementation of BMPs, would ensure that operation of the proposed Project would not violate any water quality standards or waste

discharge requirements. Construction and operation of the proposed Project would not violate any water quality standards or waste discharge requirements. As such, impacts would be less than significant.

Threshold: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

The Project site currently consists of three buildings and primarily consists of impervious surfaces, with limited landscaping characterized by ornamental trees and shrubs. Implementation of the proposed Project would not result in a substantial change in the amount of pervious and impervious surface across the Project site nor would it impede sustainable groundwater management of the basin. Groundwater was not encountered in the test borings up to 92 bgs. Based on the County of Los Angeles, Department of Public Works groundwater data, the groundwater level in the Project vicinity ranges between 94.3 and 123.8 feet bgs between 1980 and 2007.⁹ Similar to existing conditions, redevelopment of the Project site would result in a negligible amount of on-site groundwater recharge opportunities and would not impact groundwater wells, change the rate or direction of flow of groundwater, impact groundwater recharge areas, or impede sustainable groundwater management of the basin. While the proposed Project involves the construction of a 2-level subterranean parking garage at a depth of approximately 20 feet, these excavation activities are not likely to interfere with the groundwater table. As such, Impacts would be less than significant.

Threshold: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site.

The Project site is located in a highly urbanized area. There are no natural watercourses on the Project site or in the vicinity. As discussed above, the Project site is developed with paved surfaces, and current stormwater runoff flows to the local storm drain system. As such, the proposed Project would not result in a substantial alteration to the existing drainage pattern or to any drainage course; therefore, no erosion or siltation impacts related to such alterations would occur. As such, impacts would be less than significant.

⁹ County of Los Angeles, Department of Public Works, groundwater monitoring well No 4067FF. The well is located about 6,940 feet northwest of the Project site.

Threshold: **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.**

The proposed Project would not result in substantial alteration of existing drainage patterns or any alterations to a drainage course, river, or stream. Grading and construction activities on the Project site may temporarily alter the existing drainage patterns of the site and reduce off-site flows. However, construction and operation of the proposed Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on or off site. As such, impacts would be less than significant.

Threshold: **Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.**

The proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project site currently is and would continue to be collected on the site and directed toward existing storm drains having adequate capacity in the Project vicinity. The proposed Project is required to implement BMPs, such as use of flow-through planter boxes, vegetative swales, semi pervious surfaces, or infiltration trenches, to retain runoff. The proposed Project includes approximately 10,375 square feet of common open space, including a residential courtyard and landscaped common areas and decks, that would capture and filter a portion of runoff from the Project site. As such, impacts would be less than significant.

Threshold: **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 impede or redirect flood flows.**

As stated previously, the proposed Project would not substantially alter the existing on-site drainage pattern of the Project site. Development of the proposed Project would not substantially change the existing impervious surfaces on site and would not result in substantial drainage pattern changes or result in an increase in surface runoff. Further, the proposed landscaping features are designed to reduce runoff, and it is expected that implementation of the proposed Project would result in a reduced rate and volume of runoff from existing conditions.

Additionally, the proposed Project is not located in a 100-year flood hazard area, as such it would not impede or redirect flood flows.¹⁰ The proposed Project would not be subject to flooding. As such, no impact would occur.

Threshold: In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Due to the distance of the Project site from the Pacific Ocean, which is located approximately 20 miles to the southwest, virtually no risk of on-site hazard due to tsunamis (seismically induced waves) exists. No enclosed water bodies exist near the Project site that could place the site at risk from inundation due to a seiche (large waves that occur within a land-locked water body, such as a lake or a reservoir. The Project site is relatively flat and is surrounded by urban development. Therefore, the risk of mudflows is considered low. As such, impacts would be less than significant.

Threshold: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Construction of the proposed Project, such as grading and trenching activities, could potentially degrade water quality through erosion and subsequent sedimentation. However, the proposed Project would implement BMPs and comply with all federal, State, and local regulations governing stormwater discharge. In addition, the proposed Project would incorporate landscaping throughout the project and other water-retention features to convey stormwater runoff on site to surrounding storm drains. As such, the proposed Project would not include potential sources of contaminants that could potentially degrade water quality.

MINERAL RESOURCES

Threshold: 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.

