

APPENDIX A

**Notice of Preparation, Distribution List, and Comment Letters Received
During Public Review**

Notice of Preparation (NOP)



Notice of Preparation of an Environmental Impact Report

ORIGINAL FILED

JAN 07 2019

LOS ANGELES, COUNTY CLERK

DATE: January 7, 2019
TO: All Interested Parties
FROM: City of South Pasadena
SUBJECT: Mission Bell Mixed-Use Project (Project No. 2034-CUP, DRX, COA, VTPM)

NOP REVIEW PERIOD: January 7, 2019, through February 5, 2019

The City of South Pasadena (City) will be the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and will prepare an Environmental Impact Report (EIR) for the proposed Mission Bell development (Project) located at 1101–1115 Mission Street (Project Site). This Notice of Preparation (NOP) has been prepared and distributed by the City to solicit written comments from responsible and trustee agencies, and from interested organizations and individuals. The City is requesting input regarding the scope and content of the information to be addressed in the Draft EIR.

Project Location

The Project Site is located on the south side of Mission Street in the block between Fremont Avenue and Fairview Avenue. The Project Site consists of two parcels, 5315-008-045 (1101 and 1107 Mission Street) and 5315-008-043 (1115 Mission Street).

Project Description

The Project would rehabilitate the existing building at 1115 Mission Street; construct a 3-story, mixed-use building at 1101–1107 Mission Street; and construct two levels of subterranean parking beneath the entire Project Site. The Project would consist of 7,335 square feet of commercial space along the Mission Street and Fairview Avenue frontages, as well as 36 residential units on the upper levels and in the interior of the site.

The existing building at 1115 Mission Street has been identified as a historic resource in the City's Inventory of Historic Resources. The Project would retain the 2-story portion of the building that fronts Mission Street; however, the Project would remove most of the existing 1-story addition at the rear of the building. The Project would also remove the existing buildings at 1101 and 1107 Mission Street, which are not on the City's Inventory of Historic Resources.

The Project requires discretionary approvals by the City, including a Conditional Use Permit, Design Review Permit, Certificate of Appropriateness, and a Vesting Tentative Parcel Map.

Probable Environmental Effects

The City has determined that the proposed Project may have a potentially significant impact on the environment and that preparation of a Program EIR is the appropriate level of environmental documentation pursuant to CEQA. Implementation of the proposed Project has the potential to impact the following environmental topics: Aesthetics, Air Quality, Cultural Resources, Land Use and Planning, and Noise.

NOP Review and Comment Period

The NOP review and comment period is from **Monday January 7, 2019**, through **Tuesday, February 5, 2019**. Due to the time limits mandated by State law, please send your written response at the earliest possible date but not later than 30 days after the publication of this NOP. In your response, please include the name of a contact person in your agency. Please direct your written comments to:

Mail: Mr. David Bergman, Interim Director
Planning and Building Department
City of South Pasadena
1414 Mission Street
South Pasadena, California 91030
Email: dbergman@southpasadenaca.gov
Fax: (626) 403-7221

The City will consider all written comments regarding the scope of issues to be addressed in the EIR.

Written comments must be submitted no later than 4:00 PM on February 5, 2019.



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, California 91311



Gavin Newsom
Governor

January 15, 2019

RECEIVED

JAN 24 2019

**CITY OF SOUTH PASADENA
PLANNING AND BUILDING DEPT.**

David Bergman
Interim Director
Planning and Building Department
1414 Mission Street
South Pasadena, CA 91030

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MISSION BELL MIXED-USE PROJECT (PROJECT)

Dear Mr. Bergman:

The Department of Toxic Substances Control (DTSC) has received your Draft Environmental Impact Report for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The draft EIR needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The draft EIR needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the draft EIR should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

David Bergman
January 15, 2019
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

January 24, 2019

dbergman@southpasadenaca.gov

David Bergman, Interim Director
City of South Pasadena, Planning and Building Department
1414 Mission Street
South Pasadena, California 91030

Notice of Preparation of an Environmental Impact Report for the Proposed Mission Bell Mixed-Use Project

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default->

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

[source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf](http://www.scaqmd.gov/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf). In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*”) can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board’s *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of SCAQMD’S *CEQA Air Quality Handbook*. SCAQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB’s Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and SCAQMD Rules

