

DRAFT
ENVIRONMENTAL IMPACT REPORT
San Marino Center Improvement Project
SCH No. 2022010094



Prepared for:

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March2022

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LIST OF ACRONYMS

| <u>Acronym</u> | <u>Definition</u> |
|--------------------|---|
| AB 32 | Assembly Bill 32 |
| AB 52 | Assembly Bill 52 |
| ADA | American Disabilities Act |
| AFY | Acre Feet Per Year |
| AQMP | Air Quality Management Plan |
| APE | Area of Potential Effect |
| APN | Assessor Parcel Number |
| BERD | Built Environment Resource Directory |
| BMPs | Best Management Practices |
| CARB | California Air Resources Board |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| City | City of San Marino |
| CMP | Congestion Management Program |
| CNPS | California Native Plant Society |
| CNEL | Community Noise Equivalent Level |
| CO | Carbon Monoxide |
| CRHR | California Register of Historic Places |
| dBA | A-Weighted Decibels |
| DIF | Development Impact Fees |
| DPM | Diesel Particulate Matter |
| DPR | California Department of Parks and Recreation |
| EPA | Environmental Protection Agency |
| ERRP | Enhanced Recharge and Recovery Program |
| ESA | Endangered Species Act |
| FAR | Floor Area Ratio |
| FEMA | Federal Emergency Management Agency |
| FMMP | Farmland Mapping Management Program |
| GHG | Greenhouse Gas |
| GSP | Groundwater Sustainability Plan |
| gpd/acre | Gallons per Day per Acre |
| HABS | Historic American Buildings Survey |
| HAER | Historic American Engineering Record |
| ITE | Institute of Transportation Engineers |
| LOS | Level of Service |
| LST | Localized Significance Threshold |
| MLD | Most Likely Descendent |
| MMRP | Mitigation Monitoring and Reporting Program |
| MRZ | Mineral Resources Zone |
| MS4 | Municipal Separate Storm Water Sewer System |
| MTCO _{2e} | Metric Tons Carbon Dioxide Equivalent |
| MWD | Metropolitan Water District |
| NAHC | Native American Heritage Commission |
| ND | Negative Declaration |
| NO ₂ | Nitrogen Dioxide |
| NO _x | Nitrogen Oxides |
| NPDES | National Pollutant Discharge Elimination System |
| OHP | California Office of Historic Preservation |

| | |
|-----------------------|--|
| PM-2.5 | Particulate Matter Less Than 2.5 Microns in Diameter |
| PM-10 | Particulate Matter Less Than 10 Microns in Diameter |
| PRIMMP | Paleontological Resource Impact Mitigation Monitoring Program |
| RWQCB | Regional Water Quality Control Board |
| Secretary's Standards | Secretary of the Interior's <i>Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings</i> or the Secretary of the Interior's <i>Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings</i> (1995), Weeks and Grimmer |
| SGMA | the Sustainability Groundwater Management Act |
| sf | Square Feet |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SLF | Sacred Lands File |
| SMC | San Marino Center |
| SRA | State Responsibility Area |
| SSC | Species of Special Concern |
| SWPPP | Stormwater Pollution Prevention Plan |
| SWRCB | State Water Resources Control Board |
| VMT | Vehicle Miles Traveled |

1 INTRODUCTION

The California Environmental Quality Act (“CEQA”), codified in the Public Resources Code (PRC), Section 21000 et seq., and the “CEQA Guidelines,” codified in California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387, were established to require public agencies to consider and disclose the environmental implications of their actions before deciding to approve or carry out a project subject to CEQA.

As required by CEQA, this Draft Environmental Impact Report (DEIR): (1) assesses the potentially significant direct, indirect, and cumulative environmental effects of the Proposed Project; (2) identifies potential feasible means of avoiding or substantially lessening significant adverse impacts; and (3) evaluates a range of reasonable alternatives to the Proposed Project, including the required No Project Alternative.

1.1 AUTHORITY

The City of San Marino (City) is the lead agency for the Proposed Project and has the principal responsibility for preparing this DEIR. Approval of the Proposed Project requires discretionary actions by the City of San Marino including but not limited City Council approval of Project construction plans and award of construction contract.

1.2 LEAD AGENCY

As the agency with primary land use authority, the City of San Marino is the Lead Agency under CEQA for this project; as such, the City is responsible for ensuring that the EIR has been prepared in conformance with CEQA and the CEQA Guidelines. The DEIR and associated technical studies were reviewed by the various City departments and the City's DEIR consultant to ensure that the EIR reflects the independent judgment of the Lead Agency.

1.3 INITIAL STUDY INCORPORATED BY REFERENCE

In January 2022, the City prepared “Initial Study, San Marino Improvement Project” (SCH No. 2022010094), herein referred to as 2022 Initial Study, to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) would be appropriate for providing the necessary environmental documentation and clearance for the Proposed Project. The CEQA Guidelines, *Appendix G - Environmental Checklist Form*, criteria were used in the Initial Study evaluation.

The 2022 Initial Study identified that Potentially Significant Impacts would occur in the areas of Cultural Resources and Land Use and Planning. CEQA Guidelines Sections 15006(d) and 15063(c)(3) also allow Lead Agencies to use the Initial Study to identify significant environmental issues and to narrow the scope of an EIR, if required, by focusing the EIR on only those effects determined to be significant.

Therefore, pursuant CEQA Guidelines Section 15126, the Initial Study evaluated all phases of the Proposed Project.

Pursuant to CEQA Guidelines (14 CCR 15000 et seq.), this DEIR consists of an evaluation of the effects of the entire Proposed Project. In the evaluation of all impacts of the Proposed Project for this EIR, the analysis contained in the 2022 Initial Study is incorporated by reference and forms the basis for summarizing information where appropriate in this DEIR (refer to **Appendix F Initial Study - San Marino Center Improvement Project, January 2022**).

1.4 REVIEW OF DRAFT EIR

The City will use this Project DEIR to inform the public and City decision makers of the significant environmental effects of the Proposed Project; identify ways to minimize significant effects; and describe a reasonable range of alternatives to the Proposed Project.

On January 7, 2022, the City circulated a Notice of Preparation (NOP) of a Draft EIR (State Clearinghouse No. 2022010094) for the Proposed Project for a period of 30 days, ending on February 7, 2022. A public scoping meeting was held to explain the environmental review process for the Proposed Project and to provide opportunity to take public comment related to the scope of the Project’s environmental review. The scoping meeting was held before the City Council on January 12, 2022. **Appendix A - Notice of Preparation and NOP Comments** contains a copy of the NOP and comments received during the scoping meeting and NOP comment period. The 2022 Initial Study was made available on the City’s website as part of the NOP notice.

The NOP served to elicit comments from governmental agencies and interested parties regarding the scope and content of issues germane to the DEIR. The baseline for the Project is established by the physical condition that exists at the time the NOP was published.

After the DEIR is complete, the lead agency will file a Notice of Completion (NOC). At that time, there will be a 45-day review period for agencies and interested parties to comment on the DEIR.

1.4.1 Submitting Comments on the DEIR

The review period for this DEIR will be 30 days, beginning on **March 15, 2022** and ending on **April 14, 2022**.

Written comments on the DEIR may be submitted by email, fax or mail to:

City of San Marino - Community Development Department
Attention: Isidro Figueroa, Community Development Director
2200 Huntington Drive, San Marino, CA 91108
Phone: (626) 300-0710
Fax: (626) 300-0716
E-mail: ifigueroa@CityofSanMarino.org

Comments may also be submitted after the end of the formal review period; however, it is possible that they may not be responded to in writing and included in the Final EIR. No comments on the Draft EIR will be responded to outside of the CEQA process, and commenters will not be sent individual responses to their comments. The responses will be contained in the Final EIR. Comments that are received too late for inclusion in the Final EIR will nonetheless be made available to the City Council during its deliberations.

1.4.2 Making Effective Comments

The CEQA process encourages public involvement. Comments on the Draft EIR can be submitted in writing (including as an email). Written comments can be submitted during the draft EIR review period, as discussed below. Verbal comments may also be made at any public meetings held to consider Proposed Project and this EIR.

Written comments are often the most effective method of commenting. They accurately describe the commenter's concerns and can be accompanied by specific references. Whereas the opportunity for verbal comments may be limited to a few minutes at a public hearing, a written comment can be more extensive.

In commenting on this DEIR and the attached Initial Study, commenters should address whether they adequately identify and analyze significant environmental impacts and how they may be avoided or reduced. Comments are most helpful when they specifically address impact conclusions, alternatives, or mitigation measures, or the methods of analysis used by the lead agency to evaluate these issues. Commenters should explain the basis for their comments and include supporting evidence such as data, expert opinion, or other facts. This includes providing the City with copies of any references used as the basis for the comments.

If the reference is available on a website, commenters should provide the City with the specific web address where the reference can be accessed.

2 EXECUTIVE SUMMARY

This chapter is a summary of the Draft Environmental Impact Report (DEIR) for the San Marino Center Improvement Project (Proposed Project) prepared pursuant to the California Environmental Quality Act (CEQA). The San Marino Center (SMC), owned and operated by the City of San Marino, is located at 1800 Huntington Drive, San Marino, which is the south side of Huntington Drive, between West Drive on the east and Virginia Road on the west (**Exhibit 2-1: Regional Vicinity** and **Exhibit 2-2: Project Site**) located at the end of this section.

The San Marino Women’s Club (Club), which constructed the SMC in 1951/52, used the SMC for its Club meetings, its charitable community events and for private functions such as wedding receptions and sorority events. The City purchased the building from the Club in 2005 and plans to use as a public community center and for various City recreation programs. Following a 2011 historical evaluation of the building, the California State Historic Preservation Office (SHPO) found the SMC eligible for inclusion in the National Register of Historic Places for its social connection to the community as the City’s first community center. Therefore, the SMC was automatically placed on the California Register of Historic Places, and, by City Code Section 23.18.03 (A), the SMC is considered a City landmark.

2.1 PROJECT OBJECTIVES

In 2020, the City formed a working group to discuss how to revitalize and improve the SMC. The primary discussions of the working group focused on how to encourage better use of the facility, the need for facility repair and renovation and the need to create aesthetic continuity with the adjacent public buildings. Through a number of meetings and public hearings, the City working group recommended the following Project objectives:

- Create architectural, aesthetic continuity along eastbound Huntington Drive between Virginia Road and West Drive by changing the SMC building façade’s architectural features from the existing Modern Colonial Revival to the Spanish-Mediterranean style which contain architectural features noted by the City’s library on the east and the school campus structures to the west.
- Replace interior aged electrical and mechanical systems with code compliant systems including replacing light fixtures;
- Rehabilitate interior space to house City recreational staff;
- Rehabilitate interior space to optimize community use for large and small public and private events; and
- Retrofit and update the facility and grounds with ADA-compliant features.

2.2 PROJECT OVERVIEW

The Proposed Project will make both exterior and interior modifications to the San Marino Center (SMC), which is eligible for listing to the National Register of Historic Places, is on the California Register of Historical Resources, and which is a City Landmark under San Marino City Code, Chapter XXIII, Article 18 Section 23.18.03 (A). The exterior upgrades will change the existing architectural style of the building façade from “Modern Colonial Revival” to a “Spanish Mediterranean” architectural style which is similar

to that of the adjacent Crowell Public Library to the east and the San Marino Unified School District buildings to the west.

Building interior upgrades include but are not limited to: adding offices to accommodate six City Recreation Department staff; optimizing the interior public gathering space; replacing to current standards the heating/air conditioning, plumbing, and electrical systems; and replacing the period light fixtures and flooring with modern fixtures and flooring. Other updates include various exterior and interior improvements for compliance with the Americans with Disabilities Act (ADA).

2.3 SUMMARY OF SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The Initial Study was prepared pursuant to the State CEQA Guidelines as a first step in the evaluation of the environmental consequences of the Proposed Project, to determine whether the Proposed Project could result in significant impacts and to define the scope of any additional analyses needed to fully assess such impacts and to develop measures to avoid or reduce the impacts to below a level of significance. The 2022 Initial Study is provided in Appendix F.

For each issue evaluated, the Initial Study indicated that the project would have: a) no impact or a less than significant impact; b) a less than significant impact with the imposition of specified mitigation measures; or c) a potentially significant impact.

The Initial Study was prepared using the CEQA Guidelines Appendix G Checklist as a guide. The analysis in the 2022 Initial Study determined that the Proposed Project would have: a) no impact or a less than significant impact; or b) a less than significant impact with the imposition of specified mitigation measures for the following issues.

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

2.4 SUMMARY OF POTENTIALLY SIGNIFICANT EFFECTS

The results of the 2022 Initial Study (Appendix F) determined that for two criteria in two evaluation categories, the Proposed Project could result in potentially significant impacts that could not be easily mitigated. Therefore, these categories required further evaluation in the DEIR:

- Cultural Resources (area of V.a - Historic Resources only)
- Land Use and Planning (area of XI.b - Conflicts with plans and policies only)

2.5 SUMMARY OF CONCERNS RAISED DURING NOP

Comments received during the Scoping Meeting and NOP Comment Period requested that the DEIR provide additional analysis in the following categories:

- Transportation (traffic circulation and vehicle miles traveled); and,
- Public Services (area of Schools only)

The results of the 2022 Initial Study determined that the impacts in these two categories were either less than significant, or less than significant with mitigation incorporated. However, in response to the comments received during the Notice of Preparation process and scoping meeting, the request for further evaluation is provided for the specific threshold criteria to which the requests relate.

2.6 AREAS OF CONTROVERSY

CEQA Guidelines Section 15123(b)(2) requires that an EIR identify areas of controversy, including issues raised by other agencies and the public.

The areas of known controversy associated with the Proposed Project that are relevant to the EIR include the aesthetics of the SMC building, the potential for additional traffic, and potential event parking conflicts within the shared school district parking lot. These are further identified as follows:

Renovation of an Historic Resource: Beginning in January 2018, the City conducted extensive outreach regarding re-envisioning the City’s recreation program. Between August and September 2020, the City surveyed the community regarding the needs and appearance of the SMC. One of the survey questions asked the community if the City should restore the original 1950s exterior architecture or remodel it to match other City buildings such as the adjacent Crowell Public Library. Of the 209 responses received, there was no clear consensus as to the architectural style for the SMC. Based on the City’s overall vision in its General Plan, the City Council proceeded to prepare renovation plans, which constitutes the Proposed Project.

Transportation and Parking: Commenters raised concerns during the NOP comment period and scoping meeting regarding the potential for increased traffic congestion and conflicts with parking. The Huntington Middle School shares its parking lot with the SMC, Crowell Public Library and San Marino Unified School District office. Additionally, the Huntington Middle School completed the Barth Athletics Complex (BAC) in late 2019 to replace its outdated gym and athletic center, but the BAC has not been utilized to its full capacity due to COVID-19 pandemic school and community shutdowns. Therefore, it is unknown if the BAC would generate a greater capacity for event traffic and parking demand beyond what the school offered prior to the BAC construction.

2.7 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The San Marino City Council serves as the decision-making body for the Proposed Project. Issues to be resolved by the City Council include: (1) how to mitigate the significant effects of the Proposed Project;

(2) whether to reject or approve one of the alternatives to the Proposed Project and other environmental findings; and (3) whether to reject or approve the Proposed Project.

If the City Council approves the Proposed Project it must also adopt detailed findings regarding each of the project's significant environmental impacts (see Public Resources Code § 21081 and CEQA Guidelines § 15091) and if the project will result in a significant and unmitigated or unavoidable impact the City Council would also have to state in writing the reasons to support the approval in an additional finding known as a statement of overriding considerations (see CEQA Guidelines § 15093).

2.8 PROJECT ALTERNATIVES

Section 15126.6 of the CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to the Proposed Project or to the Proposed Project location that would feasibly attain most of the Proposed Project objectives but would avoid or lessen any significant environmental impacts. An EIR should also evaluate the environmental impacts of the alternatives compared to the Proposed Project.

Table 2-1 Significant Effects Comparison Summary Project vs Alternatives, located at the end of this section, summarizes how the alternatives compare to the Proposed Project based on the analysis in the Initial Study and this DEIR. Section 7 of this DEIR describes and evaluates alternatives to the Project and is intended to implement the requirements set forth in the CEQA Guidelines.

This chapter also identifies the Environmentally Superior Project Alternative as required by CEQA Guidelines Section 15126.6(e)(2).

2.8.1 Alternative 1 – Preservation Alternative

The 2011 cultural resources report that was considered by the SHPO during its historic resource determination review, defines the architectural style of the SMC as a "Modern Colonial Revival." The SMC is situated adjacent to the Crowell Public Library on the east and the Huntington Middle School on the south and west, both of which have elements of a "Spanish Mediterranean" architectural style. Aside from the SMC being in an overall deteriorated condition, noticeably different features that are inherent to the specific architecture styles include:

- Tile Roof (library) versus wood shake roof (SMC); and
- Stucco porch columns and trellises (library) versus decorative metal porch posts and no trellises (SMC)

This alternative consists of restoring the SMC in a manner that would provide symmetry with the architectural style of the Crowell Public Library while still following the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995), Weeks and Grimmer (referred to as "Secretary's Standards").

With respect to CEQA Guidelines Section 15126.4(b)(1), if the Project is consistent with the Secretary's Standards, the impact to historical resources would be less than significant.

In November 2021, Chattel Historic Preservation Consultants (Chattel) provided the City with a technical memo (Chattel Memo) that outlined concepts of various project design components to ensure consistency with the Secretary’s Standards and still achieve symmetry with the adjacent Crowell Public Library (**Appendix B - *Chattel Historic Preservation Architect Technical Memo, November 15, 2021***). Chattel is a historic preservation consultant who meets the Secretary of the Interior’s Professional Qualification Standards in architecture, historic architecture, and architectural history.

In summary, the Chattel Memo in Appendix B identified the following components needed to ensure the Project is consistent with the Secretary’s Standards while achieving symmetry with adjacent public library and school buildings:

- Remove the physical additions to the building (date unknown) to return the building symmetry to its original design;
- Replace the landscape planter that was removed;
- Repaint the building to the color of the library;
- Replace the wood shake roof with a red asphalt shingle similar to the tile color on the library, or use a specific type of tile provided the building could support the weight;
- Replace the windows with a specific window type that is compliant with the original type yet would complement the window style used in the library.

Within the interior, the Chattel Memo encouraged the period chandelier light fixtures to be preserved and re-lamped; the San Marino Women’s Club emblem in the floor must be preserved in its original location. All safety and HVAC improvements can be completed as planned.

The Chattel Memo also noted that the any final design must be performed in collaboration with a qualified historic preservation consultant to ensure compliance with the Secretary’s Standards.

This alternative would meet most of the Project Objectives in that it would provide the aesthetic symmetry desired between the Crowell Public Library, SMC and the school buildings. However, while this alternative will provide symmetry between the Spanish architectural features of the Crowell Public Library and school buildings, this alternative will not contain all of the same architectural components of the library and school buildings.