According to the City, the State Division of Mines and Geology has not designated any lands in South Pasadena as a classified mineral resource deposit area.¹¹ As such, it is unlikely that the Project Site and surrounding areas contain any mineral resources of significance. The proposed Project would be implemented in a developed urban area of the City and would not disrupt any mining operations. As such, no impacts would occur.

10 Federal Emergency Management Agency, "FEMA Floor Map Service Center" accessed April 2019, <https://msc.fema.gov/portal/search#searchresultsanchor>.

11 City of South Pasadena, General Plan, "Open Space & Resource Conservation Element."

Threshold: **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.**

As noted above, the Project site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. The Project site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts would occur.

POPULATION AND HOUSING

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

In October 2008, SCAG approved and adopted the 2008 Regional Comprehensive Plan (RCP) for the SCAG Region—Helping Communities Achieve a Sustainable Future.¹² The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region’s land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP was intended to serve as an advisory document for local agencies in the SCAG region. The following principles are based on the region’s adopted Compass Growth Vision Principles for Sustaining a Livable Region:

- Improve mobility for all residents. Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.
- Foster livability in all communities. Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.
- Enable prosperity for all people. Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.
- Promote sustainability for future generations. Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

In April 2012, SCAG adopted the Regional Transportation Plan 2012-2035 Sustainable Communities Strategy (RTP/SCS).¹³ As a designated Metropolitan Planning Organization (MPO) under federal law, SCAG is responsible for developing and adopting a long-range RTP every four years. The plan evolved out of a massive outreach undertaking involving a broad range of stakeholders across the region to update the shared vision for the region’s sustainable future. The RTP/SCS includes a strong commitment to reduce

12 Southern California Association of Governments, 2008 Regional Comprehensive Plan.

13 Southern California Association of Governments (SCAG), Regional Transportation Plan 2012-2035 Sustainable Communities Strategy, adopted April 2012.

emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards set forth by the federal Clean Air Act. The RTP/SCS focuses on the interconnected components of economic, social, and transportation investments required to achieve a sustainable regional multimodal transportation system. The goals and policies of the RTP/SCS require the participation of individual municipalities and multilevel investment of stakeholders throughout the region.

The Project site currently consists of three buildings. The proposed Project would retain the two-story portion of the building that faces Mission Street, remove two-thirds of the existing one-story warehouse to the rear of the same building and construct a maximum 32-foot-high two story multifamily residential and commercial mixed use building on this portion of the Project site incorporating the rehabilitated two-story building retained facing Mission Street. The remaining two existing buildings would be demolished, and an up to 40-foot high three-story multi-family residential and commercial mixed-use building would be constructed. The Proposed Project would consist of 7,394 square feet of commercial space along the Mission Street and Fairview Avenue frontages and 36 residential units on the upper levels and in the interior of the site comprising 33,281square feet.

The Project site is zoned for the proposed uses and the existing infrastructure supports this level of development. According to the South Pasadena General Plan, the average household size for occupied units is 2.46. As such, the construction of 36 residential units would result in an estimated 89 new residents in the City of South Pasadena. The 2010 Census shows that the total population of the City was 25,619 people.¹⁴ An increase of 89 residents to the City would not represent a significant growth in population. Furthermore, the increase in residential population on the site is consistent with the build out projections of the City's General Plan. As such, the Project would not cause unexpected growth (i.e., new housing or employment generators). The Project would not accelerate development in an undeveloped area that exceeds growth projections that would result in an adverse physical change in the environment or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. The Project would be consistent with the goals and strategies of SCAG's Regional Comprehensive Plan, the Compass Growth Vision Strategy, and the 2012 RTP/SCS. As such, impacts would be less than significant.

14 City of South Pasadena, General Plan, "Housing Element."

Threshold: **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.**

As mentioned previously, the Project consists of the partial demolition of one existing building and total demolition of the remaining buildings on the site and the construction of new two-and three story 36-unit mixed-use residential and commercial buildings. Construction of the proposed Project would not result in the displacement of substantial numbers of existing people and housing, but rather create new housing opportunities within the City. As such, there would be no impacts.

No impacts would occur.

PUBLIC SERVICES

Threshold: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.**

Fire protection and emergency medical services in the City of South Pasadena are provided by the South Pasadena Fire Department (SPFD). The nearest fire station to the Project Site is located at 817 Mound Avenue, approximately 0.18 miles northeast of the Project Site. The Project site currently consists of three buildings. The proposed Project would retain the two-story portion of the building that faces Mission Street, remove two-thirds of the existing one-story warehouse to the rear, and build an up to 32-foot two-story multi-family residential/commercial mixed use building on this portion of the site and demolish two existing buildings and construct an up to 40 foot high three story residential/commercial mixed use building on the remainder of the parcel. The Proposed Project would consist of 7,394 square feet of commercial space along the Mission Street and Fairview Avenue frontages and 36 residential units on the upper levels and in the interior of the site comprising 33,281square feet.