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project. The assumptions in the air quality analysis in the EIR will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

According to the Project Description in the Notice of Preparation, the Proposed Project would remove most of the existing one-story addition at the rear of the building at 1115 Mission Street that has been identified as a historic resource in the City of Pasadena's Inventory of Historic Resources. In the event that asbestos is encountered during demolition and removal, SCAQMD staff recommends that the Lead Agency review SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation³, and include a discussion to demonstrate that the Proposed Project will comply with SCAQMD Rule 1403 in the Air Quality Section of the EIR.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190108-02

Control Number

³ South Coast Air Quality Management District. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
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a California Way of Life.*

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FEB 11 2019

CITY OF SOUTH PASADENA
PLANNING AND BUILDING DEPT.

January 31, 2019

David Bergman
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

RE: Mission Bell Mixed- Use Project for
the Notice of Preparation (NOP) of
Environmental Impact Report (EIR)
SCH # 2019011007
GTS # 07-LA-2019-02146
Vic. LA-110/PM 30.913

Dear Mr. Bergman:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned Notice of Preparation (NOP). The proposed project would rehabilitate the existing building at 1115 Mission Street; construct a 3-story, mixed-use building at 1101-1107 Mission Street; and construct two levels of subterranean parking beneath the entire Project Site. The project would consist of 7,335 square feet commercial space along the Mission Street and Fairview Avenue frontages, as well as 36 residential units on the upper levels and in the interior of the site.

After reviewing this project's Notice of Preparation Caltrans has the following comments:

- Please include traffic analysis with the proposed Environmental Impact Report (EIR) and include the following areas of interest:
 - State Route 110 ramps that may be impacted by this project

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and instead focusing analysis on another metric of impact, "Vehicle Miles Traveled (VMT). Therefore, we are moving towards replacing LOS with VMT when evaluating traffic impact. For any future project, like the proposed EIR, we encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TMD) strategies and Intelligent Transportation System (ITS) applications in order

to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

Caltrans seeks to promote safe, accessible, multimodal transportation and this project's proximity to the Metro Gold Line helps further this goal. Additionally, Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle/locomotive. Caltrans recommends the project to consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and other signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Finally, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Caltrans supports designs that discharge clean run-off water and/or incorporate green design elements that can capture storm water. Incorporating measures such as, but not limited to, permeable pavement, landscaping, and trees reduce urban water run-off and encourage a healthy, sustainable environment.

We look forward to reviewing this project's future EIR and will provide additional comments at that time, if warranted. If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-LA-2019-02146

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

Distribution List

State Clearinghouse
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

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South Coast Region
CEQA (Env. Review & Permitting)
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San Diego, CA 92123

CalTrans District 7
IGR/CEQA Unit
100 S Main Street MS16 12th Floor
Los Angeles CA 90012-3712

Department of Toxic Substances Control
Chatsworth Regional Office
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Chatsworth, CA 91311-6505

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Land Development Division/CEQA
P.O. Box 1460
Alhambra, CA 91802-1460

Ms. Rebecca Leon
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SCAQMD
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Regional Water Quality Control Board
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320 W. 4th St. Suite 200
Los Angeles, CA 90013-2343

Los Angeles County Metropolitan
Transportation Authority (Metro)
CEQA Review Coordination
One Gateway Plaza—MS 99-23-4
Los Angeles, CA 90012-2952

County of Los Angeles
Dept. of Regional Planning
Impact Analysis Section
320 West Temple Street Room 1348
Los Angeles, CA 90012

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Los Angeles, CA 90012-3747

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City of Pasadena
175 North Garfield Avenue
Pasadena, CA 91101

Community Development
City of Alhambra
111 South First Street
Alhambra, CA 91801

Honorable Kathryn Barger
County Supervisor, 5th District
869 Kenneth Hahn Hall of Admin
500 West Temple Street, Room 869
Los Angeles, CA 90012

State Office of Historic Preservation
Ron Parsons
P.O. Box 942896
Sacramento, CA 94296-0001

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Whittier, CA 90601-1415

Los Angeles Conservancy
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523 W. 6th Street Suite 826
Los Angeles, CA 90014

Southern California Assoc. of Govts.
Inter-governmental Review Section
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017