2.8.2 Alternative 2 – No Project

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. According to CEQA Guidelines Section 15126.6(e), the No Project Alternative must include the assumption that conditions at the time of the NOP (i.e., baseline environmental conditions) would not be changed because the Proposed Project would not be implemented. The No Project Alternative must also describe the events or actions that would be reasonably expected to occur in the foreseeable future if the Proposed Project were not approved.

The No Project Alternative assumes that the Proposed Project would not be implemented, and the existing conditions would remain. Because no improvements would occur on the Proposed Project site, this alternative would not meet any of the Proposed Project objectives.

2.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(b) indicates that a list of reasonable alternatives must be developed and considered by the lead agency. Elimination of potential environmental impacts of the Proposed Project should be considered when developing potential alternatives. As evaluated in Chapter 5 of this DEIR, the potentially significant impacts of the Proposed Project are: Cultural Resources and Land Use.

As shown in Table 2-1, the No Project Alternative would be environmentally superior to the Proposed Project, based on the minimization or avoidance of most of the Proposed Project's significant environmental impacts. The No Project alternative, however, could cause further deterioration of the building, which is a prominent feature on Huntington Drive, a main City thoroughfare and a gathering place used by the general public. Further, the No Project Alternative does not meet any of the basic Project Objectives. Additionally, CEQA Guidelines, Section 15126.6(2) requires that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

The Environmentally Superior Alternative is Alternative 1 - Preservation Alternative. This alternative meets most of the Project Objectives, and impacts would be less than significant.

Table 2-1: Significant Effects Comparison Summary - Project vs Alternatives*

| Issue Area and DEIR Section Discussion | Proposed Project | Alternatives | |
|---|------------------|-------------------|-----------------|
| | | 1 Preservation | 2 No Project |
| Significant Effects of Proposed Project | | | |
| 5.1 Cultural Resources – Historical Resources | SU | ▼ | ▼ |
| 5.2 Land Use and Planning - Policies | SU | ▼ | ▼ |
| Effects Found Not Significant or Less Than Significant as Part of the Initial Study and DEIR Process | | | |
| 4.1 Aesthetics | NS | — | — |
| 4.2 Agriculture and Forestry | NS | — | — |
| 4.3 Air Quality | NS | — | ▼ |
| 4.4 Biological Resources | LTS-M | — | ▼ |
| 4.5 Cultural Resources (Archaeology, Human Remains) | LTS-M | — | — |
| 4.6 Energy | NS | — | — |
| 4.7 Geology and Soils | NS | — | ▼ |
| 4.8 Greenhouse Gas | NS | — | — |
| 4.9 Hazards and Hazardous Materials | LTS-M | — | ▼ |
| 4.10 Hydrology and Water Quality | NS | — | — |
| 4.11 Land Use – Physically Divide Community | NS | — | — |
| 4.12 Mineral Resources | NS | — | — |
| 4.13 Noise | LTS-M | — | ▼ |
| 4.14 Population and Housing | NS | — | — |
| 4.15 Public Services | LTS-M | — | ▼ |
| 4.16 Recreation | NS | — | ▲ |
| 4.17 Transportation | LTS | — | ▼ |
| 4.18 Tribal Cultural Resources | LTS-M | — | ▼ |
| 4.19 Utilities and Service Systems | NS | — | — |
| 4.20 Wildfire | NS | — | — |

Notes:

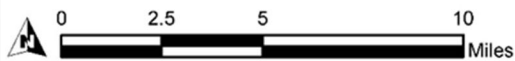
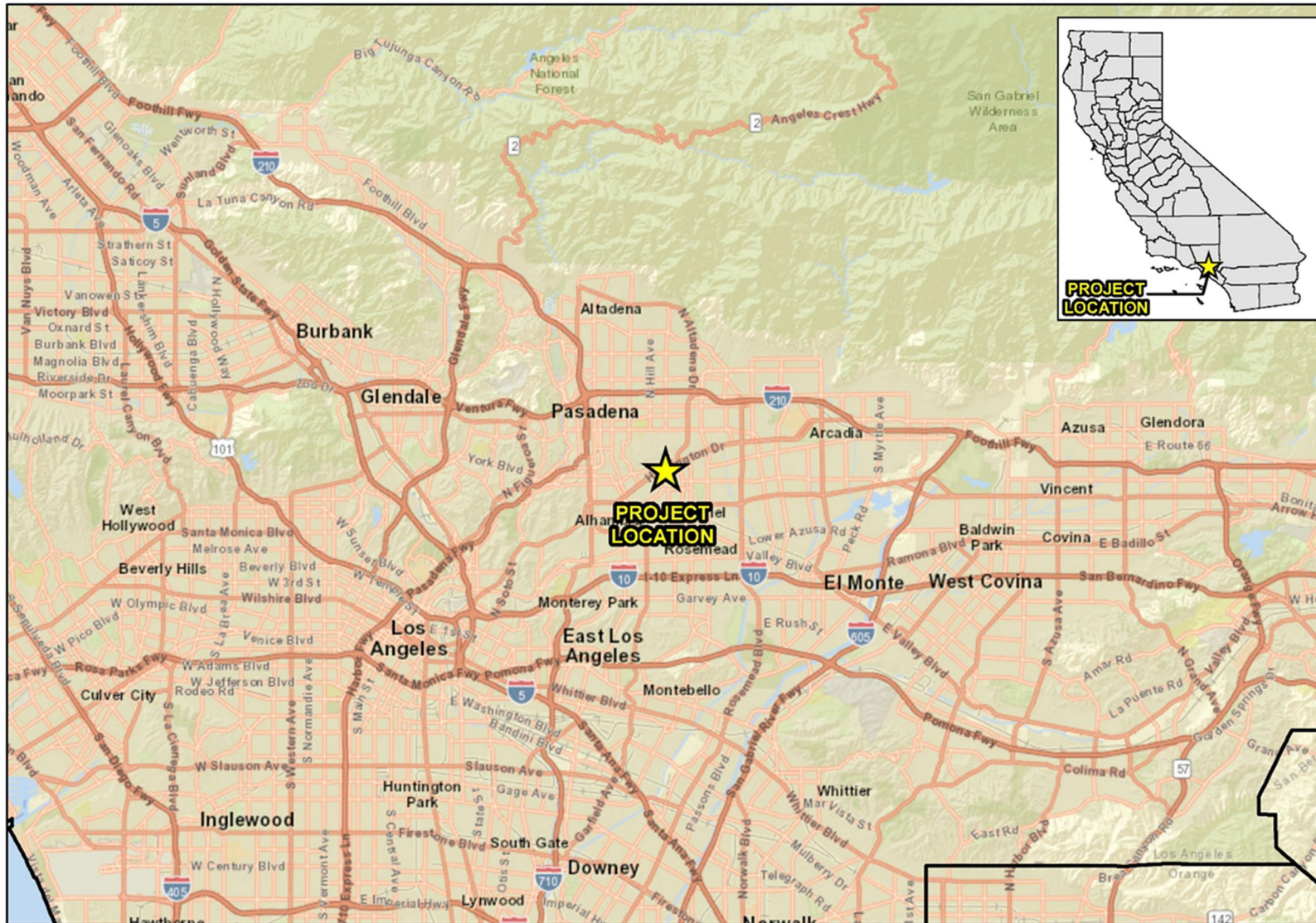
*Refer to Table 7-1 for a detailed significance determination. Section 7 of this DEIR provides the detailed evaluation of the Project alternatives.

SU = Potentially significant and unavoidable.

LTS-M = Less than significant with mitigation incorporated.

NS = Not significant or Less Than Significant Without Mitigation.

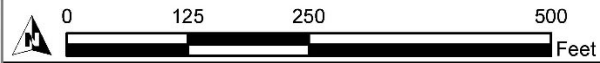
- ▲ Alternative is likely to result in greater impacts to issue when compared to Proposed Project.
- Alternative is likely to result in similar impacts to issue when compared to Proposed Project.
- ▼ Alternative is likely to result in reduced impacts to issue when compared to Proposed Project.



Source: World Street Map, Los Angeles County

SAN MARINO CENTER IMPROVEMENT PROJECT
Regional Vicinity

Exhibit 2-1



Source: ESRI Aerial Imagery, Los Angeles County

SAN MARINO CENTER IMPROVEMENT PROJECT

Project Site

Exhibit 2-2

3 PROJECT OBJECTIVES, DESCRIPTION, LOCATION AND ENVIRONMENTAL SETTING

3.1 PROJECT OBJECTIVES

Beginning in January 2018, the City conducted extensive outreach regarding re-envisioning the City's recreation program and formed a working group in 2020. The primary discussions of the working group focused on how to encourage better use of the facility, the need for facility repair and renovation and the need to create aesthetic continuity with the adjacent public buildings.

Through a number of meetings and public hearings, the City working group recommended the following Project Objectives:

- Create architectural, aesthetic continuity along eastbound Huntington Drive between Virginia Road and West Drive by changing the SMC building façade's architectural features from the existing Modern Colonial Revival to the Spanish-Mediterranean style that are present on the Crowell Public Library, east and adjacent to the SMC and the school campus structures to the west of the SMC;
- Replace interior aged electrical and mechanical systems with code compliant systems including replacing light fixtures;
- Rehabilitate interior space to house City recreation department staff;
- Rehabilitate interior space to optimize community use for large and small public and private events; and
- Retrofit and update the facility and grounds with ADA-compliant features.

3.2 PROJECT LOCATION

The Project is located at 1800 Huntington Drive, San Marino, on the south side of Huntington Drive, between West Drive on the east and Virginia Road on the west (Exhibits 2-1 and 2-2) and is identified as Los Angeles County Assessor's Parcel Number (APN) 5334-024-903. The Project site is adjacent to and east of the Huntington Middle School and west of and adjacent to the Crowell Public Library and contains the SMC building and associated landscaping.

The Project site is zoned R-1, Residential. According to Section 23.02.01 of the San Marino Municipal Code, recreational and childcare activities may be conducted on properties in residential zones that are owned by the City. Residential land uses are located east of West Drive and on the north side of Huntington Drive in proximity to the Project site.

The SMC is an approximately 10,832 square-foot-building with a concrete foundation, flat roof and raised parapet along the rear and side elevations. The building is two stories, with the primary meeting spaces on the first floor and limited space and mechanical/electrical rooms on the second floor. In its existing configuration, the SMC has a current occupancy rating of 1,020.

3.3 ENVIRONMENTAL SETTING

The SMC building was originally constructed in 1951/1952 by the San Marino Woman’s Club to hold community events and club meetings. In 2005, the City purchased the SMC from the San Marino Women’s Club to use as a community center and meeting space for senior and youth recreation programs, and community events and other activities.

The SMC building was studied in 2011 to determine the building’s historical significance. The 2011 study described the architectural style as “Modern Colonial Revival,” which is not recognized as a unique style of architecture. Designed by architect Marion Varner as one of his earlier designs, the SMC is a large primarily one-story building with a flat roof and raised parapet along the rear and side elevations. The front elevation features a side-facing medium gable roof with an offset front gable wing. An L-shaped porch runs across the front elevation and is supported by decorative wrought iron posts. The roof is covered with wood shingles. A large multi-paned steel framed window is located below the main front gable. Underneath the window is brick trim. A tall exterior brick chimney is located on the northeast elevation. Windows are primarily multi-paned steel casements. Siding is stucco and foundation is concrete. The interior of the building when first built contained a large auditorium, dining room, meeting room and office. There were two additions in 1958.

Adjacent to the SMC is the Crowell Library (to the east) which was originally constructed in 1951/52, at about the same time as the construction of the SMC, but it was demolished and completely reconstructed in 2006. The Henry E. Huntington Middle School (constructed in 1918) is located directly west of the SMC. The Valentine Elementary School (west of the middle school) was constructed in 1938. The San Marino Unified School District offices are located within the middle school grounds. These buildings were constructed in a “Spanish Mediterranean” architectural style notably with tile roofs, wood accents, and stucco columns.

3.3.1 Site Access and Parking

Vehicle access to the SMC is located on Huntington Drive and West Drive. The SMC can also be accessed by public transit service, provided by Los Angeles Metro (Metro). Bus stops are located within walking distance of the SMC, including at Huntington Drive/West Drive and Huntington Drive/Cambridge Road both of which are approximately 500 feet to the east of the SMC, and one at Huntington Drive/Virginia Road approximately 1,100 feet to the west of the SMC.

Parking for the SMC is designated as 48 spaces near the south side of the building in the parking lot of the Henry E. Huntington Middle School, as well as in the parking lot of the adjacent Crowell Public Library. The 48 spaces on the south side of the building in the school parking lot is provided through a cooperative agreement with the San Marino Unified School District (SMUSD) for use by the City for both SMC parking and overflow parking for the Crowell Public Library. The agreement between the City and the SMUSD was initiated in 2006 after the City purchased the building and the agreement was renewed in 2019 for a 10-year term (refer to Appendix A in the 2022 Initial Study, located in Appendix F of this DEIR). The shared parking arrangement with the SMUSD appears to be a traditional feature for the SMC and the Crowell Library. The 1952 SMC site plans indicate “school parking area” on the west and south sides of the building footprint, and historical articles in the Los Angeles Times indicate that the San Marino Women’s Club historically used the “school parking area” for club parking and for community events.

3.3.2 Historical Status

In June 2011, the SMC underwent a required federal historical review as part of a project to install an ADA compliant door and other features, which was funded through the U.S. Department of Housing and Urban Development through the County of Los Angeles Community Development Block Grant program. The 2011 study stated that the integrity of the building appeared sufficient for eligibility to the National Register of Historic Places for its association as being San Marino’s first community center.

The California Office of Historic Preservation (OHP) agreed with the federal assessment and also formally listed the SMC in the California Register of Historical Resources (California Register) under Criterion 1, for association with an event important to the history of the San Marino community. The OHP identifies the SMC as listed on the California Register through its listing on the State’s Built Environment Resource Directory (BERD). The SMC is also a City landmark pursuant to the San Marino City Code, Chapter XXIII, Article 18 Section 23.18.03 (A) “Automatic Designation” because a property within the City that is listed in the National Register of Historic Places or the California Register of Historic Places is automatically designated as a historic landmark.

3.4 PROJECT DESCRIPTION

The City currently uses the SMC as a public community center and for various City recreation programs. **Table 3-1 - Example of Existing and Proposed Uses of the SMC**, located at the end of this section, identifies existing and proposed uses for the SMC. Existing programs will continue after the Project is completed, although the City desires to improve upon the existing services offered at the SMC. The proposed uses include the ability to hold new types of events and office space for recreation staff. Table 3-1, which was included in the 2022 Initial Study, formed the basis of the analysis of the 2022 Initial Study and this DEIR. The building improvements and modernization are designed to allow for optimization of existing and proposed uses. The 2022 Initial Study analysis focused primarily on the potential impacts of new/proposed events that were anticipated to have larger attendance.

The Proposed Project would also change the SMC building façade from a “Modern Colonial Revival” to a “Spanish Mediterranean” architectural style, which is similar to that of the adjacent library and school buildings. Other building improvements include various upgrades and enhancements for Americans with Disability Act (ADA) compliance, rehabilitating the building’s interior to include additional offices to accommodate six City Recreation Department staff, optimizing the interior public gathering space, and replacing the heating/air conditioning, plumbing and electrical systems and light fixtures to comply with current building code standards. The specific improvements for the SMC building are described in the following sections. Detailed site plans are also provided in **Appendix C - Proposed Site Plan, Layout and Landscape Plans**.

The existing building design occupancy rating is 1,020. The proposed interior space reconfiguration will allow for a design occupancy rating of 1,083.

3.4.1 Exterior Improvements – Façade Features

Exterior improvements include the following. Refer to **Exhibit 3-1: Existing Site - Northwest Elevation** for the existing view and **Exhibit 3-2** through **Exhibit 3-4** for proposed views of the northwest, southeast and northeast.

- Replace the decorative wrought iron posts along the front patio with stucco columns;
- Replace the wood shingled roof with the terra cotta tile;
- Replace doors and windows to include grid patterns similar to the library windows; type of windows will be newer energy efficient;
- Remove asbestos containing materials in accordance with applicable laws and regulations;
- Add wood accents where appropriate and complimentary such as around windows and the entry door consistent with features of architectural style;
- Add an open patio area at the back of the building that will have a stucco wall and a wood trellis ceiling similar to the open space areas at the library;
- Modify concrete walkway and front patio to enhance design elements and ADA compliance;
- Remove canopies over patio and windows that were added to the building after its original construction; and,
- New paint and stucco repair that will match the color of the library.

Exterior features that are anticipated to remain intact or will not be impacted by the Proposed Project improvements include the following:

- The cornerstone of the building inscribed with “San Marino Women’s Club” near the building entry and,
- The two large oak trees in the front yard adjacent to the front entry.

3.4.2 Interior Improvements

The interior components/spaces to be renovated are intended to optimize the use for events, office space, recreational classrooms and provide ADA compliance. Refer to **Exhibit 3-5: Existing Floor Plan** for the existing interior layout and **Exhibit 3-6: Proposed Floor Plan** for the proposed interior layout (also refer to Appendix C). The interior renovations include but are not limited to the following:

- Add two offices (for a total of three offices);
- Install a folding wall in the main room;
- Upgrade the kitchen, bathrooms, ceiling tiles, and electrical and mechanical systems to comply with current code standards;
- Remove asbestos containing materials in accordance with applicable laws and regulations;
- Remove and replace light and plumbing fixtures with current style fixtures;
- Replace entryway flooring containing the San Marino Women’s Club insignia (insignia to be preserved as a plaque inside the facility);
- Perform various upgrades for ADA compliance, including but not limited to: retrofit of the restrooms with features that include but are not limited to appropriate door hardware and door threshold widths; retrofit the main floor access to the from only stairs to stair and personnel lift;

- Remove, replace and update paint and carpet; and,
- Conduct other deferred maintenance items.

Interior features that are not anticipated to be impacted by the Proposed Project improvements include the following:

- Fireside room fireplace and cabinetry; and
- Stage.

3.4.3 Utility/Hardscape/Landscape Improvements

Some improvements will occur outside of the building envelope. Detailed landscape and utility plans are provided in Appendix C. The landscape plans identify that the larger trees on site will be preserved.

Some excavation will be required and includes surficial disturbance for site preparation for new ADA parking and loading, sidewalk repair, parking lot paving, and landscaping enhancement, as well as deeper excavation for new utility installation where utility trenches will generally vary between 2 to 3 feet wide by 1 to 3 feet deep, depending on the activity (refer to **Exhibit 3-7: Approximate Excavation Locations**). The activities that require excavation include but are not limited to the following:

- Install new domestic water service and sewer lines in the same area as the existing lines;
- Replace overhead electrical service with new underground electrical service;
- Replace landscaping with drought-tolerant plant materials suitable for placement underneath oak trees and provide aesthetic continuity with the Crowell Public Library landscaping;
- Install new landscape irrigation meter, with pipe replacements, as necessary, in the same location as existing;
- Install new, separate water service for the fire sprinkler system;
- Install new footings for new patio site walls and pilasters, trash enclosure, building columns;
- Add various upgrades for ADA compliance including but not limited to: accessible paths of travel to entry points from disabled parking in the parking lot; and,
- Repair existing building footings and slab where applicable.