As described previously, the 89 residents generated by the proposed Project would be within the growth projections contained in SCAG's 2016–2040 RTP/SCS. Therefore, the proposed Project would not place an unanticipated burden on fire protection services. The proposed Project would be required to adhere to all Fire Code requirements. With adherence to existing regulations, the proposed Project would not result in the need for new or expanded fire facilities. As such, impacts would be less than significant.

Threshold: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.**

Police protection services in the City of South Pasadena are provided by South Pasadena Police Department (SPPD), located at 1422 Mission Street, approximately 0.14 miles northeast of the Project site, adjacent to South Pasadena City Hall. Police protection services include emergency and nonemergency police response, routine police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement. The Project site currently consists of three buildings. The proposed Project would retain the two-story portion of one building that faces Mission Street, remove two-thirds of the existing one-story warehouse to the rear, and build a two-story multi-family residential/commercial building on this portion of the site, and demolish the remaining two buildings and construct a three-story residential/commercial mixed use building on the remainder of the parcel. In addition, as described under the **Population and Housing** section, the proposed Project would be within the growth projections contained in the City's General Plan and SCAG's 2016–2040 RTP/SCS. Therefore, the proposed Project would not place an unanticipated burden on police protection services. As such, impacts are less than significant.

Threshold: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools.**

The South Pasadena Unified School District (SPUSD) provides public school services to City residents for grades kindergarten through 12. The Project site is served by the following SPUSD schools: Arroyo Vista Elementary located at 335 El Centro Street; Marengo Elementary located at 1400 Marengo Avenue; Monterey Hills Elementary located at 1624 Via Del Rey; South Pasadena Middle School located at 1500 Fair Oaks Avenue; and South Pasadena High School located at 1401 Fremont Avenue.

The proposed Project would include 36 residential units that would generate approximately 89 residents into the City. The proposed Project would not result in a significant increase in demand for school services. As such, impacts would be less than significant.

Threshold: **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks.**

The proposed Project would include 36 residential units that would generate approximately 89 residents into the City. This increase in residential population would contribute incrementally toward impacts to the demand for the City's existing parks and recreational facilities. The proposed Project would incrementally increase the use of and demand for parks and recreational facilities. The proposed Project would include public and resident courtyards, as well as private balconies for select units. Additionally, the Project will provide green roofs over the roof deck drains. In total, the open space area provided is 11,686 square feet.

Moreover, any additional demand would be met through payment of Quimby Act and public open space development fees for new residential and nonresidential fees in accordance with the Open Space and Resource Conservation Element of the General Plan. These fees are intended to be used for the acquisition, improvement, and expansion of public parks and/or recreational facilities. As such, impacts would be less than significant.

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

The proposed Project result in an incremental population increase of approximately 89 residents, which would be within growth projections for the City. Therefore, the proposed Project would not substantially increase demand for public facilities and services, including libraries and City administrative services, that would require the construction of new or expanded facilities. As such, impacts would be less than significant.

RECREATION

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

The City contains six parks with a total acreage of 92.2 acres.¹⁵ The Project site currently consists of three buildings. The proposed Project would retain the two-story portion of a building that faces Mission Street, remove two-thirds of the existing one-story warehouse to the rear, and build a two-story multi-family residential building on this portion of the Project site. The remaining two existing buildings would be demolished, and a new three story residential/commercial mixed-use building would be constructed on the remainder of the Project site. Construction and operation of the proposed Project would not remove and/or demolish any existing neighborhood or regional parks and/or recreational facilities. The proposed Project would incrementally increase the use of and demand for parks and recreational facilities. However, drought-tolerant and ornamental landscaping with high-efficiency irrigation features would be placed throughout the Project site to provide shading opportunities and erosion control. The proposed Project would include public and resident courtyards, as well as private balconies for select units. Additionally, the Project will provide green roofs over the roof deck drains. In total, the open space area provided is 11,686 square feet.

In addition, while the proposed Project would have the potential to increase the use of park and recreational facilities, it would not do so to the extent that parks would undergo substantial physical deterioration or require the need for expansion. Furthermore, the Project applicant would be required to pay Quimby Act and public open space development fees in accordance with the Open Space and Resource Conservation Element of the General Plan, which would be used by the City to acquire parkland as it becomes available and/or to expand and maintain existing recreational facilities.¹⁶ Payment of required these development impact fees would reduce any demand on park and recreational facilities. As such, impacts would be less than significant.

Threshold: **Would the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.**

As mentioned previously, the proposed Project would contain open space amenities for residents, including public and resident courtyards, as well as private balconies for select units. Additionally, the

¹⁵ City of South Pasadena, General Plan, "Open Space and Resource Conservation Element"

¹⁶ City of South Pasadena, General Plan, "Open Space and Resource Conservation Element"

Project will provide green roofs over the roof deck drains. All recreational facilities associated with the proposed Project would be developed on site and are evaluated as part of the proposed Project. As described above, the proposed Project would contribute to an incremental increase on the City's recreational facilities and would not result in the construction of new or the expansion of existing facilities. As such, impacts would be less than significant.

TRANSPORTATION

The following section summarizes and incorporates by reference information from the Traffic Study, dated January 2017, (Traffic Study), prepared by Gibson Transportation Consulting, Inc., for the proposed Project. The Traffic Study is included as **Appendix X** to this Draft EIR. The report analyzes traffic impacts for the anticipated Project opening in 2020.

Threshold: Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The Project site is located at 1001-1115 Mission Street at the southeast corner of Mission Street and Fairview Avenue. Regional access to the Project site will be provided by the Harbor Freeway (SR-110), which is located approximately 0.5 miles north of the Project site. Local street access is provided by Fairview Avenue adjacent to the Project site on the west and from Mission Street adjacent to the Project site on the north.

Local bus service to the Project site is provided along Mission Street. Additionally, there is pedestrian access within public sidewalks along Mission Street connecting the downtown area. On street bicycle access is provided throughout the City. The proposed Project would not conflict with any adopted policies, plans, or programs regarding alternative transportation because no changes to the existing transportation policies, plans, or programs would result from Project implementation.

Based on the 2010 Congestion Management Program for the Los Angeles County (CMP), the City has established the following traffic thresholds of significance to determine whether a Project has a traffic impact at a signalized study intersection or roadway segment and may require mitigation:

- A significant Project-related impact would occur at a signalized study intersection of the addition of Project-generated trips reduces the peak hour LOS of the study intersection from an acceptable operation (LOS A, B, C, or D) to a deficient operation (LOS E or F); or
- A significant Project-related impact would occur at a signalized study intersection already operating at a deficiency (LOS E or F) prior to Project traffic if the addition of Project traffic increases the demand at the intersection by two percent of capacity (volume-to-capacity (V/C) greater or equal to 0.02).

- A significant Project-related impact would occur on a roadway segment if the addition of Project-generated trips reduces the peak hour LOS of the study intersection from an acceptable operation (LOS A, B, C) to a deficient operation (LOS D, E, or F); or
- A significant Project-related impact would occur on a roadway segment already operating at a deficiency (LOS D, E, or F) prior to Project traffic if the addition of Project traffic increases the demand at the intersection by two percent of capacity (V/C greater or equal to 0.02).

The intersection level of service (LOS) rating is based on an intersection's average control delay, expressed in seconds per vehicle, which are found in **Table 6.0-2: LOS Definitions for Intersections**.

Table 6.0-2
LOS Definitions for Intersections

LOS	Description	Signalized V/C ratio
A	Excellent. No vehicle waits longer than one red light and no approach phase is fully used.	0.000–0.600
B	Very good. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.601–0.700
C	Good. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	0.701–0.800
D	Fair. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.801–0.900
E	Poor. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.901–1.000
F	Failure. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	> 1.000

Source: Transportation Research Board Special Report 209, Highway Capacity Manual 2000 (refer to Appendix H).

Estimated Trip Generation

Trip-generation estimates for the Proposed Project were calculated using the trip generation rates contained in *Trip Generation, 9th Edition* (Institute of Transportation Engineers, 2012).¹⁷ **Table 7-3: Trip Generation Estimates**, summarizes the trip generation rates used to arrive at the Proposed Project's trip generation estimates for the daily peak-hour periods.