3.4.4 Project Timing

Construction is expected to last approximately 12 to 18 months, beginning in late fall/early winter 2022, with facilities opening as available in spring/summer 2023.

Table 3-1: Example of Existing and Proposed Uses of the SMC

| Classes | Existing (E) or Proposed (P) | No. of Users/ Participants | Frequency |
|---|-------------------------------------|-----------------------------------|---|
| Bridge Club | E/P | 40 | Mondays 12-4pm, Wednesdays 11am-2pm. Wednesdays 7:15-10:45pm |
| Tai Chi Class | E/P | 10 | Mondays & Wednesdays 7-9pm |
| Gentle Yoga Class | E/P | 75 | Tuesdays & Thursdays 10-11am |
| Safe & Steady Class | E/P | 7 | Thursdays 12:30-1:30pm |
| Adult Line Dance Class | E/P | 12 | Thursdays 7:30-9pm |
| Fit & Fabulous Class | E/P | 7 | Fridays 8-9am |
| Chair Fitness Class | E/P | 7 | Fridays 9-9:45am |
| Intro to Piano Class | E/P | 6 | Tuesdays 3-5pm |
| Musical Theater Camp | E/P | 25 | 2 weeks in July 9-3pm |
| Civic Club/Charitable Group Events/Meetings | Existing (E) or Proposed (P) | No. of Users/ Participants | Frequency |
| City Club | E/P | 150 | 3 rd Tuesday of every month 3-10pm |
| Unit Bridge | E/P | 60 | 1 st Sunday of each month 9am-3pm |
| Rotary Club | E/P | 100 | Once a year - Weekday 5-10pm |
| PTA | E/P | 250 | Twice a year - Weekday & Weekend, 8am 4-(8 hours) |
| NCL | E/P | 50 | Once a year - Weekend 10am-2pm 4 hours |
| Civic Club/Charitable Group Events/Meetings (Large Group) | P | 200 | Sat PM, 1 per quarter |
| Private Event Usage | Existing (E) or Proposed (P) | No. of Users/ Participants | Frequency |
| Church Service | E/P | 250 | 2 Saturdays each year - 5-9pm |
| Private Industry Conferences | P | 100 | 2 times per year Weekday & Weekend 8am – 4pm (varies) |
| Private Celebrations | E/P | 75-125 | 12 rentals on random weekends throughout year (approx.: 6 hours each) |
| City Administration Uses | Existing (E) or Proposed (P) | No. of Users/ Participants | Frequency |
| City Council Meetings | E/P | 20-40 | 24 times per year |
| Recreation Staff | P | 7 | M-Th 7 am-5 pm Friday 7 am-11am |
| Guest Speaker Series' | E/P | 30 | 12 times per year - Weekday 12-3pm |
| Recreation Commission Meetings | E/P | 15 | 6 times per year - Weekday 6-9pm |
| Town Hall Meetings | E/P | 30 | 12 times per year |
| Human Resources FD/PD Training | E/P | 30-50 | 6 times per year - Weekday & Weekend 8am (Varies 4-8 hours) |
| Human Resource Testing | E/P | 30 | 6 times per year - Weekday 8am (Varies 4-8 hours) |

Notes:

E/P = existing use that is proposed to continue after the Project.

The 2022 Initial Study analysis focused primarily on new, Proposed events, primarily with anticipated larger attendance.



Not to Scale

SAN MARINO CENTER IMPROVEMENT PROJECT
Existing Northwest View (facing Huntington Drive)

Exhibit 3-1



Not to Scale

Source: Crane Architecture Group

SAN MARINO CENTER IMPROVEMENT PROJECT
Proposed Northwest View (Adjacent to School Parking Lot)

Exhibit 3-2



Not to Scale

Source: Crane Architecture Group

SAN MARINO CENTER IMPROVEMENT PROJECT
Proposed Southeast View (Rear View)

Exhibit 3-3



Not to Scale

Source: Crane Architecture Group

SAN MARINO CENTER IMPROVEMENT PROJECT
Proposed Northeast View (Adjacent to Library)

Exhibit 3-4

4 ENVIRONMENTAL IMPACTS FOUND NOT SIGNIFICANT

Pursuant to CEQA and the CEQA Guidelines, this DEIR consists of an evaluation of the effects of the entire Proposed Project. For this DEIR analysis, the analysis contained in the 2022 Initial Study is incorporated by reference and forms the basis for summarizing information where appropriate in this DEIR.

The criteria from the CEQA Guidelines, *Appendix G - Environmental Checklist Form*, were used in the Initial Study evaluation. CEQA also identifies individual threshold criteria within each evaluation subject where, through analysis, project impacts are determined to have no impact, a less than significant impact, a less than significant impact after mitigation measures are applied, or a potentially significant impact.

The results of the 2022 Initial Study (Appendix F) analysis determined that the Proposed Project would have no impacts, less than significant impacts, or less than significant impacts after mitigation measures were applied in most evaluation subjects. This section summarizes the analysis for each evaluation subject as addressed in the 2022 Initial Study. Detailed analysis can be found in the 2022 Initial Study (Appendix F). **Table 4-1: CEQA Checklist and Initial Study Matrix - Non-Significant Effects** identifies the CEQA Checklist evaluation subjects and the corresponding 2022 Initial Study sections.

In the evaluation subjects of V. Cultural Resources and XI. Land Use and Planning, some individual threshold criteria were found to have potentially significant effects; it is only those individual benchmark criteria that are further evaluated in Section 5 of this DEIR.

All threshold criteria in the evaluation subjects of XVII. Transportation and XV. Public Services were also determined to have either no impact, less than significant impact, or less than significant impacts after mitigation measures were applied. However, comments received during the NOP comment period and scoping meeting requested that an additional evaluation be provided for two threshold criteria for these evaluation subjects. Therefore, for the evaluation subject categories of XVII. Transportation and XV. Public Services only the two threshold criteria relevant to the NOP comments are discussed in Section 5 of this DEIR.

Table 4-1: CEQA Checklist Subject Areas and Initial Study Matrix – Non-Significant Effects

| CEQA Guidelines Checklist Section | Initial Study Section | Mitigation Measures | DIER Section |
|-------------------------------------|-----------------------|------------------------|--------------|
| I. Aesthetics | 4.1 | | 4.1 |
| II. Agricultural and Forestry | 4.2 | | 4.2 |
| III. Air Quality | 4.3 | | 4.3 |
| IV. Biological Resources | 4.4 | BIO-1, BIO-2 | 4.4 |
| V. Cultural Resources | 4.5 | CUL-1 | 4.5 and 5.1 |
| VI. Energy | 4.6 | | 4.6 |
| VII. Geology and Soils | 4.7 | | 4.7 |
| VIII. Greenhouse Gas | 4.8 | | 4.8 |
| IX. Hazards and Hazardous Materials | 4.9 | HAZ-1, HAZ-2, HAZ-3 | 4.9 |
| X. Hydrology and Water Quality | 4.10 | | 4.10 |
| XI. Land Use and Planning | 4.11 | | 4.11 and 5.2 |
| XII. Mineral Resources | 4.12 | | 4.12 |

| CEQA Guidelines Checklist Section | Initial Study Section | Mitigation Measures | DIER Section |
|------------------------------------|-----------------------|---------------------------------|--------------|
| XIII. Noise | 4.13 | NOI-1 | 4.13 |
| XIV. Population and Housing | 4.14 | | 4.14 |
| XV. Public Services | 4.15 | PS-1, PS-2, PS-3, PS-4, PS-5 | 4.15 and 5.3 |
| XVI. Recreation | 4.16 | | 4.16 |
| XVII. Transportation | 4.17 | | 4.17 and 5.4 |
| XVIII. Tribal Cultural Resources | 4.18 | TCR-1, TCR-2, TCR-3 | 4.18 |
| XIX. Utilities and Service Systems | 4.19 | | 4.19 |
| XX. Wildfire | 4.20 | | 4.20 |

4.1 AESTHETICS

Potential impacts to Aesthetics were fully evaluated in Section 4.1 of the 2022 Initial Study in accordance with the Section I of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *I.a) Have a substantial adverse effect on a scenic vista?*
- *I.b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*
- *I.c) In nonurbanized 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 a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*
- *I.d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The Project is located along Huntington Drive in the Project area which is not considered a “scenic vista.” However, motorists traveling along Huntington Drive in the Project vicinity can enjoy an aesthetically pleasing driving experience offered by the wide, grassy, tree-lined median, the tall trees and shrubs that hide residential uses on the north side, and the residential and commercial uses on the south side that are partially obscured by mature trees in the sidewalk. The Crowell Library and Huntington School, which are adjacent to the SMC on the east and west, are both similar architectural styles of Spanish Mediterranean with stucco and wood accents that complement the mature trees within the landscape. The SMC, however, is clearly architecturally different than the adjacent buildings, therefore, there is a visible variation in the continuity of the aesthetically pleasing driving experience in the immediate area of the Project.

The façade updates proposed by the Project seek to reduce the visual variation along the south side of Huntington Drive by modifying the SMC exterior to create a similar look and feel as that of the Crowell Library and Huntington School. The views of the south side of Huntington Drive will be temporary disrupted during construction.

The Proposed Project Site is located in an urbanized area and is zoned R-1 (very low density residential), and the adjacent public buildings (library and school) are within the same zoning designation. The site’s

zoning and use are consistent with the City’s applicable zoning and other regulations. The Project would not increase the height or density of development in the area.

The Project will only upgrade existing exterior lighting, and no new lighting is proposed.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.2 AGRICULTURE AND FORESTRY

Potential impacts to Agriculture and Forestry Resources were fully evaluated in Section 4.2 of the 2022 Initial Study in accordance with the Section II of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*.

There are no agricultural uses on the Project site, nor is the site zoned for agricultural use. There are no impacts, and no further analysis or mitigation is required.

4.3 AIR QUALITY

Potential impacts to Air Quality were fully evaluated in Section 4.3 of the 2022 Initial Study in accordance with the Section III of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The benchmark criteria addressed are as follows:

- *III.a) Conflict with or obstruct implementation of the applicable air quality plan?*
- *III.b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*
- *III.c) Expose sensitive receptors to substantial pollutant concentrations?*
- *III.d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?)*

The Air Quality analysis in Appendix B of the 2022 Initial Study (located in Appendix F of this DEIR) modeled construction emissions for demolition (which primarily includes roof replacement, window removal and replacement, porch post replacement, and exterior stucco removal and replacement), building construction and architectural coating application based on the overall scope of the proposed Project and construction phasing which is expected to commence in fall/winter 2022 and extend through mid-2023. The total area disturbed as a result of the Project would be limited to the building interior and exterior landscape and hardscape. For modeling purposes, it was assumed the Project would comply with SCAQMD Rules. The results of the modeling found that SCAQMD pollution thresholds would not be exceeded during construction or operations.

Potential sources of odor during construction activities include equipment exhaust. The objectionable odors that may be produced during the construction process would occur periodically and end when construction is completed.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.4 BIOLOGICAL RESOURCES

Potential impacts to Biological Resources were fully evaluated in Section 4.4 of the 2022 Initial Study in accordance with the Section IV of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *IV.a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- *IV.b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- *IV.c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means*
- *IV.d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
- *IV.e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

There are no sensitive species, riparian areas or wetlands on the Project site.

The Project site contains a number of trees, several of which are considered heritage trees under the City of San Marino tree preservation ordinance as contained in Chapter 23, Article 19 of the City Municipal Code. The trees also serve as potential habitat for nesting birds, protected by the Migratory Bird Treaty Act. The Proposed Project will not remove the trees, but some tree trimming and utility trenching may occur around the trees. As such **Mitigation Measures BIO-1 and BIO-2** are required to conduct nesting bird surveys prior to tree trimming, and for the City to work with an arborist during construction to assist in reducing impacts to the tree roots during trenching. Implementation of these measures reduces potential impacts to less than significant.

All impacts were determined to be less than significant with Mitigation Measures BIO-1 and BIO-2, and no further analysis is required.

4.5 CULTURAL RESOURCES – ARCHAEOLOGY AND HUMAN REMAINS

Potential impacts to Cultural Resources were fully evaluated in Section 4.5 of the 2022 Initial Study in accordance with the Section V of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *V.a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?*
- *V.b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?*
- *V.c) Disturb any human remains, including those interred outside of formal cemeteries?*

For threshold V.a, the 2022 Initial Study identified a Potentially Significant impact which could not be easily mitigated. Therefore, this specific threshold is further analyzed in this DEIR in section 5.1 below.

With respect to threshold V.b, the 2022 Initial Study identified that there were no known archaeological resources within or underlying the Project site. However, to accommodate for the potential for the unanticipated discovery of archaeological resources during utility trenching, **Mitigation Measure CUL-1** would be implemented to reduce this specific impact to less than significant.

With respect to threshold V.c, the Project contractor is required to comply with Public Resources Code Section 5097.98 (b), which requires that remains shall be left in place and free from disturbance until a final decision as to the treatment and their disposition has been made; therefore, there impacts were identified as less than significant, and no mitigation is required.

4.6 ENERGY

Potential impacts to Energy Resources were fully evaluated in Section 4.6 of the 2022 Initial Study in accordance with the Section VI of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *VI.a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- *VI.b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The 2022 Initial Study quantified energy usage during construction and operations. It determined that the energy usage during construction would be temporary, and construction equipment used would be typical of similar-sized construction projects in the region. In the interest of cost efficiency, construction contractors are not anticipated to utilize fuel in a manner that is wasteful or unnecessary. Therefore, Project construction would not result in a potential impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and no construction-related energy impact would occur. The Project upgrades include installation of energy efficient components, such as light fixtures and energy-efficient heating and air conditioning, to reduce energy usage during operations.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.7 GEOLOGY AND SOILS

Potential impacts to Geology and Soils were fully evaluated in Section 4.7 of the 2022 Initial Study in accordance with the Section VII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *VII.a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Alquist Priolo fault, seismic shaking, liquefaction, landslides.*
- *VII.b) Result in substantial soil erosion or the loss of topsoil?*
- *VII.c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*
- *VII.d) Be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial risks to life or property?*
- *VII.e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

- VII.f) *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The Project is located in Southern California, a seismically active area and susceptible to the effects of seismic activity include rupture of earthquake faults. The Project is not located on or near a Alquist-Priolo Earthquake fault, although the Raymond Fault Zone is documented approximately 0.5 mile to the north, in Lacy Park. All proposed improvements would comply with the latest seismic provisions of all applicable building codes designed to reduce impacts from earthquakes.

The City of San Marino's *Local Hazard Mitigation Plan* (CSM, Feb 2019) identifies that the City is not subject to liquefaction, and the surrounding area is flat, and there is no potential for landslides.

The Project does not require earth moving, except for shallow utility trenches, therefore, soil susceptible to erosion would not occur.

With respect to paleontological features, none are anticipated to be discovered during utility trenching. However, **Mitigation Measure CUL-1** which addresses procedures for discovery of unanticipated buried resources, was determined to be sufficient to reduce any potential impacts to less than significant.

All impacts were determined to be less than significant with Mitigation Measure CUL-1, and no further analysis or mitigation is required.

4.8 GREENHOUSE GAS

Potential impacts to Greenhouse Gas emissions were fully evaluated in Section 4.8 of the 2022 Initial Study in accordance with the Section VIII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- VIII.a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- VIII.b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The 2022 Initial Study identified that the applicable plan for the proposed Project is the SCAQMD's Tier 3 thresholds which used Executive Order S-3-05 goal as the basis for deriving the screening level. Both construction and operational levels were identified to not exceed the SCAQMD 3,000 metric ton annual threshold.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

Potential impacts to Greenhouse Gas emissions were fully evaluated in Section 4.9 of the 2022 Initial Study in accordance with the Section IX of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

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

- IX.b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- IX.c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- IX.d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- IX.e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- IX.f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- IX.g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?

The Project site is not located within or near a hazardous waste site. It is however situated adjacent to the Huntington Middle School and shares a parking lot with that school. The Valentine Elementary School is adjacent to the west of the middle school.

Construction activities will include the removal of asbestos and various construction activities during school hours. **Mitigation Measure HAZ-1** was identified to stop work if additional asbestos materials are found after abatement.

Mitigation Measures HAZ-2 and HAZ-3 require the development of safety plans during construction and operations to ensure student safety during construction, as well as during a potential evacuation of either the SMC or the school during operations because of the shared parking lot arrangement.

All impacts were determined to be less than significant with Mitigation Measures HAZ-1, HAZ-2 and HAZ-3, and no further analysis or mitigation is required.

4.10 HYDROLOGY AND WATER QUALITY

Potential impacts to Hydrology and Water Quality were fully evaluated in Section 4.10 of the 2022 Initial Study in accordance with the Section X of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- X.a) Violate any water quality standards or waste discharge requirements?
- X.b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- X.c) 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: increase erosion, increase surface water runoff, contribute runoff that exceeds existing storm drain capacity or contributes to polluted runoff.
- X.d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation??
- X.e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The 2022 Initial Study identified that the Proposed Project is not located within or near a stream that or a 100-year floodplain. The Project does not involve mass grading, therefore, water quality would not be

affected. Water usage for operations after completion is anticipated to be similar to existing operations, therefore, the Proposed Project will not impact groundwater supplies.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.11 LAND USE AND PLANNING – PHYSICALLY DIVIDE A COMMUNITY

Potential impacts to Land Use and Planning were fully evaluated in Section 4.11 of the 2022 Initial Study in accordance with the Section XI of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *XI.a) Physically divide an established community?*
- *XI.b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

With respect to XI.a), the 2022 Initial Study identified no impacts because there are no physical or zoning features of the Proposed Project that would divide the community. No impacts were identified, and no further analysis is required.

However, for XI.b), which analyzes Project conflicts with land use plans and policies, the 2022 Initial Study identified a Potentially Significant impact that could not be easily mitigated. Therefore, further analysis for this topic is provided in this DEIR in Section 5.2.

4.12 MINERAL RESOURCES

Potential impacts to Mineral Resources were fully evaluated in Section 4.12 of the 2022 Initial Study in accordance with the Section XII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The Project site is not located within an area of important mineral sources, nor would any aspect of the Project involve mining or use of mineral resources. No impacts were identified, and no further analysis or any mitigation is required.

4.13 NOISE

Potential impacts to Land Use and Planning were fully evaluated in Section 4.13 of the 2022 Initial Study in accordance with the Section XIII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *XIII.a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*
- *XIII.b) Generation of excessive groundborne vibration or groundborne noise levels?*
- *XIII.c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The primary main noise source during construction activities would be associated with demolition and construction of the proposed improvements. Exterior improvements requiring removal of concrete or

other hardscape materials would require the use of jackhammers and small tractors/bobcats to transport material to haul trucks.

Because the Project is located within a Residential (R)-1 zone, as stated above, Section 14.04.07 of the San Marino Municipal Code requires that equipment operation or outside construction and repair must not exceed 65 decibels (dB) when originating from any parcel in an R-1 Zone without a permit from the planning and building director.

Noise sensitive uses near the Project site include the Crowell Public Library which is located adjacent to and east of the SMC. Existing school buildings and single-family residences are located 200-300 feet west, south and east of the site. Based on the Project's noise study (refer to Appendix D in the 2022 Initial Study, located in Appendix F of this DEIR), construction and operational noise is anticipated to be greater than 95 dBA at the property line but will attenuate to less than 68 dB at 250 feet, or in the vicinity of the school and the residences.

Therefore, because the Project may exceed 65 dB at the property line, **Mitigation Measure NOI-1** is required to comply with the City's code for projects that exceed 65 dB at the property line. This mitigation measure requires the contractor to institute noise reduction best management practices during construction would reduce impacts to less than significant.

Ground-borne vibration levels in excess of 94 Vibration Velocity Level (VdB) would damage buildings extremely susceptible to vibration damage. The SMC building is included on the California Register of Historic Places and eligible for inclusion in the National Register of Historic Places; and thus, may be susceptible to vibration damage. However, no construction activities with the potential to generate significant ground vibration above 94 VdB, would be required to complete the proposed improvements. Based on the analysis in the 2022 Initial Study, vibration levels would not reach or exceed levels required to cause any structural damage or related impacts to the SMC or adjacent Crowell Public Library. Additionally, vibration levels would be below the 72 VdB threshold required to be perceptible at neighboring residences.

All impacts were determined to be less than significant with Mitigation Measure NOI-1, and no further analysis or mitigation is required.

4.14 POPULATION AND HOUSING

Potential impacts to Population and Housing were fully evaluated in Section 4.14 of the 2022 Initial Study in accordance with the Section XIV of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *XIV.a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*
- *XIV.b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

The Proposed Project is to improve the SMC which serves the recreational needs for the citizens of the city. The Project would not provide housing or make other infrastructure improvements. Therefore, the proposed Project would not induce population growth. The Project does not involve the removal or replacement of housing.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.15 PUBLIC SERVICES – POLICE, FIRE, LIBRARY

Potential impacts to Public Services were fully evaluated in Section 4.15 of the 2022 Initial Study in accordance with the Section XV of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The threshold requires an analysis of various public services such as fire protection, police protection, schools, recreation/parks, and other public facilities as follows:

XV.a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection, Police protection, Schools, Recreation/Parks, Other public facilities?

The Proposed Project is located within 0.5 mile of City police and fire services. No expansion of emergency services is anticipated because the Project is a remodel of an existing building. And though one of the goals and objectives of the Project is to increase the usage of the SMC through providing a more modern facility, the amount of increase of water and wastewater is not significant because the increased use will be temporary and intermittent.

With respect to schools, the Proposed Project will not increase population growth. Therefore, there is no need for additional schools. Because parking for the SMC is within the Huntington Middle School parking lot through a parking agreement with the SMUSD, the 2022 Initial Study evaluated the potential effects of concurrent events when both the SMC and the Huntington Middle School may hold large events at the same time (such as a wedding or conference at the SMC at the same time as an athletic event at the school) to determine if the operation of the SMC would reduce the ability of the school to operate its programs. Following an analysis, feasible mitigation measures were developed to ensure coordination between the City and the Huntington Middle School to reduce the potential for conflicts that may interfere with the school's ability to provide services, thereby necessitating additional parking facilities. All impacts were determined to be less than significant once mitigation was incorporated.

However, comments were received during the NOP scoping that requested more information on the topic of impacts to schools given that there is a shared parking agreement. Therefore, additional discussion and analysis on potential impacts to Schools is provided in Section 5 of this DEIR based on comments received during the NOP scoping process.

4.16 RECREATION

Potential impacts to Recreation were fully evaluated in Section 4.16 of the 2022 Initial Study in accordance with the Section XVI of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The threshold requires an analysis of various public services such as fire protection, police protection, schools, recreation/parks, and other public facilities as follows:

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

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

The Project does not propose any residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks, or other recreational facilities, including the SMC. The Project will improve an existing community center and will not expand the SMC or construct new recreational facilities.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.17 TRANSPORTATION

Potential impacts to Transportation were fully evaluated in Section 4.17 of the 2022 Initial Study in accordance with the Section XVII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *XVII.a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- *XVII.b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*
- *XVII.c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- *XVII.d) Result in inadequate emergency access?*

With respect to XVII.a), the 2022 Initial Study identified that the Proposed Project was consistent with the City's General Plan which addresses the circulation system. No mitigation was required. However, commenters during the NOP process requested that the DEIR provide additional explanation and analysis for this threshold. Therefore, this specific threshold is further discussed in Section 5 of this DEIR.

With respect to XVII.b), the 2022 Initial Study identified that the proposed Project meets the criteria to be screened out of vehicles miles traveled (VMT) analysis as it will serve the local population and is considered a community institution, thereby shortening travel distances and reducing VMT. No mitigation was required. However, commenters during the NOP process requested that the DEIR contain additional explanation and analysis for this threshold. Therefore, this specific threshold is further analyzed in Section 5 of this DEIR.

With respect to XVII(c), the 2022 Initial Study identified that Project improvements occur solely off highway and no road improvements are planned. Traffic may be temporarily slowed or diverted around the work site during utility installation, but all State traffic controls would be in place for the time of any construction that must occur in the street. There was no impact, and no further analysis or any mitigation is required for this criterion.

With respect to XVII.d), all access lanes will meet City requirements pursuant to the Uniform Building and Fire Code to ensure adequate emergency access throughout the Project site. The impacts were determined to be less than significant, and no further analysis or any mitigation is required for this criterion.

4.18 TRIBAL CULTURAL RESOURCES

Potential impacts to Tribal Cultural Resources were fully evaluated in Section 4.18 of the 2022 Initial Study in accordance with the Section XVIII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *XVIII.a) 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*
- *XVIII.b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

A Native American Heritage Commission (NAHC) search of its Sacred Lands and a tribal consultation were completed as part of the 2022 Initial Study. The NAHC responded stating that the search of its Sacred Lands File revealed positive results and to contact the Gabrieleno Band of Mission Indians – Kizh Nation.

Following consultation with the Kizh Nation that identified that there are no known resources on the Project site but there is high potential for buried resources, **Mitigation Measures TCR-1, TCR-2, and TCR-3** were imposed. These measures consist of tribal monitoring during the utility excavations, and procedures for potential finds.

All impacts were determined to be less than significant with Mitigation Measures TCR-1, TCR-2 and TCR-3, and no further analysis or additional mitigation is required.

4.19 UTILITIES AND SERVICE SYSTEMS

Potential impacts to Utilities and Service Systems were fully evaluated in Section 4.18 of the 2022 Initial Study in accordance with the Section XVIII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *XVIII.a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- *XVIII.b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*
- *XVIII.c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*
- *XVIII.d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- *XVIII.e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The SMC is served by all existing utilities. Minor modifications of the utilizes planned as part of the Project include replacing the overhead electrical service with an underground electrical service, including a minor electrical upgrade to today's standards, and a new landscaping water service and meter to replace the existing irrigation lines. Additional water lines will be run to service the new fire sprinkler system. These

upgrades are minor modifications and do not represent a significant increase over service capacity that is currently provided.

Usage of water, wastewater and landfill services may slightly exceed current demand with the anticipated increase in usage and recreational staff offices, however, utility providers are anticipated to have adequate supply to serve this minor incremental demand.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

4.20 WILDFIRE

Potential impacts to Wildfire were fully evaluated in Section 4.20 of the 2022 Initial Study in accordance with the Section XX of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The thresholds addressed are as follows:

- *XX.a) Substantially impair an adopted emergency response plan or emergency evacuation plan?*
- *XX.b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?*
- *XX.c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*
- *XX.d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The Proposed Project is not located within a very high fire hazard severity zone as identified CalFire or the City of San Marino. The nearest potential wildfire area is located approximately 3 miles east in the Kewen Canyon/Kewen Drive area. The San Marino Police Department, California Highway Patrol, and other cooperating law enforcement agencies have primary responsibility for evacuations, and the SMC may be used as an evacuation center if needed.

All impacts were determined to be less than significant, and no further analysis or any mitigation is required.

5 ENVIRONMENTAL IMPACTS ANALYSIS

Pursuant to CEQA Guidelines (14 CCR 15000 et seq.), this DEIR consists of an evaluation of the effects of the entire Proposed Project. In the evaluation of all impacts of the Proposed Project for this DEIR, the analysis contained in the 2022 Initial Study is incorporated by reference and forms the basis for summarizing information where appropriate in this DEIR.

The CEQA Guidelines, *Appendix G - Environmental Checklist Form*, criteria were used in the 2022 Initial Study evaluation. For brevity, this section summarizes the issues addressed in the 2022 Initial Study.

Of the 20 categories addressed in the 2022 Initial Study, criteria in two categories (Cultural Resources and Land Use and Planning) were determined to be Potentially Significant with no feasible mitigation measures to reduce impacts to less than significant. Criteria in two other categories, Transportation and Public Services, are included in this DEIR in response to comments received during the NOP/scoping process.

Table 5-1: CEQA Checklist and Initial Study Matrix – Significant Effects identifies the specific CEQA Checklist criteria and 2022 Initial Study sections that are the subject of the environmental evaluation of this DEIR section.

Table 5-1: CEQA Checklist and Initial Study Matrix – Significant Effects

| CEQA Guidelines Checklist Section and Criteria Issue Summary | Initial Study Section | Initial Study Finding | Mitigation Measures in Initial Study to Reduce Impacts to Less Than Significant | DIER Section |
|---|-----------------------|--|---|--------------|
| V. Cultural Resources (a) Significant impact on listed Historical Resources | 4.5 | Potentially Significant | No feasible mitigation measures. | 5.1 |
| XI. Land Use and Planning (b) Conflict with any land use plan, policy, or regulation. | 4.11 | Potentially Significant | No feasible mitigation measures. | 5.2 |
| XV. Public Services: Schools: Require new or altered facilities to maintain acceptable level of service. | 4.15 | Less Than Significant With Mitigation Incorporated | PS-1, PS-2, PS-3, PS-4, PS-5 | 5.3 |
| XVII. Transportation (a) Conflict with a program, plan, ordinance or policy addressing the circulation system. (b) Be inconsistent with Vehicle Miles Traveled analysis | 4.17 | Less Than Significant | No mitigation measures required to reduce potential impacts. | 5.4 |

5.1 CULTURAL RESOURCES

5.1.1 Introduction

For this subject area, the 2022 Initial Study (Appendix F) analysis indicated that potential Project impacts to the threshold criteria of archaeological resources and human remains were considered less than significant, and no further evaluation was warranted. However, the 2022 Initial Study analysis concluded that for the threshold criterion of historic resources, the Project could potentially have a significant unavoidable impact because the Proposed Project would alter an identified historic resource. Therefore, this section focuses the analysis on impacts to historic resources.

Cultural resources include archaeological sites, buildings and other kinds of structures, historic districts, cultural landscapes, and resources important to specific ethnic groups.

Archaeological sites represent the material remains of human occupation and activity either prior to European settlement (prehistoric sites) or after the arrival of Europeans (historical sites).

The historic built environment includes buildings used for habitation, work, recreation, education and religious worship, and may be represented by houses, factories, office buildings, schools, churches, museums, hospitals, bridges and other kinds of structures.

An historic district is any “geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history” (36 CFR 60.3).

The National Park Service defines a cultural landscape as “a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values”.

5.1.2 Regulatory Setting

The National Historic Preservation Act (NHPA) of 1966, as amended, and the California Public Resources Code (PRC), Section 5024.1, are the primary federal and state laws and regulations governing the evaluation and significance of historical resources of national, state, regional, and local importance.

National Historic Preservation Act

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. The Advisory Council on Historic Preservation, an independent federal agency, administers the Section 106 review process with assistance from State Historic Preservation Offices to ensure that historic properties are considered during federal project planning and implementation. In June 2011, the SMC underwent a Section 106 review as part of a project to install an ADA compliant door and other features, which was funded through the U.S. Department of Housing and Urban Development through the County of Los Angeles Community Development Block Grant program.

National Register of Historic Resources (National Register)

The National Register of Historic Places is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The National Register recognizes resources of local, state and national significance which have been documented and evaluated according to uniform standards and criteria.

Authorized under the NHPA, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archeological resources. The National Register is administered by the National Park Service, which is part of the U. S. Department of the Interior.

As defined in National Register Bulletin #15, "How to Apply the National Register Criteria for Evaluation," resources are eligible for the National Register if they:

- A) are associated with events that have made a significant contribution to the broad patterns of our history; or
- B) are associated with the lives of significant persons in or past; or
- C) embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D) have yielded or may be likely to yield, information important in history or prehistory.

Once a resource has been determined to satisfy one of the above-referenced criteria, then it must be assessed for integrity. Integrity refers to the ability of a property to convey its significance, and the degree to which the property retains its integrity, including physical and visual attributes, for which it is significant under the four basic criteria. The National Register recognizes seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association. To retain its historical integrity, a property must possess several, and usually most, of these aspects.

California Register of Historical Resources

The California Register program encourages public recognition and protection of resources of architectural, historical, archeological and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for state historic preservation grant funding and affords certain protections under the California Environmental Quality Act

The California Register was established to serve as an authoritative guide to the state's significant historical and archaeological resources (Public Resources Code § 5024.1). The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation (DPR), implements the policies of the NHPA on a statewide level.

State law provides that in order for a property to be considered eligible for listing in the California Register, it must be found by the Office of Historic Preservation (OHP) to be significant under any of the following four criteria (14 Cal. Code of Regulations § 4852 (a)):

- 1) It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- 2) It is associated with the lives of persons important to local, California, or national history;
- 3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; and/or
- 4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (14 Cal. Code of Regulations § 4852 (d)(2).) Fifty years is normally considered sufficient time to be considered a potential historical resource. All resources older than 45 years will be evaluated.

The California Register also requires that a resource possess integrity, which is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

All resources listed on or formally determined eligible for the National Register are automatically listed in the California Register, in accordance with the California Office of Historic Preservation policies (OHP, March 2001). In addition, properties designated under municipal or county ordinances or through local historic resources surveys, are eligible for listing in the California Register.

City of San Marino Local Register of Historic Resources

Chapter XXIII, Article 18 of the San Marino City Code is designed to "*promote the public health, safety, and general welfare by providing for the identification, designation, protection, enhancement, and ongoing use of historical resources that represent the City's cultural, architectural, social, economic, and political heritage.*"

Chapter XXIII, Article 18 of the San Marino City Code, Section 23.18.03 (A) states: "*Automatic Designation: Any property within the City that is listed in the National Register of Historic Places or the California Register of Historic Places is automatically designated as a historic landmark for purposes of this article.*"

5.1.3 Environmental Setting

This section provides a summary of the information provided in the 2022 Initial Study and in the Project Cultural Resources Assessment (refer to Appendix C of the 2022 Initial Study, located in Appendix F of this DEIR).

History

The first significant European settlement of California began during the Spanish Period (1769 to 1821) when 21 missions and four presidios were established between San Diego and Sonoma. The land of the City of San Marino, which was part of the San Gabriel Mission, was initially occupied by Gabrielino (Tongva) Indians, who had a village located on what is now the Huntington School.

In 1852, Tennessee native Benjamin Davis Wilson acquired a vast tract of land that included the area that later became San Marino as well as several neighboring towns. In 1873, Benjamin Wilson gave 500 acres of his land to his son in law James Debarth Shorb, who then named the ranch on his land “San Marino” which was inspired by his grandfather’s plantation in Maryland which in turn got its name from the Republic of San Marino, Italy.

In 1903, the San Marino land was purchased from James Shorb by Henry E. Huntington, a businessman who was the owner of the Pacific Electric Railway Company in Southern California. Henry Huntington played a major role in shaping the economy of Southern California. Huntington and George Patton Sr. joined with another landowner to incorporate San Marino in 1913. They also spearheaded a campaign to prevent their properties from being developed by the city.

In 1904, Pacific Electric (PE), which was owned by Henry Huntington, built a double track rail line commencing at a connection with the Monrovia Line at Huntington Drive in San Marino northerly on private way to a point near Colorado Street, Pasadena. The line opened for service on March 19, 1904.

The city’s irregular street grid pattern reflects its historic patterns of residential development, which were largely guided by Huntington and oriented around the Pacific Electric Railway (PERy) routes he constructed in the City between 1903 and 1906. Most of the street grid skews northwest/southeast, roughly perpendicular to the northeast/southwest route of Huntington Drive (the PERy’s Monrovia-Glendora route). The grid in the northeast portion of the city is skewed in response to the PERy’s Sierra Madre line (now Sierra Madre Boulevard). The northwest part of San Marino, containing the most prominent hills and the largest lots, is marked by curvilinear streets responding to the natural contours of the landscape (ARG, 2020).

Rail operation continued until October 6, 1950, when the line was abandoned in favor of motor coaches. The median of what is now Huntington Drive was part of this line and was developed with grass and trees after the PERy’s abandonment. The roadways on either side of the median were reconfigured from bidirectional traffic to one-way traffic.

San Marino Women’s Club

During the 1930s, there were many organizations in the community in San Marino that gathered for music, book reviews, and various other activities. However, there were few organizations for women. On June

8th, 1936, a group of 52 women gathered at the San Marino Police Department courtroom to organize a local women's club. By the time the San Marino Woman's Club was completely organized, the club already had around 420 members (San Marino Tribune, January 7, 2016). The club catered to elite married white women who could afford to pay the \$10 dues and had time to attend frequent events and do charity work. Most of these women had live-in domestic help in the 1930s and 1940s; those who took on leadership roles were in their forties and fifties, with grown or nearly-grown children.

The San Marino Woman's Club members were required to wear black dresses and black hats with a pair of white gloves. There were 16 different guilds within the club: music, drama, literature, writers, home craft, philanthropy, foreign language, current events, travel, bible, home interior, language, sports, public affairs, flower, and garden. Regular meetings were held at the Henry E. Huntington Middle School auditorium while the guild meetings were held at homes of the members. The club raised funds for a slightly used ambulance, which it donated to the city in 1940. This was just one of many charitable contributions the group made to the community over the decades.

In 1939, the club purchased the property at 1800 Huntington Drive for \$6,000 to build a clubhouse for its growing membership. At the time, the property held a residence and was surrounded by open fields. Members raised most of the funds to complete the clubhouse through bazaars, rummage sales, parties, and various entertainment events over a 10-year period. Fundraising efforts were suspended when the US entered World War II in 1942, and construction remained difficult immediately after the war in the late 1940s. They also made an appeal to the public for funds. In 1949, the club requested and received variances from San Marino City Council because the parcel was zoned for residential use and required setbacks that did not fit in with the club's plans for the property. By the end of the decade, the club had \$57,000 on hand, and was able to borrow an additional \$35,000 in 1951 to construct the clubhouse, which was completed in 1952.

In addition to club meetings and events, the facility was used for a variety of community and private functions such as wedding receptions and sorority events. Over the years, the club's charitable contributions were numerous and included the endowment of a bed at the Orthopedic Hospital, nursing scholarships, Toys for Tots, and others. They also provided help to the Assistance League, American Red Cross and the City of Hope.

The San Marino Woman's Club moved its organization to Pasadena in 2004, and the City purchased the building in 2005.