¹⁷ Institute of Transportation Engineers, Trip Generation Manual, 9th ed., 2012.

**Table 6.0-3
Trip Generation Estimates**

Land Use	AM Peak-Hour Volumes			PM Peak-Hour Volumes			Daily Trips
	In	Out	Total	In	Out	Total	Total
Existing to be removed							
Specialty Retail	25	28	53	22	17	39	341
<i>Transit/Walk-In Reduction (5%)</i>	(1)	(1)	(2)	(1)	(1)	(2)	(17)
High Turnover (Sit-Down) Restaurant	10	9	19	10	7	17	226
<i>Transit/Walk-in Reduction (5%)</i>	(1)	(0)	(1)	(1)	(0)	(1)	(11)
Existing Use Subtotal	9	9	18	9	7	16	215
Proposed Project							
Apartments	4	14	18	14	8	22	239
<i>Transit/Walk-in Reduction (5%)</i>	(0)	(1)	(1)	(1)	(0)	(1)	(12)
Specialty Retail	8	8	16	7	5	12	103
<i>Transit/Walk-in Reduction (5%)</i>	(0)	(0)	(0)	(0)	(0)	(0)	(5)
High Turnover (Sit-Down) Restaurant	13	10	23	13	8	21	272
<i>Transit/Walk-in Reduction (5%)</i>	(1)	(1)	(2)	(1)	(0)	(1)	(14)
Café	16	15	31	7	8	15	143
<i>Transit/Walk-in Reduction (5%)</i>	(1)	(1)	(2)	(0)	(0)	(0)	(7)
Proposed Project Subtotal	719	39	44	83	39	29	68
Net Total Project Trips:	30	35	65	30	22	52	504

Source: Gibson Transportation Consulting, Inc., Traffic Study, January 2017 (refer to Appendix H).

As shown in **Table 6.0-3**, the proposed Project would generate a net total of approximately 504 trip-ends per day with 65 AM peak hour trips (30 in bound trips and 35 outbound trips) and 52 PM peak hour trips (with 30 in bound trips and 22 outbound trips). The Traffic Study analyzed the proposed Project's forecasted traffic impacts, including existing conditions, existing plus Project conditions, opening year (2020) with and without Project conditions, and horizon year (2040) conditions with and without the proposed Project.

Construction Traffic

The proposed Project would require the use of trucks during site clearing and grading and the use of a variety of other construction vehicles throughout the construction of the Proposed Project. The addition of these vehicles into the street system would contribute to increased traffic in the Project vicinity. The haul trips would occur outside of the peak hours and during the permissible hauling hours identified in the haul route to be approved by the City. The proposed Project's construction trip traffic would be less than the operational traffic and would be temporary in nature. Therefore, it is not anticipated that construction of the proposed Project could contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. A construction work site traffic control plan would be submitted to the City for review and approval prior to the start of any construction work. The plan would show the location of any roadways or sidewalk closures, traffic detours, hours of operation, protective devices, warning signs, and access to abutting properties.

Operational Traffic

The analyzed locations are shown in the Traffic Study and correspond to locations where potential traffic impacts from the proposed Project are most likely to occur. The intersections identified for analysis are as follows:

1. Meridian Avenue and Mission Street
2. Freemont Avenue and Mission Street
3. Fair Oaks Avenue and Mission Street
4. Fair Oaks Avenue and El Centro Street

Project Impacts

Existing Conditions without Project

As discussed in the Traffic Study and shown below in **Table 6.0-4: Existing Intersection Levels of Service**, the intersection operations analysis of existing conditions without the proposed Project indicates that the Fair Oaks Avenue and Mission Street intersection are currently operating at an unacceptable LOS of F during the AM peak hour.

Table 6.0-4
Existing Intersection Levels of Service

Study Intersection	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
Meridian Avenue Mission Street	0.331	A	0.369	A
Freemont Avenue Mission Street	0.719	C	0.727	C
Fair Oaks Avenue Mission Street	1.045	F	0.811	D
Fair Oaks Avenue El Centro Street	0.773	C	0.668	B

Source: Gibson Transportation Consulting, Inc., Traffic Study, January 2017 (refer to Appendix H).

Existing Conditions with Project

As shown in **Table 6.0-5**, the proposed Project is not forecasted to change any existing LOS measurements from existing conditions. As such, impacts would be less than significant.