Project Site Area Development

The SMC was constructed in approximately 1951/52. Adjacent to the SMC are the Crowell Library (east) which was constructed in 1951/52, at about the same time as the construction of the SMC. The Henry E. Huntington Middle School (constructed in 1918) is located directly west and south of the SMC, and the Valentine Elementary School (west of the middle school), constructed in 1938, and the San Marino Unified School District offices, located within the middle school grounds. The Crowell Library was reconstructed to its current design between 2006 and 2008.

Cultural and Archaeological Resources Study and Results

For the 2022 Initial Study, BCR Consulting conducted a survey of the Project site through a field survey and a records search (refer to Appendix C of the 2022 Initial Study, located in Appendix F of this DEIR). The records search was conducted at the South Central Coastal Information Center and through review of various other State, federal and local databases for the Project site and a 1-mile radius.

The records search revealed that in June 2011 the SMC underwent a required historical review as part of a project to install an ADA compliant door and other features, which was being funded through the U.S. Department of Housing and Urban Development through the County of Los Angeles Community Development Block Grant program.

The SMC's architectural style was identified in the 2011 study as "Modern Colonial Revival," which is not recognized as a unique style of architecture. Designed by architect Marion Varner as one of his earlier designs, the SMC large primarily one-story building with a flat roof and raised parapet along the rear and side elevations. The front elevation features a side-facing medium gable roof with an offset front gable wing. An L-shaped porch runs across the front elevation and is supported by decorative wrought iron posts. The roof is covered with wood shingles. A large multi-paned steel framed window is located below the main front gable. Underneath the window is brick trim. A tall exterior brick chimney is located on the northeast elevation. Windows are primarily multi-paned steel casements. Siding is stucco and foundation is concrete. The interior of the building when first built contained a large auditorium, dining room, meeting room and office. There were two additions in 1958 and a separate modular building in rear, constructed at an unknown date.

The 2011 study identified that the integrity of the building appeared sufficient for eligibility to the National Register of Historic Places as follows:

- Location: The property at 1800 Huntington Drive is in its original location.
- Setting: The historic setting of the property was found to be partially intact. The relationship to the adjacent library and school remain. However, the original 1950 library was replaced with a new library building within the last several years.
- Design: The original design of the 1952 building was primarily intact except for changes to the front entrance doors and two small additions in 1958 done in the same style.
- Materials: The integrity of materials was found to be somewhat intact.
- Feeling and Association: The feeling and association as a woman's club was no longer intact since the building is now the San Marino Community Center, but it continues to function to serve the community.

The California OHP concurred with this recommendation on August 5, 2011 and also formally listed the SMC in the California Register of Historical Resources (California Register) under Criterion 1, for association with an event important to the history of the San Marino community. The OHP identifies the SMC as being listed on the California Register through its listing on the State's Built Environment Resource Directory (BERD).

During the 2021 fieldwork, BCR Consulting confirmed that that the SMC retained the integrity to convey its historic significance as identified in 2011. No other cultural or archaeological resources were identified within the subject property boundaries.

5.1.4 Thresholds of Significance

Potential impacts to Cultural Resources were fully evaluated in Section 4.11 of the 2022 Initial Study in accordance with the Section V of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The threshold addressed in this DEIR is as follows:

- *V.a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?*

5.1.5 Impact Analysis

Section 15064.5(a) of the CEQA Guidelines defines historical resources, which includes: *A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).*

Public Resources Code Section 5020.1(q) defines “Substantial adverse change” as the demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired. CEQA Guidelines Section 15064.5 (b)(1) and (b)(2) clarify that the impairment must be material and states that material impairment of a historical resource would occur when the Project “demolishes or materially alters, in an adverse manner, those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.”

The SMC was formally listed in the California Register of Historical Resources (California Register) under Criterion 1, for association with an event important to the history of the San Marino community. The OHP identifies the SMC as being listed on the California Register through its listing on the State’s BERD.

The SMC is also a City landmark pursuant to the San Marino City Code, Chapter XXIII, Article 18 Section 23.18.03 (A) “Automatic Designation.”

The Project includes changing the exterior architectural design of the SMC building to better match the architectural style of the adjacent Crowell Public Library, Henry E. Huntington Middle School and San Marino Unified School District offices. For example, the existing wood shake roof would be replaced with tile, and the decorative wrought iron posts would be changed to stucco columns. The SMC will remain a community center, open for community events, club meetings, City recreation staff offices, and City recreation classes.

Because the SMC is eligible for listing to the National Register, is listed on the California Register of Historic Resources; and is therefore automatically considered a City landmark, CEQA Guidelines Section 15064.5(b)(3) states that a project that follows the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995), Weeks and Grimmer (referred to as “Secretary’s Standards”), “shall be considered as mitigated to a level of less than a significant impact on the historical resource.” The Secretary’s Standards are intended to pertain to rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

Additionally, San Marino City Code Section 23.18.08 discusses procedures for the City to issue a Certificate of Appropriateness for rehabilitation of historic structures. One requirement is that the project is consistent with the Secretary's Standards and any applicable design guidelines adopted by the City.

The 2022 Initial Study determined that the Proposed Project does not qualify as a preservation or rehabilitation project under the Secretary's Standards as currently designed (refer to the Section 4.5 Cultural Resources of the 2022 Initial Study and Appendix C of the 2022 Initial Study, both of which are located in Appendix F of this DEIR). As identified in the 2022 Initial Study, the proposed Project would materially alter a number of the physical characteristics of the SMC that convey its historical significance and that justify its inclusion in the California Register of Historical Resources. Therefore, the proposed Project, as currently designed, will cause a substantial adverse change in the significance of a historical resource.

5.1.6 Mitigation Measures

The CEQA Guidelines Section 15126.4(b) addresses impacts to historical resources and mitigation alternatives as follows:

(1) Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.

(2) In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur.

Mitigation Measure CUL-1 was identified in the 2022 Initial Study to accommodate unanticipated archaeological and paleontological finds. Therefore, the Proposed Project would require implementation of **Mitigation Measures CUL-2, CUL-3, and CUL-4** as follows to address impact to historical resources.

CUL-2: Documentation. Prior to the issuance of demolition or site permits, the project sponsors shall undertake Historic American Building Survey (HABS) documentation of the subject property, structures, objects, materials, and landscaping. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The documentation shall consist of the following:

- **Measured Drawings:** A set of measured drawings that depict the existing size, scale, and dimension of the subject property. The Planning Department Preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (plan, section, elevation, etc.). The Planning Department Preservation staff will assist the consultant in determining the appropriate level of measured drawings;

- **HABS-Level Photography:** Digital photographs of the interior and the exterior of subject property. Large format negatives are not required. The scope of the digital photographs shall be reviewed by Planning Department Preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service Standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography; and
- **HABS Historical Report:** A written historical narrative and report, per HABS Historical Report Guidelines.
- **Video Documentation:** Video footage of the exterior and interior of contributing elements of the subject property.

The professional shall prepare the documentation and submit it for review and approval by the Planning Department Preservation staff prior to Project construction. The documentation shall be deposited to local historical repositories including but not limited to Pasadena Museum of History.

CUL-3: Interpretation. The City shall provide a permanent display of interpretive materials within the SMC concerning the history and architectural features of the original SMC building and its relationship with the City of San Marino's history. Interpretation of the site's history and relationship with the City shall be supervised by an architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards and may engage additional consultants to develop the display. The interpretative materials (which may include, but are not limited to, a display of photographs, news articles, memorabilia, and/or video) shall be placed in a prominent setting within the SMC, such as the lobby or Fireside Room of improved building. A proposal describing the general parameters of the interpretive program shall be approved by the City of San Marino Community Development Department staff prior to occupancy.

CUL-4: Salvage. Prepare an in-depth salvage document for the character-defining features of the SMC. The City shall work with a professional who meets the Secretary of Interior's Standards to develop a salvage report that documents the building's character-defining features for conservation and assesses the feasibility of reinstallation at the SMC or in other City facilities. The salvage report shall include documentation of interior and exterior historic character-defining features that would not be retained by the Project. The professional shall prepare the salvage report and submit it for review and approval by the Community Development Department staff prior to the initiation of Project construction.

5.1.7 Level of Significance After Mitigation

CEQA Guidelines Section 15126.4(b)(2) states that completion of historic narratives, photographs or architectural drawings does not mitigate the impacts to less than significant. This is because the proposed Project is similar to a demolition type project in that it will remove building features that convey its historical significance in accordance with its listing on the California Register of Historic Resources.

Therefore, even with the implementation of the mitigation measures CUL-2, CUL-3 and CUL-4, the impact to historic resources would not be reduced to a less than significant level.

Therefore, the Proposed Project, as currently designed, will cause a substantial adverse change in the significance of a historical resource because the Project will materially demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources, as identified in CEQA Guidelines Section 15064.5 (b)(1) and (b)(2).

The level of significance of the impact to historic resources is Potentially Significant after mitigation is incorporated.

Statement of Overriding Considerations

The City has the discretion to balance the benefits of a project against its unavoidable significant environmental impacts in considering whether to approve a project under CEQA. The City may approve a project with significant impacts if they adopt a Statement of Overriding Considerations finding that the project's benefits outweigh the unmitigated impacts. Project benefits may include economic, legal, social, and other considerations. Based on the identification of significant impacts to historic resources, the City would need to adopt a Statement of Overriding Considerations to approve the Proposed Project.

5.1.8 Cumulative Impacts

The City's General Plan identifies other facilities within the City of San Marino that have a State historic register designation. However, no improvements to those facilities are proposed that would create a cumulative impact to a historic resource. The Proposed Project impacts are limited to one resource. Therefore, the cumulative impact of materially altering a historical structure is less than significant, and no further analysis or mitigation is required.

5.2 LAND USE AND PLANNING

5.2.1 Introduction

For this subject area, the 2022 Initial Study (Appendix F) analysis indicated that there were no potential Project impacts to the threshold of the Project physically dividing a community, and no further evaluation was warranted. However, the 2022 Initial Study analysis concluded that for the threshold of if the Project conflicts with land use policies, the Project could have a potentially significant unavoidable conflict with the current General Plan goals and policies relative to preservation of a historic resource. Therefore, this section focuses the analysis on the Project's conflicts with land use policies.

5.2.2 Regulatory Setting

General Plan

The City's General Plan, adopted in October 2003, identifies Goals, Policies and Implementation measures that guide the City's actions. "Goals" represent a synthesis of input from those who live and work in the City of San Marino and define desired General Plan outcomes. "Policies" provide the overall direction for choosing among alternative courses of action necessary to achieve the Goals while also providing a measure of flexibility needed to adapt the action to changes over the life of the General Plan. "Implementation Measures" are specific, discreet actions the City may take to achieve the future conditions reflected in the General Plan element. Implementation Measures define the municipal work program for providing transportation improvements needed to meet Goals identified in the General Plan element, consistent with the element's policies.

City Ordinances

As discussed in DEIR Section 5.1, the California OHP identifies the SMC as being listed on the California Register through its listing on the State's BERD. The SMC is also considered a City Landmark pursuant to City of San Marino Municipal Code, Chapter XXIII, Article 18, Section 23.18.03 (A), which states: "*Automatic Designation: Any property within the City that is listed in the National Register of Historic Places or the California Register of Historic Places is automatically designated as a historic landmark for purposes of this article.*"

Chapter XXIII, Article 18, Section 23.18.07 of the San Marino City Code also identifies that no alteration, restoration, rehabilitation, construction, removal, relocation, or demolition of any historic landmark shall occur unless the City has first issued a Certificate of Appropriateness (Certificate) or Certificate of Economic Hardship. The Community Development Director can issue the Certificate with the following findings:

- a. The project will not cause a substantial adverse change in the significance of a historic landmark within the meaning of the California Environmental Quality Act as determined by the commission and the Council;*
- b. The project is consistent with the provisions of this article; and*
- c. The project is consistent with the Secretary's Standards and any applicable design guidelines adopted by the City.*

5.2.3 Environmental Setting

The Project site is located within the City limits and is zoned R-1, Residential. The Project proposes to improve an existing City building that is used for recreation. According to Section 23.02.01 of the San Marino Municipal Code, recreational and childcare activities may be conducted by the City of San Marino on properties in residential zones that are owned by the City.

The City acquired the building in 2005 from the San Marino Women’s Club to use for City recreation programs. In January 2018, the City Recreation Commission began holding public discussions and extensive public outreach regarding re-envisioning the City’s recreation program and enhancing the usage of the SMC. In 2018, the City Council adopted a strategic plan that identified developing a plan for the future of the SMC and appointed a “Blue Ribbon Committee” to evaluate the recreational programming. In August 2019, conceptual plans were developed for the SMC. Between August and September 2020, the City surveyed the community regarding the needs and aesthetic appearance of the SMC. One of the survey questions asked the community if the City should restore the original 1950s exterior architecture or remodel it to match other adjacent buildings. Of the 209 responses received, the results indicated:

| | |
|-------------------------------|----|
| • Restore 1950 's | 79 |
| • Match Crowell Library | 95 |
| • Match Barth Athletic Center | 4 |
| • Do something different | 10 |
| • No response | 21 |

The result of the outreach was that nearly equal portions of the community supported retaining the existing design or supported a more modern look. Given that there was no clear community consensus, the City Council, after deliberations, determined that redesigning the SMC to more closely align with the architectural style of the Crowell Public Library would more closely align with the overall City’s vision as identified in the General Plan, “to make our City more attractive, more desirable, and more responsive to the changing needs of its citizens.” An architect was retained to provide the current plans which represent the Proposed Project.

5.2.4 Thresholds of Significance

Potential impacts to Land Use and Planning were fully evaluated in Section 4.5 of the 2022 Initial Study in accordance with the Section XI of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The threshold addressed in this DEIR is as follows:

- *XI.b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

5.2.5 Impact Analysis

The Project proposes to make both exterior and interior improvements to the SMC, which is eligible for listing to the National Register of Historic Places, is on the California Register of Historical Resources, and which is a City Landmark under San Marino City Code, Chapter XXIII, Article 18 Section 23.18.03 (A). The exterior upgrades will change the existing architectural style of the building façade from “Modern Colonial

Revival” to a “Spanish Mediterranean” architectural style which is similar to that of the adjacent Crowell Public Library to the east and the San Marino Unified School District buildings to the west.

This analysis focuses on the proposed changes and determines whether they are a substantial change in land use policy that would substantially conflict with the intent of the City’s General Plan, and the City ordinances relative to qualifying for a Certificate of Appropriateness. Although this DEIR will make a determination regarding the significance of the changes from a CEQA standpoint, ultimately, the City will determine whether the Proposed Project complies with the requirements to obtain a Certificate of Appropriateness in accordance with City ordinance.

Land Use Consistency

The Project’s Land Use Designation is Very Low Density Residential. In 1949, the San Marino Women’s Club requested and received variances from San Marino City Council because the parcel was zoned for residential use and the required setbacks did not fit in with the club’s plans for the property as a community center. The Project will not change the land use or use of the building as a public gathering space as it has existed for decades. Moreover, according to Section 23.02.01 of the San Marino Municipal Code, recreational and childcare activities may be conducted by the City of San Marino on properties in residential zones that are owned by the City. Therefore, the Project is consistent with the City’s Land Use designation.

General Plan Consistency

When the Project is evaluated against the City’s goals and objectives of its General Plan and Circulation Element, the Project is generally consistent with the City’s Vision Statement, identified in the following excerpt from the General Plan:

The city government embraces the values of the community, and recognizes the need to make our City more attractive, more desirable, and more responsive to the changing needs of its citizens. Decision makers are accessible to residents. Although the City adapts to change in a deliberate way, its intent is to satisfy residents’ needs while protecting its financial resources.

Table 4.11-1 in the 2022 Initial Study (Appendix F) evaluated Project’s consistency with the various Goals and Policies of the various elements of the General Plan. For the purposes of Table 4.11-1 in the 2022 Initial Study, only those goals, policies and implementation measures that are applicable to the Project are identified.

In summary, Table 4.11-1 of the 2022 Initial Study identified the following:

- **Circulation Element:** Consistent.

- **General Plan - Land Use Chapter**
 - Section One - Land Use Designations - Consistent
 - Section Three – Preservation - **Inconsistent**

- **General Plan – Community Services Chapter**
 - Section One – Recreational Services: Consistent

- **General Plan – Safety Chapter**
 - Section Four – Noise: Consistent

In general, the General Plan’s Land Use Chapter, which includes Section Three – Preservation, identifies “Cultural Treasures” as The Huntington Library, Art Collections, and Botanical Gardens, The Old Mill, and Lacy Park. The General Plan was adopted in 2003, prior to the City’s purchase of the SMC in 2005 and prior to the 2011 listing of the SMC.

The City of San Marino identifies the following broad land use goals in the Land Use Chapter of the General Plan. The objectives and policies of Land Use Chapter are intended to aid the City in reaching these goals:

1. *Maintain the residential character of San Marino.*
2. *Protect the single-family home pattern of development in San Marino neighborhoods.*
3. *Protect existing lot sizes and discourage lot subdivisions that are incompatible with the neighborhood in which they are located.*
4. *Support unique commercial areas - business activities should meet the needs of local residents while recognizing that some businesses are attractive regionally.*
5. *Perpetuate a healthy, but contained and limited, commercial environment as a service and convenience to San Marino residents, without detrimental encroachment upon the single-family areas of the community.*
6. *Accommodate future needs for municipal facilities.*
7. *Protect existing and provide for more recreational space for residents.*
8. *Cooperate with The Huntington and support the Old Mill as local cultural resources.*
9. *Ensure high quality design characteristics of existing and proposed structures in San Marino.*
10. *Ensure that new development is compatible with established neighborhoods.*
11. *Preserve significant historic properties on the State Register and National Register.*
12. *Maintain the current standard of high-quality and well-maintained properties.*
13. *Maintain reasonable buffers between residential neighborhoods and commercial uses in the City.*
14. *Establish policies for on-site parking for all uses and allow for adequate alternative parking sites for commercial uses.*
15. *Protect property values.*

Therefore, the Project is consistent with the overarching guidelines for the Land Use Element, except for No. 11 which is the preservation of significant historic properties on the State Register and National Register.

Table 5-2: General Plan Consistency Analysis – Land Use is an excerpt from Table 4.11-1 contained in the 2022 Initial Study to focus specifically on General Plan Policies of the Land Use Element, Section Three – Preservation, and the Project’s consistency with those policies.