**Table 6.0-5
Existing with Project Intersection Levels of Service**

Study Intersection	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
Meridian Avenue Mission Street	0.337	A	0.375	A
Freemont Avenue Mission Street	0.722	C	0.729	C
Fair Oaks Avenue Mission Street	1.051	F	0.819	D
Fair Oaks Avenue El Centro Street	0.777	C	0.672	B

Source: Gibson Transportation Consulting, Inc., Traffic Study, January 2017 (refer to Appendix H).

Threshold: **Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b).**

CEQA Guidelines Section 15064.3 (b) (1) states that “Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.” The Project is located approximately 0.14 miles from the Metro Gold Line South Pasadena Station and is within a mixed-use downtown area. As such, it is not expected that the Project would result in an increase in average vehicle miles traveled, and impacts would be less than significant.

Threshold: **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).**

The project Site is currently zoned for mixed use commercial and residential development. All Project designs would be subject to review by the City. Additionally, the proposed Project would be expected to comply with all requirements of the California Building Codes and the South Pasadena Municipal Code and adopted engineering standards to ensure building safety. As such, impacts would be less than significant.

Threshold: **Result in inadequate emergency access.**

The Proposed Project would provide adequate access to the Project Site, including access for emergency vehicles. Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through and around any required road closures. Adherence to these requirements would ensure that adequate emergency access is provided. As such, impacts would be less than significant.

TRIBAL CULTURAL RESOURCES

Threshold: **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**
- **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe**

Assembly Bill (AB) 52 establishes a formal consultation process for California Native American tribes to identify potential significant impacts to TCRs, as defined in PRC Section 21074 as part of CEQA. The procedures under AB 52 offer the tribes an opportunity to take an active role in the CEQA process to protect TCRs. PRC Section 21080.3.1 and 21080.3.2 requires public agencies to consult with tribes identified by the Native American Heritage Commission for the purpose of mitigating a project's potential impacts to TCRs. Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice. Currently no tribes have requested from the City to be notified. Impacts would be less than significant.

UTILITIES AND SERVICE SYSTEMS

Threshold: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or relocation of which could cause significant environmental effects?

Water in the City is supplied by the City of South Pasadena Water Division (SPWD). The City purchases water from the City of Pasadena through any of three interconnections to serve a small portion of the City's service area. The three interconnections have a total capacity of approximately 2.8 million gallons per day (mgd) or 3,226 acre-feet per year (afy).¹⁸

The Project site is in a developed, urbanized portion of South Pasadena that is served by existing water and sewer mains. As shown in **Table 6.0-6: Estimated Water Demand**, it is estimated that the proposed Project would have a net daily water demand of 5,507.1 gallons, or 5.9 afy. This would not result in a significant impact to the City and would not result in the need for new water facilities.

Wastewater entering the County's Joint Water Pollution Control Plant (JWPCP) in Carson undergoes treatment and disinfection before being distributed throughout the service area. The JWPCP is one of the largest wastewater treatment plants in the world and is the largest of the Sanitation Districts' wastewater treatment plants. The facility provides both primary and secondary treatment for approximately 260 mgd and has a total permitted capacity of 400 mgd.¹⁹ As shown in **Table 6.0-6: Estimated Sewage Generation** below, it is estimated that the Project would generate 7,696 gallons per day (gpd) and 4.8 afy of net new wastewater. Given the available capacity of the JWPCP, the Project would not require construction of new wastewater treatment facilities or the expansion of existing facilities.

**Table 6.0-6:
Estimated Water Demand**

Land Use	Quantity	Demand Factor (gpd/unit) ^a	Daily Demand (gpd)	Annual Demand (afy)
Residential: 1-Bedroom	24 du	137.5 gpd/du	3,300	3.7
Residential: 2-Bedroom	12 du	187.5 gpd/du	2,250	2.5
Commercial	7,335 sf	62.5/1,000 gpd/ksf	458.4	0.5

¹⁸ City of South Pasadena, 2015 Urban Water Management Plan, June 2016, <https://www.southpasadenaca.gov/home/showdocument?id=2905>

¹⁹ Sanitation Districts of Los Angeles County, Joint Water Pollution Control Plant (JWPCP), accessed June 2019, <https://www.lacsd.org/wastewater/wwfacilities/jwpcp/>

Total			6,258.4	6.7
<i>Existing</i>	12,020.8	62.5/1,000 gpd/ksf	751.3	0.8
Net Total			5,507.1	5.9

Notes: du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; sf = square feet, ksf = thousand square feet.