Table 5-2: General Plan Consistency Analysis – Land Use

| General Plan Goal or Policy | Project Consistency Analysis |
|---|---|
| General Plan - Land Use Chapter | |
| <i>Section Three - Preservation</i> | |
| <p>Goal: Protect the historical and culturally significant resources that contribute to community identity and a sense of history.</p> <p>Objective L.23 Review existing listed resources and determine appropriate action for state and national listings.</p> <p>Policies:</p> <p><i>Consider whether or not resources are appropriately placed on current lists.</i></p> <p><i>Recognize, publicize, and maintain the sites that are locally significant.</i></p> <p><i>Identify significant architectural, cultural, and historic resources within the city that would qualify for the state or national register.</i></p> <p><i>Cooperate with the San Marino Historical Society and other community groups involved in recognizing the City's history.</i></p> | <p><i>Inconsistent.</i> The SMC is eligible to the National Register of Historic Places, is listed on the California Register of Historic Resources, is a city landmark per the Code, and was identified in a “Citywide Historic Resources Survey Report.” The SMC was identified to be the first community center in San Marino. The Project consists of materially altering the architectural design of the SMC in a manner that is not consistent with the Secretary of the Interior Standards for the Treatment of Historic Properties. The proposed design, however, was a result of significant City outreach effort among the community groups – some of which agreed with the revised architectural design and some of which did not feel the architectural design should be changed. Therefore, while the Project is consistent with some of the polices identified in Section Three of the Land Use Element, the Project is not consistent with the Goal or Objective to, overall, protect the resource. The City Council has the ultimate authority to determine the appropriate action for state and national listings.</p> |
| <p>Objective L.24 Encourage the preservation of significant architectural, historic, and cultural resources.</p> <p>Policies:</p> <p><i>Encourage the identification of areas and structures of historic, architectural, and cultural significance within the city.</i></p> <p><i>Any designation based upon area, site or structure within the city should be subject to the City's approval.</i></p> <p><i>Any designation of a property within the City should be subject to the property owner's approval.</i></p> | <p><i>Inconsistent.</i> The policies that support Objective L.24 are related to the encouraging the identification of historic properties. The Project will materially alter the SMC, a listed resource, in a manner that would jeopardize its listing, making it ineligible for listing in a future study.</p> |

| General Plan Goal or Policy | Project Consistency Analysis |
|--|--|
| <p>Objective L.25 Encourage and provide incentives to achieve preservation of significant architectural, historical, and cultural buildings and neighborhoods.</p> <p><i>Policies:</i></p> <p><i>Support tax incentives and other methods deemed mutually agreeable to the City and the property owner, which will help to preserve historic resources.</i></p> <p><i>Consider the relaxation of current building and zoning codes, as necessary, to preserve significant structures, while ensuring that basic health and safety goals are met.</i></p> <p><i>Provide information to property owners who desire such information on how to rehabilitate, research, and appreciate their architecturally, historically, and culturally significant property.</i></p> | <p><i>Inconsistent.</i> The Project is to make alterations to the SMC in a manner that is not consistent with the Secretary of the Interior Standards for the Treatment of Historic Properties (Standards). The Standards are designed to assist property owners with the rehabilitation of historic properties in a manner that will retain their historical value yet allow the structure to be brought into current safety and other code compliance.</p> |

The Land Use Chapter, Section Three - Preservation also identifies the following City process with respect to historic properties in the City:

The City has an intensive design review process and has adopted residential design guidelines. These include detailed text and illustrations intended to ensure the compatibility of overall architecture as well as architectural detailing with existing development. Currently, a design review committee appointed by the Council reviews development plans to ensure compatibility with the existing historic fabric of San Marino neighborhoods. Alterations to property visible from public view as well as all new construction are scrutinized.

Compliance with City Ordinances/Codes

The City’s historic preservation review process is outlined in the Chapter XXIII, Article 18 of the San Marino City Code. The process is designed to work with property owners of historic properties to encourage the retention of the character of the structure while bringing the structure up to current codes and in accordance with the Secretary’s Standards. Specifically, Ordinance Chapter XXIII, Article 18 states it is designed to “*promote the public health, safety, and general welfare by providing for the identification, designation, protection, enhancement, and ongoing use of historical resources that represent the City’s cultural, architectural, social, economic, and political heritage.*”

As discussed in DEIR Section 5.1.2, the SMC is considered a City Landmark. As such, Chapter XXIII, Article 18, Section 23.18.07 of the San Marino City Code also identifies that any alteration, restoration, rehabilitation, construction, removal, relocation, or demolition of any historic landmark must receive a Certificate of Appropriateness approval from the City.

Analysis Summary

Therefore, while the City did conduct extensive outreach and the Project does generally align with the City's Vision Statement, the Project does not align with the General Plan Land Use Chapter Section Three - Preservation which seeks to preserve the historical structures in San Marino.

Additionally, the Project is not consistent with findings that need to be made pursuant to Chapter XXIII, Article 18, Section 23.18.07 San Marino City Code to issue a Certificate of Appropriateness when renovating historic buildings.

5.2.6 Mitigation Measures

Because the conflict with the land use plan, policy, or regulation is related to modification of a historical resource, the **Mitigation Measure CUL-2, CUL-3 and CUL-4** identified in DEIR Section 5.1.6 would also apply to mitigation for the General Plan goal of historic resource protection. And while these measures will reduce impacts, these mitigation measures do not fully mitigate impacts because the requirements to obtain a Certificate of Appropriateness to alter the historic resource building could not be met.

5.2.7 Level of Significance After Mitigation

With the implementation of the mitigation measures CUL-2, CUL-3 and CUL-4, the impact to land use policies relative to preservation of historic resources would not be reduced to a less than significant level.

Therefore, the Proposed Project, as currently designed, will cause a significant environmental impact due to a conflict with the City's General Plan adopted for the purpose of avoiding or mitigating an environmental effect.

The level of significance of the impact to Land Use and Planning - Conflict With Policies is Potentially Significant after mitigation is incorporated.

Statement of Overriding Considerations

The City has the discretion to balance the benefits of a project against its unavoidable significant environmental impacts in considering whether to approve a project under CEQA. The City may approve a project with significant impacts if they adopt a Statement of Overriding Considerations finding that the project's benefits outweigh the unmitigated impacts. Project benefits may include economic, legal, social, and other considerations. Based on the identification of significant impacts to land use policies, the City would need to adopt a Statement of Overriding Considerations in order to approve the Proposed Project.

5.2.8 Cumulative Impacts

The Proposed Project impacts are limited to preservation of a single historic resource. No changes to the City's current historic preservation policies and codes are proposed. The impacts are limited to one historic resource, owned by the City. Therefore, potential cumulative impacts of conflicts to land use plans and policies are less than significant, and no mitigation is required.

5.3 PUBLIC SERVICES: SCHOOL FACILITIES

5.3.1 Introduction

The 2022 Initial Study prepared for the Proposed Project (Appendix F) concluded that the Proposed Project would result in less than significant impacts on fire services, police services, parks, or other public facilities. The Proposed Project will not increase population growth. Therefore, there is no need for additional schools, library or other public services. Therefore, impacts to these public services will not be further discussed here in the DEIR.

The 2022 Initial Study identified that impacts related to schools could be potentially significant, but feasible mitigation measures were identified to reduce impacts to less than significant. During the NOP comment and scoping period, some commenters requested more detail as to the Proposed Project's potential impact to schools, including the Huntington Middle School's operation of the Barth Athletics Complex (BAC) which was completed in late 2019/early 2020, at the same time as the COVID-19 pandemic forced the closure of public schools. The BAC is a new two-story athletic complex that includes a full-sized California Interscholastic Federation (CIF) Regulation gymnasium for the campus, two Media Classrooms, Fitness Room, Boy's and Girl's Team Rooms, and a second-floor multi-purpose room. The BAC was constructed in the same location as the former gym and track and field and was designed to replace outdated and undersized school athletic facilities.

Therefore, this section is designed to provide additional analysis for only schools, as requested during the NOP process.

5.3.2 Regulatory Setting

There are no regulations that are specific to schools that are co-located with City or other public facilities.

In August 2018, the SMUSD prepared an *Update to the 2013 Assessment of School Safety and Security Measures* for each of its campuses (gkk Works, August 13, 2018), which includes the Huntington Middle School adjacent to the SMC. The report was originally prepared in 2013 by the SMUSD in response to continuing concerns regarding safety and security at the San Marino schools. The 2018 revision represented a follow up and update to the report prepared in 2013 in the aftermath of the Sandy Hook Elementary School shooting in Newtown Connecticut, in December 2012.

The report primarily identified a number of safety and security items for the Huntington Middle School. It also reviewed the traffic circulation for entry and exit points and general internal circulation of the parking lot.

5.3.3 Environmental Setting

Parking for the SMC is provided in 48 spaces located on the south side of the building, within the parking lot of Huntington Middle School, through a cooperative agreement with the SMUSD for use of the 48 spaces for both the SMC and as overflow parking for the Crowell Public Library. The shared parking arrangement with the SMUSD appears to be a traditional feature of the SMC and the Library, as historical articles in the Los Angeles Times indicate that the San Marino Women's Club used the "school parking

area” for club parking and for community events. A formal shared parking agreement between the City and the SMUSD was initiated in 2006 after the City purchased the building, and the agreement was renewed in 2019 for a 10-year term (refer to Appendix A in the 2022 Initial Study, located in Appendix F of this DEIR).

5.3.4 Thresholds of Significance

Potential impacts to Public Services were fully evaluated in Section 4.15 of the 2022 Initial Study in accordance with the Section XV of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. As discussed in Section 4.15, there were no or less than significant impacts for police, fire and library services and facilities, and no further discussion is warranted. The threshold addressed in this DEIR is for Schools, as follows:

XV.a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection, Police protection, Schools, Recreation/Parks, Other public facilities?

5.3.5 Impact Analysis

Because the SMC and the Huntington School share a parking lot, with the SMC having designated spaces, a parking study for the Proposed Project was conducted to ensure the Project would not impact the school’s ability to service its programs to the extent that the school would need to construct another parking lot for its use. The parking study was conducted as part of the Project’s Transportation Impact Study, (herein referred to as “TIS”) for the 2022 Initial Study (refer to Appendix E of the 2022 Initial Study, located in Appendix F of this DEIR), and updated in February 2022 in response to requests received during the NOP process for additional analysis (**Appendix D - Traffic Impact Study - San Marino Improvement Project, February 23, 2022**).

The parking study in the TIS evaluated the school’s typical calendar, pick-up and drop-off times, as well as evaluated the potential SMC event calendar as identified in Table 3-1 of this DEIR. The school calendar information obtained from the SMUSD staff was for the school years 2018-2019, 2019-2020, and through Spring 2021 and included an estimate of the number of potential attendees for each of the events identified on the calendar. Interviews with District staff identified that the BAC was designed to replace outdated, undersized gym facilities and was not designed to increase the number of services or athletic teams or events (Personal Communication, June 2021). The BAC is open to community user groups for non-school sponsored activities, just as the former gym and facilities were open to community groups for non-school sponsored activities. However, because the BAC was not fully operational prior to the COVID-19 pandemic school shutdown, there was no data available as to if the BAC would be utilized for additional school events, and therefore, generate the need for additional parking for the school events.

Project Parking Needs Determination

The parking study in the TIS modeled parking ratios based on the Institute of Transportation Engineers’ (ITE) *Parking Generation Manual* publication. The *Parking Generation Manual* presents the state-of-the-

practice understanding of the relationship between parking demand and various characteristics associated with individual land use developments, based on parking studies conducted at locations throughout North America. While the *Parking Generation Manual* does not contain a parking ratio specifically for a community center, the two land uses most applicable are those for a government office building and a recreational community center.

The parking study applied the two ITE published parking demand ratios to the proposed SMC Improvement Project to evaluate the number of spaces required for a community center. As a government office building, the average weekday peak parking demand of 32 spaces was identified; as a recreational community center, the average weekday peak parking demand was 22 spaces.

A calculation of the San Marino City Code parking requirement was also prepared in accordance with the City of San Marino Municipal Code off-street parking requirements (Section 23.10.03, Number of Parking Spaces Required). In accordance with the Municipal Code parking regulations, the following parking requirement was determined to be most applicable to the proposed project as follows:

- Office buildings. For all buildings on Huntington Drive (including commercial areas on Chelsea Road, Granada Avenue, San Gabriel Boulevard and San Marino Avenue) existing on October 25, 2010: 1 space for every 350 square feet of gross floor area.

Through strict application of the Municipal Code parking regulations, the total gross floor area of the SMC is 10,832 square feet, therefore:

- Community Center: $10,832 \text{ SF} \times 1.0 \text{ space}/350 \text{ SF} = \text{rounded to } 31 \text{ spaces}$. Total Code Required Project Parking = 31 spaces

In summary, the San Marino City Code parking requirement for the proposed SMC Improvement Project (i.e., 31 spaces) is less than the parking demand forecast utilizing the ITE parking demand ratios for a government office building (i.e., 32 spaces) but more than that forecast for a recreational community center (i.e., 22 spaces).

The parking analysis in the TIS identified that the 48 spaces as identified in the SMUSD/City agreement was generally sufficient to accommodate the Proposed Project's historic and future use and would generally not interfere with the school's ability to supply parking for its ongoing activities (DEIR, Appendix D).

The parking analysis in the TIS also evaluated the parking demand for all 209 spaces in the parking lot that is shared between the SMC, library and school (DEIR, Appendix D). The analysis concluded that the shared parking demand would create a surplus of 9 to 11 parking spaces during peak weekday and weekend conditions, respectively, assuming that the 17 on-street spaces along Huntington Drive and West Drive along the library frontages are also available for shared use. Therefore, the Project would not create an additional demand for parking under anticipated general operations.

However, the TIS (DEIR, Appendix D) identified that while the number of spaces is adequate under general conditions, the allocation of 48 spaces for SMC may not be sufficient if the SMC, Crowell Public Library and the Huntington Middle School held large-scale events at the same time (such as a wedding or conference at the SMC at the same time as a major athletic event at the school). As such, mitigation

measures were identified in the Initial Study to ensure coordination between the City and the Huntington Middle School to reduce the potential for a significant demand for concurrent parking during highly attended concurrent events, which may interfere with the school's ability to provide services and programs, thereby necessitating the school to consider constructing additional facilities, such as another parking lot.

5.3.6 Mitigation Measures

The existing parking allocation of 48 spaces for the SMC appears to be consistent with what is required by the City Code and ITE. The TIS also determined that the existing allocation of parking spaces within the Huntington Middle School parking lot was adequate to serve the Proposed Project. Therefore, no mitigation applies to Proposed Project for its envisioned existing and proposed use.

There is no change from the 2022 Initial Study as to the need to implement mitigation measures to address the potential for a parking demand deficit for potential future highly-attended concurrent events between the City (SMC and Library) and the Huntington School. For this DEIR, the measures from the 2022 Initial Study have been refined based on comments received during the NOP comment and scoping period. Underlined text (underlined) represents text deletions and strikeout text (~~strikeout~~) represents text additions. The measures are as follows:

- PS-1 Shared Event Calendar.** The City ~~and shall work with~~ the Huntington Middle School ~~should~~ to maintain an joint events calendar that is accessible and shared between the City (for library and SMC events) and the Huntington Middle School which would include the date, time and duration of the event, including the expected attendance figure for each event. ~~Special SMC events/meetings where 40 attendees or more are expected would require further coordination with the Huntington Middle School and Crowell Public Library to ensure that any overlap of activities is minimized to the extent possible.~~ To the extent feasible, the City and the Library shall avoid scheduling classes/meetings/events held at the SMC and the Crowell Public Library that begin or end such that it overlaps with the morning drop-off and afternoon pick-up peak time periods at the Huntington Middle School.
- PS-2 Managed Parking Collaboration.** ~~Prior to the completion of Project construction, The~~ the City shall initiate collaborative discussions with ~~and~~ the Huntington Middle School ~~should collaborate to implement to develop a managed parking plan to be implemented whenever concurrent events are anticipated to exceed the total number of parking spaces available within the school parking lot. Managed parking strategies to be implemented in such circumstances include but are not limited to valet parking, tandem parking, and dedicated ride share areas and special event parking permit requirements. for some spaces within the on-site parking facility (i.e., both valet parking spaces and tandem parking spaces) which would increase the effective parking supply as valet-attended parking could occur within drive aisles located throughout the on-site parking areas or other nearby lots (i.e., District Office parking lot).~~
- PS-3 Additional Parking Study for Huntington Drive.** The City ~~will~~ shall study the installation of additional parking spaces along the south side of Huntington Drive along the SMC

frontage, similar to the spaces that are currently in front of the Crowell Public Library, and implement as feasible.

PS-4 Encourage Alternative Transportation. ~~The City shall encourage users and employees of the SMC and Crowell Public Library and Huntington Middle School should encourage all of its users and employees to utilize alternative modes of transportation including but not limited to: bicycle, transit, ride-share, and other ride service opportunities to events where appropriate. Implementation of this method includes but is not limited to public awareness in the form of a statement on the City’s website, a statement on recreational class schedules, and a statement in contracts for private events.~~

PS-5 Conduct Future Parking Study. ~~The City will shall~~ conduct a parking utilization monitoring study one year from issuance of the Project’s Certificate of Occupancy. The parking utilization monitoring study must ~~demonstrate that~~ assess whether on-site parking is adequate to meet Project demand during both weekday and weekend conditions, as well as the effectiveness of measures PS-1 and PS-2. If the study shows that Project parking demand exceeds the supply of parking within the Project, the study shall identify additional available parking reduction strategies, and the City shall select and implement ~~City shall propose~~ measures to reduce or otherwise address parking demand, spillover parking impacts, subject to review and approval by the Director of Public Works Community Development. The additional parking reduction strategies may include, but are not limited to: 1) preparation of a Valet Parking Plan, 2) provision of shuttles from off-site locations for high-attendance events; ~~3) provision of transit passes and/or ride-share subsidies for employees, and/or 4) subsidized off-site parking options in order to minimize on-site employee parking demand, if necessary.~~

5.3.7 Level of Significance After Mitigation

No mitigation is required to reduce impacts of the Proposed Project for its general proposed use as a community center for recreation classes, staff offices and community meetings, therefore, the impact is less than significant.

With implementation of **Mitigation Measures PS-1 through PS-5**, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, such as an additional parking lot, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, as identified in the 2022 Initial Study and this DEIR, potential impacts associated with schools would be less than significant with the incorporated mitigation, and no further mitigation is required.

5.3.8 Cumulative Impacts

The SMC is the only community center in the City that is adjacent to a school. Therefore, there are no other projects that are similar in nature that apply to a cumulative impacts analysis. The TIS prepared for the project addressed potential cumulative impacts of event parking in the shared parking lot of the school, which resulted in the mitigation measures. There are no other cumulative impacts associated with the Proposed Project.

5.4 TRANSPORTATION

5.4.1 Introduction

The 2022 Initial Study prepared for the Proposed Project (Appendix F) concluded that the Proposed Project would result in less than significant impacts on transportation. The TIS was initially prepared for the Proposed Project in September 2021 as part of the Initial Study (Appendix F). The 2022 Initial Study analysis prepared for the Proposed Project concluded that the Project impacts were less than significant, and no mitigation measures were identified.

During the NOP scoping meeting, one commenter requested that the DEIR re-evaluate traffic impacts and consider the SMUSD's Traffic Study prepared in 2018 which addressed the Huntington Middle School (**Appendix E - Traffic Circulation Review of Huntington Middle School, July 31, 2018**). The City of San Marino Public Safety Commission, along with the City Traffic Engineer, the City Director of Public Works and City Chiefs of Police and Fire also reviewed the report in 2018. As such, in preparation of this DEIR, the TIS was revised in February 2022 to consider the SMUSD's traffic study (DEIR, Appendix D). Therefore, this section is designed to provide the results of the additional analysis as requested during the NOP scoping meeting.

5.4.2 Regulatory Setting

Senate Bill 743

Senate Bill 743, adopted in 2013, added section 21099 to the Public Resources Code, which states that automobile delay, as described by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. The law also directed the Office of Planning and Research (OPR) to amend the CEQA Guidelines to establish new metrics for determining the significance of transportation impacts of projects. The California Natural Resources Agency certified and adopted the amended CEQA Guidelines in December 2018. In the amended CEQA Guidelines, OPR selected vehicle miles traveled (VMT) as the preferred transportation impact metric and applied its discretion to require use of VMT statewide, beginning in July 2020. Accordingly, jurisdictions must now use the VMT methodology as the metric for evaluating the environmental impacts on transportation under CEQA instead of the traditional level of service (LOS) methodology. Essentially a project's environmental impacts can no longer focus on vehicle delay at street intersections or on roadway segments but must use the miles a vehicle must travel between a dwelling and commerce, recreation and/or work. The intent of this shift in methodology is to encourage different land use and transportation decisions to reduce greenhouse gas emission, support in-fill development and improve public health through active transportation.

Regional Transportation Plan

The Southern California Association of Governments (SCAG) is a council of governments representing the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The Regional Transportation Plan (RTP) for the six-county region is the 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy (2016 RTP/SCS), adopted by SCAG on April 7, 2016. The SCS outlines a development pattern for the region, which, when integrated with the transportation network

and other transportation measures and policies, would reduce greenhouse gas emissions from transportation (excluding goods movement).

City of San Marino

The City of San Marino's Circulation Element (Meyer, Mohaddes Associates, Inc., August 1995) for its General Plan was established to provide for a safe, convenient and efficient transportation system for the City. To meet this objective, the Circulation Element was designed to accommodate the anticipated transportation needs based on the estimated intensities of various land uses within the region. The City's Circulation Element and the Final General Plan (2003) sets forth actions and policies pertaining to accident and traffic safety, transit and public transportation, ensuring easy and convenient access to the regional facilities, bicycle routes and pedestrian facilities, among other things. Relevant adopted policies include:

Circulation Element:

Functional Classifications of Roadways

- *Policy 5. Safe or acceptable levels of service on City streets shall be a criterion for evaluation of land use developments. The minimum acceptable level of service at intersections shall be level of service C. A new development project would be considered to have a significant negative impact if it added more than 200 vehicles per day to a Local street or caused the daily volume on the Local street to exceed 2,500 vehicles per day.*
- *Policy 11. Maintain and enhance the character of Huntington Drive as a Parkway and as the main commercial/civic center of San Marino, thereby strengthening support for these commercial areas, through landscaping and pedestrian amenities in keeping with the residential character of the community.*

Neighborhood Traffic Control Plans

- *Policy 13: Develop and implement neighborhood traffic control plans which will reduce the speed and volume of traffic on residential streets to acceptable levels.*
- *Policy 17: Improve safety at school drop-off areas and employ appropriate traffic control measures in the vicinity of schools to maximize safety for school children walking or bicycling to/from school.*

Public Transportation

- *Policy 18: The City shall work with public transit agencies to ensure that transit lines are routed on streets in accordance with the policies of [the] Circulation Element.*
- *Policy 22. The City shall continue to provide paratransit (Dial-A-Ride) services to residents, to the extent that resources allow.*

Non-Motorized Transportation

- *Policy 23: The City shall develop a bicycle plan which provides opportunities for safe, recreational bike usage and provides continuity between land uses in San Marino.*
- *Policy 24: The City shall evaluate the sidewalk system throughout the City, in all neighborhoods, and where approval for sidewalk installation is provided by residents.*
- *Policy 25: In areas of the City, where commercial or public facilities are located, the City shall implement measures to enhance the pedestrian and bicycle environment, to attempt to slow passing vehicular traffic,*

and to ensure handicapped accessibility in accordance with the requirements of the Americans with Disabilities Act.

- *Policy 26: Install pedestrian-activated signals, where appropriate, and crosswalks to provide safe, adequate pedestrian accessibility for shopping areas and residences.*

Transportation Demand Management

- *Policy 36: The City shall encourage its residents and employees to utilize alternative modes of transportation such as buses, light rail transit, carpools, Dial-A-Ride vehicles, bicycles and walking and shall take measures to ensure that these alternate modes are available in the City.*
- *Policy 37: The City shall encourage Transportation Demand Management programs as a mechanism to reduce parking demands in the City.*

Vehicle Miles Traveled Evaluation Method

Per City Resolution No. R-20-18, the City’s project review process utilizes VMT as the method to determine a project’s impact on the environment for CEQA purposes. The San Gabriel Valley Council of Governments (SGVCOG) produced a Vehicle Miles Traveled Evaluation Tool (“VMT Evaluation Tool”), which was developed by Fehr & Peers as part of the VMT Implementation Study effort. A number of the cities in the San Gabriel Valley, including the City of San Marino, utilize this tool for its VMT analysis to determine a project’s impact on the environment. VMT measures how much actual auto travel (additional miles driven) a proposed project would create on the roads.

Consistent with the requirements of CEQA Guidelines Section 15064.3, the City of San Marino adopted significance criteria for transportation impacts based on VMT when evaluating VMT to determine traffic-related impacts for land use development projects (**Table 5-3 - City of San Marino VMT Thresholds**).

Table 5-3: City of San Marino VMT Thresholds

| Project Type | Thresholds |
|--|--|
| Land Use Plan | 1) Project Impact: A significant impact would occur if the VMT rate for the plan would exceed the applicable baseline VMT rate. 2) Cumulative Project Effect: A significant impact would occur if the project increases total regional VMT compared to cumulative no project conditions. |
| Land Use Project | 1) Project Impact: A significant impact would occur if the VMT rate for the project would exceed the applicable baseline VMT rate. 2) Cumulative Project Effect: A significant impact would occur if the project increases total regional VMT compared to cumulative no project conditions. |
| Retail Project (over 50,000 square feet) | 1) Project Impact: A significant impact would occur if the VMT rate for the project would exceed the applicable baseline VMT. 2) Cumulative Project Effect: A significant impact would occur if the project increases total VMT in the study area compared to baseline conditions. |
| Transportation Project | A significant impact would occur if the project causes a net increase in total regional VMT compared to baseline conditions, opening year no project conditions, or cumulative no project conditions. |
| All land use and transportation projects | A significant impact would occur if the project is inconsistent with the RTP/SCS (Regional Transportation Plan/Sustainable Communities Strategy). |

The State OPR also set forth guidance for agencies to use “screening thresholds” to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (refer to CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.). The types of projects that are exempt from preparing a detailed VMT analysis are based on project size, maps, transit availability, and provision of affordable housing. The City of San Marino adopted three screening criteria which may be applied to screen proposed projects out of detailed VMT analysis. These screening criteria include Transit Priority Area Screening, Low-VMT Screening and Project Type Screening.

Level of Service Evaluation Method

Per City Resolution No. R-20-18, the City’s project review process utilizes VMT as the method to determine a project’s impact on the environment for CEQA purposes and retains the LOS analysis to ensure consistency with the City’s General Plan. The LOS method is defined in the Highway Capacity Manual 6 and assigns a qualitative letter grade that represents the operations of the intersection, ranging from LOS A (minimal delay) to LOS F (excessive congestion). LOS E represents at-capacity operations. Descriptions of the LOS letter grades for signalized and unsignalized intersections are provided in **Table 5-4: Level of Service Descriptors**. The City of San Marino’s General Plan Policy No. 5, prepared in 1994, identifies a LOS “C” as generally acceptable. The 2021 Citywide Traffic Study (herein referred to as “Citywide Study,” Iteris, Inc., March 30, 2021) which was prepared to develop safety and/or traffic calming improvements within the City, identified that most intersections throughout the City operate at “generally acceptable conditions (LOS D or better).” The Citywide Study data reflects the population growth and regional transportation system changes that have occurred since the time the 1994 Circulation Element was adopted.

Table 5-4: Level of Service Descriptors

| LOS | Description | Intersection Control Delay (seconds/vehicle) | |
|-----|---|--|----------------------------|
| | | Signalized Intersections | Unsignalized Intersections |
| A | Operations with very low delay occurring with favorable progression and/or shortcycle length. | ≤ 10 | ≤ 10 |
| B | Operations with low delay occurring with good progression and/or short cyclelengths. | >10 and < 20 | >10 and < 15 |
| C | Operations with average delays resulting from fair progression and/or longer cyclelengths. Individual cycle failures begin to appear. | >20 and < 35 | >15 and < 25 |
| D | Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable. | >35 and < 55 | >25 and < 35 |
| E | Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. | >55 and < 80 | >35 and < 50 |
| F | Operation with delays unacceptable to most drivers occurring due to oversaturation, poor progression, or very long cycle lengths. | > 80 | > 50 |

Source: Iteris, Inc., March 30, 2021.

5.4.3 Environmental Setting

The Project site is located at 1800 Huntington Drive, along the south side of Huntington Drive, approximately 400 feet west of the intersection with West Drive. Huntington Drive, oriented in a northeast-southwest direction, is a six-lane divided roadway, representing the major east-west corridor through the City.

Operations and Planning Studies

Consistent with the City's commitment to ensure safety on its roadways, the City commissioned several operational planning studies:

- **Huntington Drive Safe Streets Corridor Plan (Plan).** Produced in 2018 through a Caltrans grant in conjunction with SCAG, the Plan focused on 2.5 miles of Huntington Drive in the City of San Marino to identify policies, projects, and/or programs that will help ensure the corridor functions safely and effectively now and in the future. The Plan included:
 - Provided possible designs, recommendations, and development standards for improved road safety and operations, pedestrian, bicycle and/or transit facilities, and enhanced safety features and streetscapes;
 - Provided prioritized recommendations for implementation and potential funding sources; and
 - Provided potential implementation of recommendations resulting in improved conditions for accessing schools, businesses, and residences located along the Huntington Drive corridor.
- **Citywide Traffic Circulation Study.** Prepared in March 2021 by the traffic consultant Iteris, the purpose this study was to utilize current traffic data and community feedback to develop implementable safety and/or traffic calming improvements within the city. The report provides a summary of existing transportation conditions within the City, a discussion of previous planning efforts, recommendations for circulation improvements, and a toolbox for traffic calming measures. The report includes key information regarding traffic volumes, roadway and traffic signal characteristics, a review of other relevant plans/studies, historical collision data, and analysis of current traffic operations during peak conditions. The traffic volumes were collected for this study in 2019 and 2020 and reflect the roadway conditions prior to the COVID-19 pandemic.

Public Transit

Public bus transit services are provided within the Project area by the Los Angeles County Metropolitan Transportation Authority (Metro) lines and the City of Montebello Bus Lines (MBL). Public transit access to the Project site is accommodated by Metro which runs one line along Huntington Drive at a frequency of approximately 60 minutes during weekday and Saturday peak service. The nearest bus stops for Metro Line 79 provide amenities including benches and trash receptacles east of the project site (i.e., along the north side of Huntington Drive west of West Drive and along the south side of Huntington Drive east of West Drive). Other bus stops for Metro bus lines with benches and trash receptacles are provided west of the project site (i.e., within approximately one-quarter of a mile of the project site) at the following

locations: 1) along the north side of Huntington Drive west of Virginia Road, and 2) along the south side of Huntington Drive east of Virginia Road.

Bicycle Facilities

Bicycle infrastructure consists of both facilities within the roadway as well as public bicycle parking spaces. The Federal and State transportation systems recognize three primary bikeway facilities: Bicycle Paths (Class I), Bicycle Lanes (Class II), and Bicycle Routes (Class III). Bicycle Paths (Class I) are exclusive car free facilities that are typically not located within a roadway area. Bicycle Lanes (Class II) are part of the street design that is dedicated only for bicycles and identified by a striped lane separating vehicle lanes from bicycle lanes. Bicycle Routes (Class III) are preferably located on collector and lower volume arterial streets.

As indicated in the *Huntington Drive Safe Streets Corridor Plan*, the only existing bicycle facility within the City of San Marino is a north-south Class II bike lane on Del Mar Avenue from Huntington Drive to the southerly City limits (0.70 miles). The *2014 Draft San Marino Bicycle and Pedestrian Plan* included proposed protected bicycle lanes along Huntington Drive. Adjoining jurisdictions have plans for Class II bicycle lanes along Huntington Drive east and west of the City of San Marino (i.e., Los Angeles County Bicycle Master Plan proposes Class II bicycle lanes on Huntington Drive in unincorporated East San Gabriel to the east of the project site and the *South Pasadena Bicycle Master Plan* also proposes Class II bicycle lanes to the west of the site).

Pedestrian Facilities

Pedestrian infrastructure consists of facilities such as sidewalks, crosswalks, pedestrian signals, curb access ramps, Americans with Disabilities Act (ADA) compliant tactile warning strips, and curb extensions, among other things. These facilities are widely provided within the study area. Sidewalks are currently provided along Huntington Drive and along other corridors near the site, including Virginia Road and West Drive. Marked crosswalks, pedestrian signals, and curb ramps are provided at the study intersections.

Roadway Classification and Circulation

Huntington Drive is designated as a “Parkway” in the City of San Marino’s Circulation Element (Meyer, Mohaddes Associates, Inc., August 1995), and is the City’s main east-west roadway carrying an estimated 30,000 vehicles per day. Per the Circulation Element, a Parkway is intended to function as a major thoroughfare for the movement of traffic within the City and between the City and neighboring communities, generally designed to accommodate 20,000 to 50,000 vehicles per day. Parkways are the appropriate locations for commercial activities, higher density land uses, and transit routes.

The travel lanes along Huntington Drive are separated by a 60- to 65-foot median parkway, and the posted speed limit is 40 miles per hour. Huntington Drive in the Project vicinity directly serves mostly commercial and institutional uses, though there are some residences with frontage (driveway access) on the roadway.

5.4.4 Thresholds of Significance

Potential impacts to Transportation were fully evaluated in Section 4.17 of the 2022 Initial Study in accordance with the Section XVII of the CEQA Guidelines, *Appendix G - Environmental Checklist Form*. The analysis of all thresholds identified that the Project would have less than significant impacts, and no mitigation was required.

However, comments received during the NOP comment and scoping period requested that the DEIR further analyze traffic concerns. Based on the comments, the concerns relate to the following two thresholds of significance, which are the only thresholds relative for further analysis in this DEIR:

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

XVII.b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

5.4.5 Impact Analysis

Criterion XVII.a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The guiding program, plan, ordinance or policy for this Project is the City's Circulation Element within the City's General Plan. The purpose of the Project is to enhance the SMC building to allow it to be more usable and accessible to City residents and to provide an office for the City recreation staff. The SMC is currently utilized as a community recreation center and meeting center, and the Chamber of Commerce rents a portion of the SMC for its office. The consistency with the Circulation Element is identified as follows:

Functional Classification of Roadways

Policy 5: Safe or acceptable levels of service on City streets shall be a criterion for evaluation of land use developments. The minimum acceptable level of service at intersections shall be level of service C. A new development project would be considered to have a significant negative impact if it added more than 200 vehicles per day to a Local street or caused the daily volume on the Local street to exceed 2,500 vehicles per day.

For the purpose of ensuring the Project is consistent with the City's Circulation Element Policy 5, [the](#) TIS prepared for the Project utilized the LOS method. The TIS was prepared in September 2021 for the 2022 Initial Study (refer to Appendix E of the 2022 Initial Study, which is contained in Appendix F of this DEIR) and revised in February 2022 (DIER, Appendix D) to address additional analysis as requested during the NOP comment and scoping process.

The TIS determined that the Project is expected to generate 18 new vehicle trips (12 inbound trips and 6 outbound trips) or 21 person trips/1.135 persons per vehicle during the weekday AM peak hour. During the weekday PM peak hour, the proposed Project is expected to generate 16 new vehicle trips (5 inbound trips and 11 outbound trips) or 19 person trips/1.135 persons per vehicle.

The intersections closest to the SMC that were studied in the Citywide Study included West Drive/Huntington Drive (immediately east of the Project site) and Virginia Road/Huntington Drive (approximately 0.25 mile west of the Project Site). The Citywide Study found that although the Circulation Element’s acceptable LOS is C, the Cambridge Road-West Drive/Huntington Drive intersection currently operates at a LOS “D” in both peak AM and peak PM hours, and the intersection of Virginia Road/Huntington Drive currently operates at a LOS “D” in the AM and “C” in the PM peak hours. The Citywide Study also identified that for Huntington Drive, the westbound lanes carried the AM peak hour traffic and the eastbound lanes carried the PM peak hour traffic.

During the NOP comment and scoping period, concerns were raised that the Citywide Traffic Study’s data utilized for the Project’s TIS did not account for traffic experienced during the Huntington Middle School pick-up and drop-off times, and therefore, the Project traffic should be re-evaluated. Transportation studies and operational reviews are focused on the time period where the surrounding street system is most heavily constrained which is commonly during the weekday commuter AM and PM peak hours.

To ensure that the Project’s traffic assessment accounted for potential cumulative impacts of the Project and the pick-up and drop-off times at the school, the Project TIS was revised in February 2022 (Appendix D) to compare the school schedule and data collection methods in the Citywide Study. The Huntington Middle School has an average enrollment of 650 students, grades 6 through 8, and does not have general student bussing services. According to the Huntington Middle School Bell schedule and interviews with Huntington Middle School staff, all students must be in class by 8 am. Therefore, students are typically dropped off by passenger vehicles between approximately 7:15 am and 8 am. School ends at 2:50 pm, therefore, passenger vehicles are generally lined up in the parking lot beginning at 2:30 pm, with student pickup generally completed by 3:30 pm. Athletic events at the BAC typically begin when school ends, or from approximately 3:30 pm to approximately 5 pm. The primary school entrances are from Huntington Drive, one from Sherwood Drive, and one from West Drive.

Table 5-5 Project Intersection Study Times identifies that the peak hour traffic data collected for the Citywide Study would have included the Huntington Middle School traffic in the morning and during after-school programs/events. Therefore, the data utilized in the Project TIS would have also captured the Huntington Middle School traffic. Therefore, no further analysis is required.

Table 5-5: Project Intersection Study Times

| Time | AM | | | | | | PM | | | | | | | |
|-------------------------|------|------|------|------|-------|-------|-------|------|------|------|------|------|------|------|
| | 6:00 | 7:00 | 8:00 | 9:00 | 10:00 | 11:00 | 12:00 | 1:00 | 2:00 | 3:00 | 4:00 | 5:00 | 6:00 | 7:00 |
| Citywide Study | | | | | | | | | | | | | | |
| Student Pickup/Drop off | | | | | | | | | | | | | | |
| After School Activities | | | | | | | | | | | | | | |

Therefore, based on the Project TIS, the Proposed Project would not reduce the LOS below the existing operational LOS as identified by the Citywide Study or reduce the LOS as established by Circulation Element Policy 5 primarily because of the low volume of traffic anticipated to be generated by the Proposed Project. **Table 5-6: Summary of Delays and Levels of Service Weekday AM and PM Peak Hours**

summarizes the findings of the TIS. Therefore, the Project is consistent with the standards set forth in Policy 5 of the Circulation Element.