^a 125 percent sewage generation loading factor; Los Angeles Bureau of Sanitation, Sewage Generation Factors (April 2012).

**Table 6.0-7:
Estimated Sewage Generation**

Land Use	Quantity	Demand Factor (gpd/unit)^a	Daily Demand (gpd)	Annual Demand (afy)
Residential: 1-Bedroom	24 du	110 gpd/du	2,640	3
Residential: 2-Bedroom	12 du	150 gpd/du	1,800	2
Commercial	7,335	50/1,000 gpd/ksf	366.8	0.4
Total			8,297	5.4
<i>Existing</i>	12,020.8	50/1,000 gpd/ksf	601	0.6
Net Total			7,696	4.8

Notes: du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet.

The Project Site is located in an urbanized location that is currently served by stormwater infrastructure. The Project Site would include permeable paving and landscaping throughout the site to mitigate run off. As such, the volume of stormwater runoff during peak events would not increase and the construction of new stormwater drainage facilities or expansion of existing facilities would not be required.

The Project Site is located in a developed, urbanized setting that is served by existing electric power, natural gas and telecommunications services. In the context of the greater Los Angeles service area, the Project would not be a substantial source of new demand for electrical or telecommunications services. Electricity for the City is provided by the Clean Power Alliance. The Clean Power Alliance purchases clean power and Southern California Edison (SCE) delivers it.²⁰ New connections would be established for the Project; however, no substantial electrical, gas, or telecommunications infrastructure is present on or adjacent to the Project site that would need to be relocated to accommodate the Project.

²⁰ Clean Power Alliance, "About Us", accessed June 2019, <https://cleanpoweralliance.org/about-us/>

Threshold: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Water service is provided by the SPWD. The proposed Project would not directly require or result in the construction of potable water treatment facilities because it would connect into these existing water services.

According to the City's 2015 Urban Water Management Plan (UWMP), the City's projected supply for water during a single dry season was 3,904 afy for 2015. The UWMP projects adequate water supplies through 2040, where supply is projected to be 4,143 afy.²¹ The Project demand for 5.9 afy would be well within the available capacity during a single dry year in 2015. Therefore, it is expected that the SPWD has sufficient water supplies available to serve the proposed Project. Furthermore, as previously stated, the Project applicant would be required to adhere to current standards, including the California Green Building Code, that would reduce demand on local water supplies. Thus, SPWD has sufficient water supplies available to serve the proposed Project from existing entitlements and resources, and no new or expanded entitlements are needed. As such, impacts would be less than significant.

Threshold: 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?

Wastewater flows from the Project site would be conveyed to the JWPCP through existing sewer lines. Operation of the proposed Project would result in an increase in the amount of wastewater generated on the Project site compared to the existing conditions. As stated above, the JWPCP has the capacity to serve the Project's projected wastewater demand, in addition to the provider's existing commitments. As such, impacts would be less than significant.

Threshold: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. The City contracts Athens Services to collect, transport, and dispose of solid waste for all residential and commercial uses.²² The solid waste is collected and taken to Athens's recycling facility, the

²¹ City of South Pasadena, 2015 Urban Water Management Plan, June 2016, <https://www.southpasadenaca.gov/home/showdocument?id=2905>

²² City of South Pasadena, Street and Sewer Division, accessed June 2019, <https://www.southpasadenaca.gov/government/departments/public-works/street-and-sewer-division>

City of Industry Materials Recovery Facility. Food waste is processed and transported to Athens’s compost facility in Victorville, American Organics. Remaining waste that cannot be recycled is disposed on a regular basis to one of four facilities within Los Angeles County.

Table 6.0-8: Los Angeles In-County Class III Landfills shows four landfills located in the County that accept waste from the City and, therefore, could serve the Project site. Based on the combined 2016 average daily disposal rate of 14,122 tons per day, the landfills that accept solid waste from the City have a combined estimated remaining capacity of approximately 85.45 million tons, with remaining life spans ranging between 21 and 25 years. The capacity estimates are conservative because they do not reflect expansions that either have been recently approved or are currently being pursued.

**Table 6.0-8
Los Angeles In-County Class III Landfills**

Landfill	Maximum Daily Capacity (tons)	2016 Average Daily Disposal (tons/day)	Total Disposal Yearly Equivalent (million tons)	2016 Remaining Permitted Capacity (million tons)	Remaining Life (years)
Antelope Valley Landfills I and II ^a	1,800	1,582	0.494	12.89	23
Chiquita Canyon Landfill ^b	6,000	4,544	1.418	–	–
Lancaster Landfill	3,000	500	0.172	10.45	25
Sunshine Canyon Landfill ^c	12,100	7,496	2.339	62.11	21
Total	22,900	14,122	4.423	85.45	

Source: County of Los Angeles, Countywide Integrated Waste Management Plan: 2016 Annual Report, (September 2017), Appendix E-2, Table 1.

^a The City of Palmdale approved the expansion of Antelope Valley Landfill, which consolidates Unit 1 and Unit 2, on June 9, 2011.

^b An expansion of the landfill was recently approved by the Los Angeles County Board of Supervisors in July 2017 (Conditional Use Permit [CUP] No. 2004-00042-[5]). CUP limits waste disposal to 12,000 tons per day, Monday through Saturday, for a total maximum disposal capacity of 60 million tons. The CUP expires July 2047 or when the maximum capacity is reached, whichever is sooner.

^c Sunshine Canyon Landfill is located partially within the City of Los Angeles and partially within unincorporated Los Angeles County. Both portions of the landfill accept waste generated within the City of West Hollywood. On December 31, 2008, operations in the Sunshine Canyon County Landfill and the Sunshine Canyon City Landfill were combined into one to what is known as the Sunshine Canyon City/County Landfill.

Of the various landfills serving the City, Sunshine Canyon Landfill is the largest recipient of nonhazardous solid waste disposal materials (i.e., Class III waste materials). This landfill had a remaining capacity of 62.11 million tons in 2016, with an expected life expectancy of 21 years. The maximum daily capacity for the landfill is 12,100 tons per day, and the 2016 disposal rate was 7,496 tons per day.²³ As shown in **Table 6.0-**

23 County of Los Angeles, County of Los Angeles Integrated Waste Management Report: 2016 Annual Report (September 2017), Appendix E-2, Table 1.

9: Estimated Operational Solid Waste Generation, the Project’s net generation of solid waste is projected to be 286.2 pounds per day, or less than 0.01 percent of the available daily disposal capacity at Sunshine Canyon Landfill.

In addition, the County will continue to address landfill capacity through the preparation of annual County of Los Angeles Integrated Waste Management Plan (CoIWMP) reports. The preparation of each annual CoIWMP report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity.

**Table 6.0-9
Estimated Operational Solid Waste Generation**

Type of Use	Size	Waste Generation Rate ^a (lb./unit/day)	Total Solid Waste Generated (lb./day)
Residential	36 du	8.6 lb./du	309.6
Commercial	7,335	5 lb./ksf/day	36.7
Total			346.3
<i>Existing</i>	<i>12,020.8</i>	<i>5 lb./ksf/day</i>	<i>60.1</i>
Net Total			286.2

Notes: ksf = thousand square feet; lb. = pounds.

CalRecycle, “Estimated Solid Waste Generation Rates” (2018), <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

As such, construction and operation of the proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

Threshold: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed Project would generate solid waste during both construction and operation that is typical of the development of a mixed-use project comprising residential and commercial uses. The proposed Project would fully comply with all federal, state, and local statutes and regulations regarding proper disposal. As such, impacts would be less than significant.

WILDFIRES

If located in near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Threshold: **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

The Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.²⁴ The Project would not impair an adopted emergency reasonable plan or emergency evacuation plan. As such, there would be no impact.

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

The Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones. The Project is located on relatively flat land and would not change or exacerbate current risks of wildfire or pollutant concentrations from a wildfire to project occupants. As such, there would be less a less than significant impact.

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

The Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones. The Project would not require the installation or maintenance of any infrastructure or utility improvements or additions. As such impacts related to infrastructure modifications increasing fire risk would not result in any impacts. As such, no impact would occur, and no mitigation measures are necessary.

²⁴ CalFire, Wildland Hazard and Buildings Codes, "Los Angeles County FHSZ Map," accessed June 2019, https://www.fire.ca.gov/fire_prevention/fhsz_maps_losangeles

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

The Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones. As previously discussed in sections **Hazards and Hazardous Materials** and **Hydrology and Water Quality**, the Project is not located near a potential flooding, landslide area, or would result in potential drainage changes. As such, the Project would result in no impact and no mitigation measures are necessary.