Table 5-6: Summary of Delays and Levels of Service Weekday AM and PM Peak Hours

| NO. | INTERSECTION | TRAFFIC CONTROL | PEAK HOUR | [1] | | [2] | | | | [3] | | [4] | | | |
|-----|--|-----------------|-----------|------------------------------|-----|---|-----|------------------------|-----|--|-----|---------------------------------------|-----|------------------------|-----|
| | | | | YEAR 2021 EXISTING DELAY LOS | | YEAR 2021 EXISTING W/ PROJECT DELAY LOS | | CHANGE IN DELAY IMPACT | | YEAR 2023 FUTURE PRE-PROJECT DELAY LOS | | YEAR 2023 FUTURE W/ PROJECT DELAY LOS | | CHANGE IN DELAY IMPACT | |
| | | | | [a] | [b] | [a] | [b] | [(2)-(1)] | [c] | [a] | [b] | [a] | [b] | [(4)-(3)] | [c] |
| 1 | Virginia Rd/ Huntington Dr | Signalized | AM | 26.9 | C | 27.0 | C | 0.1 | No | 27.5 | C | 27.6 | C | 0.1 | No |
| | | | PM | 20.8 | C | 20.9 | C | 0.1 | No | 21.3 | C | 21.4 | C | 0.1 | No |
| 2 | Virginia Rd/ Roanoke Rd | All-Way Stop | AM | 10.7 | B | 10.7 | B | 0.0 | No | 10.9 | B | 10.9 | B | 0.0 | No |
| | | | PM | 10.3 | B | 10.3 | B | 0.0 | No | 10.5 | B | 10.5 | B | 0.0 | No |
| 3 | Cambridge Rd- West Dr/ Huntington Dr | Signalized | AM | 41.7 | D | 43.7 | D | 2.0 | No | 42.5 | D | 44.8 | D | 2.3 | No |
| | | | PM | 44.2 | D | 47.7 | D | 3.5 | No | 45.7 | D | 48.7 | D | 3.0 | No |
| 4 | Sierra Madre Blvd- San Marino Ave/ Huntington Dr | Signalized | AM | 176.4 | F | 177.0 | F | 0.6 | No | 184.3 | F | 185.1 | F | 0.8 | No |
| | | | PM | 152.7 | F | 154.0 | F | 1.3 | No | 162.5 | F | 164.4 | F | 1.9 | No |

Policy 11. Maintain and enhance the character of Huntington Drive as a Parkway and as the main commercial/civic center of San Marino, thereby strengthening support for these commercial areas, through landscaping and pedestrian amenities in keeping with the residential character of the community.

The Project proposes no changes to Huntington Drive as a Parkway. Therefore, the Project is consistent with Circulation Element Policy 11.

Neighborhood Traffic Control Plans

Policy 13: Develop and implement neighborhood traffic control plans which will reduce the speed and volume of traffic on residential streets to acceptable levels.

Policy 17: Improve safety at school drop-off areas and employ appropriate traffic control measures in the vicinity of schools to maximize safety for school children walking or bicycling to/from school.

The City prepared the Huntington Drive Safe Streets Corridor Plan and the Citywide Traffic Circulation Study for the purpose of developing projects and policies to increase road, pedestrian and bicycle safety throughout the City. The Proposed Project is to improve a City community center and will not impact the City’s ability to implement projects or plans suggested in those studies.

A comment received during the NOP process requested that the City evaluate if the Project would impact the Huntington Middle School pick-up and drop-off circulation as referenced in a traffic memorandum contained in the SMUSD’s *Update to the 2013 Assessment of School Safety and Security Measures* for each of its campuses (gkk Works, August 13, 2018, herein referred to as “SMUSD Assessment”) including the Huntington Middle School (**Appendix E - Traffic Circulation Review of Huntington Middle School, July 31, 2018**). The SMUSD’s Assessment of traffic conditions at the school (Appendix E) identified that the Huntington Middle School vehicular circulation at drop off and pick-up areas are adequately designed and controlled by surveillance, proper signage and lighting, and generally circulated well. The SMUSD’s Assessment was also reviewed by the San Marino Fire Department in 2018 and identified that it could

access the site with no known impediments. The traffic memorandum also identified improvements to Huntington Drive that could facilitate the school's pick-up and drop-off flow.

The Proposed Project occurs off Huntington Drive and is anticipated to generate minimal traffic. The Proposed Project would not prohibit or affect any plans for the City or the SMUSD to improve Huntington Drive to reduce the speed and volume of traffic on residential streets to acceptable levels, improve safety at school drop-off areas, or employ traffic control measures in the vicinity of schools to maximize safety for school children walking or bicycling to/from school. Therefore, the Project is consistent with Circulation Element Policies 13 and 17.

Public Transportation

Policy 18: The City shall work with public transit agencies to ensure that transit lines are routed on streets in accordance with the policies of [the] Circulation Element.

Policy 22. The City shall continue to provide paratransit (Dial-A-Ride) services to residents, to the extent that resources allow.

The Proposed Project occurs off Huntington Drive and does not impact the ability for the public transit agencies to provide service along Huntington Drive or impact Dial-A-Ride services. Bus stops are conveniently located within walking distance of the SMC for residents to utilize the community center. Therefore, the Proposed Project is consistent with Circulation Element Policies 18 and 22.

Non-Motorized Transportation

Policy 23: The City shall develop a bicycle plan which provides opportunities for safe, recreational bike usage and provides continuity between land uses in San Marino.

Policy 24: The City shall evaluate the sidewalk system throughout the City, in all neighborhoods, and where approval for sidewalk installation is provided by residents.

Policy 25: In areas of the City, where commercial or public facilities are located, the City shall implement measures to enhance the pedestrian and bicycle environment, to attempt to slow passing vehicular traffic, and to ensure handicapped accessibility in accordance with the requirements of the Americans with Disabilities Act.

Policy 26: Install pedestrian-activated signals, where appropriate, and crosswalks to provide safe, adequate pedestrian accessibility for shopping areas and residences.

The City prepared the Huntington Drive Safe Streets Corridor Plan and the Citywide Traffic Circulation Study for the purpose of developing projects and policies to increase road, pedestrian and bicycle safety throughout the City. The Proposed Project is to improve a City community center and will not impact the City's ability to implement projects or plans suggested in those studies.

The Proposed Project will remove the existing secondary driveway to the SMC that is located between the SMC and the Crowell Public Library and replace it with a sidewalk, thereby adding to the pedestrian facility in the Project area. The Project will not require the installation of additional pedestrian signals, crosswalks, or other facilities. Therefore, the Proposed Project is consistent with Circulation Element Policies 23, 24, 25, and 26.

Transportation Demand Management

Policy 36: The City shall encourage its residents and employees to utilize alternative modes of transportation such as buses, light rail transit, carpools, Dial-A-Ride vehicles, bicycles and walking and shall take measures to ensure that these alternate modes are available in the City.

Policy 37: The City shall encourage Transportation Demand Management programs as a mechanism to reduce parking demands in the City.

The City has been utilizing the SMC as a community center since 2005. The City already encourages its residents to utilize alternative modes of transportation throughout the City. The Proposed Project will not conflict with the City's ability to continue to promote alternative modes of transportation. Additionally, the Proposed Project specifically would encourage the use of alternative modes of transportation as well as managed parking collaboration as part of Mitigation Measures PS-2 and PS-4, which were identified to reduce potential impacts to the Huntington Middle School parking lot whenever concurrent events between the SMC, the Huntington Middle School and the Crowell Public Library are anticipated to exceed the total number of parking spaces available within the school parking lot which they share. Therefore, the Proposed Project is consistent with Circulation Element Policies 36 and 37.

Therefore, overall, the Proposed Project does not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Criterion XVII.b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Section 15064.3, subdivision (b)(1) of the CEQA Guidelines requires a determination as to if the project will result in a substantial increase in vehicle miles traveled (VMT) Traditionally, public agencies have set certain thresholds to determine whether a project requires detailed VMT analysis or if aspects of the project could be assumed to have less than significant environmental impacts without a detailed VMT study. The City of San Marino adopted three screening criteria which may be applied to determine if a proposed project required a detailed VMT analysis or if the project could be assumed to have a less than significant impact without a detailed analysis. Proposed projects are not required to satisfy all of the screening criteria in order to screen out of further VMT analysis; satisfaction of one criterion is sufficient for screening purposes. The Project TIS (DEIR, Appendix D) evaluated the Project against the City's screening criteria as follows:

- **Transit Priority Area Screening** - CEQA Guidelines Section 15064.3(b)(1) states in part: "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." In keeping with the statutory presumption of less than significant impacts due to nearby high-quality transit, the City of San Marino has adopted a transit priority area (TPA) screening criterion. Projects which are located within a TPA are presumed to have a less than significant impact, absent substantial evidence to the contrary.

Findings: The Los Angeles County Metropolitan Transportation Authority (Metro) Transit line and the Montebello bus line which provide services in the immediate vicinity of the Project site, do not meet the criteria for a high-quality transit corridor or TPA. Based on a review of the existing

transit service in the vicinity, this screening criteria is not met for the Proposed Project due to the Project being located within a TPA.

- **Low VMT Area Screening** - It is assumed that projects which will be located within areas which currently exhibit low VMT, and that incorporate similar features pertaining to density, land use mix, and transit availability, will tend to exhibit similarly low VMT. In areas where the existing VMT generation already falls below the applicable thresholds, and where projects are likely to generate similar levels of VMT, projects may be screened out of preparing detailed VMT analysis.

Findings: The TIS in Appendix D utilized the SCAG Travel Demand Forecasting Model to establish VMT performance for individual Traffic Analysis Zones (TAZ). The VMT values for each TAZ are then compared to the applicable City thresholds (i.e., VMT per capita, per employee, or per service population) to determine if the TAZ can be considered a low VMT area. Locations within the City of San Marino which qualify for the low VMT area screening are to be identified through the VMT Evaluation Tool. The Project Site is situated within TAZ 22139300, which currently exhibits 27.95 total VMT per service population. The threshold for office project types is noted as 29.77 total VMT per service population. Therefore, the TAZ currently exhibit VMT below the applicable thresholds and could be considered a low VMT area. The Proposed Project site therefore meets the low VMT area screening criterion.

- **Project Type Screening** - Consistent with the OPR's Technical Advisory, the City of San Marino has determined potential screening criteria for certain land development projects that may be presumed to result in a less than significant VMT impact as mentioned in the City's adopted Resolution No. 20-18. Among the land uses exempt include community institutions and projects generating less than 110 trips per day (which is consistent with the OPR Technical Advisory). As mentioned in the City's Resolution and OPR's Technical Advisory, local serving uses typically redistributes and reroutes local trips rather than create new trips. By adding local serving opportunities into the urban fabric and thereby improving destination proximity, local-serving projects tends to shorten trips and reduce VMT.

Findings: The Proposed Project will serve the local population and is considered a community institution, thereby shortening travel distances and reducing VMT. Thus, the Proposed Project can be presumed to result in a less than significant VMT impact based on State guidance because it would reduce VMT by shortening trip lengths, similar to local-serving retail developments and local-serving projects. Therefore, the Proposed Project satisfies the criteria to be considered a local serving use and is screened out from further VMT analysis as it is presumed to cause less than significant transportation impacts.

As part of the NOP process, the City received a comment letter from Caltrans regarding the TIS provided in the 2022 Initial Study and NOP (Appendix A). Specifically, Caltrans agreed that the Project meets the criteria to be screened out of VMT analysis as it will serve the local population and is considered a community institution, thereby shortening travel distances and reducing VMT.

Therefore, as identified in the Initial Study, there is a less than significant impact because the Proposed Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and no mitigation is required.

5.4.6 Mitigation Measures

The 2022 Initial Study identified that the Proposed Project was consistent with the City's circulation standards and was consistent with VMT standards for transportation impacts. The additional analysis provided in this DEIR confirmed the analysis in the Initial Study. As such, impacts are less than significant, and no mitigation measures are required.

5.4.7 Level of Significance After Mitigation

The 2022 Initial Study identified that the Proposed Project was consistent with the City's circulation standards, and no mitigation measures are required to reduce impacts to less than significant. Therefore, the Project impacts remain less than significant after the evaluation contained in this DEIR.

5.4.8 Cumulative Impacts

Cumulative impacts of the Project traffic, combined with proposed area growth and the school activities were analyzed in the 2022 Initial Study and in the TIS (Appendix D). An expanded analysis was provided in this DEIR. The Proposed Project's cumulative impacts were determined to be less than significant, and no mitigation is required.

6 OTHER CEQA CONSIDERATIONS

This chapter discusses the growth-inducement potential of the Proposed Project, the significant environmental effects that cannot be avoided if the project is implemented, and the significant irreversible changes associated with the proposed project.

6.1 GROWTH-INDUCING IMPACTS

This section analyzes the growth-inducement potential of the proposed project, as required by the CEQA. CEQA Guidelines Section 15126.2(d) requires that an environmental impact report (EIR) evaluate the growth-inducing impacts of a project. A project is considered growth inducing if it would directly or indirectly foster substantial economic or population growth or the construction of a substantial number of additional housing units. Examples of projects that are likely to result in significant adverse growth inducement include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand and the development of new residential subdivisions in areas that are sparsely developed or undeveloped. The environmental effects of project-induced growth are considered secondary or indirect impacts of the project. Growth can result in a variety of indirect environmental impacts, including increased demand on community services and public service infrastructure, increased traffic and noise, and degradation of air and water quality.

Discussion

The Proposed Project will have no effect on economic or population growth, nor will it require or result in the development of additional housing. There are no obstacles to population growth that the Proposed Project would alleviate thereby requiring the construction of additional facilities which may directly or indirectly result in a significant impact to the environment, either individually or cumulatively. The City owns the building and currently offers recreational programs for the community from that location. For the reasons stated herein, the project will not be growth-inducing.

6.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

A proposed project's significant environmental effects which cannot be avoided are analyzed in accordance with the following CEQA Guideline:

15126.2 (b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented. Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Mitigation measures have been identified in Section 5.1.6, (Cultural Resources) of the DEIR that are intended to mitigate Project effects to the extent feasible. However, even with the mitigation measures included in the Cultural Resources section (based on the Historical Resource Report), the renovation of the SMC to a different architectural style will have significant environmental effects which cannot be avoided.

Similarly in the category of Land Use and Planning (Section 5.2) mitigation measures identified for Section 5.1.6, (Cultural Resources) would also apply as they could serve to also mitigate the Project's inconsistency

with the City’s policies regarding historic preservation to the extent feasible. However, even with the mitigation measures included in the Land Use and Planning section, the renovation of the SMC to a different architectural style will have significant environmental effects which cannot be avoided.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with Section 21100(b)(2)(B) of CEQA as well as CEQA Guidelines Sections 15126(c) and 15126.2(c), this section identifies significant irreversible environmental changes that would be caused by implementation of the proposed project. The use of nonrenewable resources during the initial and later phases of a project may be irreversible because large commitments of such resources make removal or non-use thereafter unlikely. Primary impacts, and particularly secondary impacts (such as highway improvements that provide access to previously inaccessible areas), generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with a project.

The proposed reconstruction of the SMC, a resource identified by CEQA because it is listed in the California Register of Historical Resources, would constitute a significant irreversible environmental change to a historical resource, according to evaluation identified in Section 5.3.5 of this DEIR. The reconstruction would be similar to demolition of the resource and represent total material impairment of the historical resource; no feasible mitigation measures are available to mitigate the reconstruction of the SMC, as proposed, to a less-than- significant level. Construction of the Proposed Project would result in a minor irreversible and ir retrievable commitment of natural resources through the use of fossil fuels and construction materials.

6.4 AREAS OF KNOWN CONTROVERSY

The Community Development Department prepared an Initial Study checklist and published a Notice of Preparation (NOP) for an EIR on January 7, 2022, thereby announcing its intent to prepare and distribute a focused EIR (Appendix A). Publication of the NOP and Initial Study checklist initiated a 30-day public review and comment period that began on January 7, 2022 and ended on February 7, 2022. Individuals and agencies that received these notices included adjacent property owners and other interested parties.

Based on public comments received during the NOP comment period and scoping meeting, potential areas of controversy for the Proposed Project include the following:

Modernization of an Historic Resource: Beginning in January 2018, the City conducted extensive outreach regarding re-envisioning the City’s recreation program. Between August and September 2020, the City surveyed the community regarding the needs and appearance of the SMC. One of the survey questions asked the community if the City should restore the original 1950s exterior architecture or remodel it to match other City buildings such as the adjacent Crowell Public Library. Of the 209 responses received, there was no clear consensus as to the architectural style for the SMC. Based on the City’s overall vision in its General Plan, the City Council proceeded to prepare renovation plans, which constitutes the Proposed Project.

Transportation and Parking: Commenters raised concerns during the NOP comment period and scoping meeting regarding the potential for increased traffic congestion and conflicts with

parking. The Huntington Middle School shares its parking lot with the SMC, Crowell Public Library and San Marino Unified School District office. Additionally, the Huntington Middle School completed the BAC in late 2019, but the BAC has not been utilized to its full capacity due to COVID-19 pandemic school and community shutdowns. Therefore, it is unknown if the BAC would be utilized for additional or more highly-attended events, beyond the events and attendance prior to the BAC construction, that would generate an increased demand for parking.

The San Marino City Council serves as the decision-making body for the Proposed Project. Issues to be resolved by the City Council include: (1) how to mitigate the significant effects of the Proposed Project; (2) whether to reject or approve one of the alternatives to the Proposed Project and other environmental findings; and (3) whether to reject or approve the Proposed Project.

The City Council must also adopt detailed findings on the feasibility of mitigation measures that substantially lessen or avoid the significant effects of the Proposed Project on the environment.

The City Council will decide to adopt the Proposed Project or any of the Project alternatives that would feasibly attain most of the Project Objectives while avoiding or substantially reducing any of the significant impacts of the Proposed Project.

Because this DEIR has identified adverse environmental effects that are unavoidable, before the Proposed Project can be approved the City Council must also determine whether the adverse environmental effects are considered acceptable with consideration given to economic, social, technological, and other relevant benefits of the Proposed Project pursuant to CEQA Section 15093.

7 PROJECT ALTERNATIVES EVALUATION

CEQA Guidelines Section 15126.6 requires that an Environmental Impact Report (EIR) describe a reasonable range of alternatives to the Proposed Project or to the Proposed Project location that would feasibly attain most of the Proposed Project’s objectives while avoiding or lessening any significant environmental impacts. An EIR should evaluate the environmental impacts of the alternatives compared to the Proposed Project. This chapter of the EIR describes and evaluates project alternatives and is intended to implement the requirements set forth in the CEQA Guidelines. This chapter also identifies the Environmentally Superior Project Alternative as required by CEQA Guidelines Section 15126.6(e)(2).

7.1 RATIONALE FOR SELECTION OF ALTERNATIVES

The following discussion covers a reasonable range of feasible alternatives that focuses on avoiding or substantially lessening any significant effects of the Proposed Project, even if these alternatives would not attain all of the Proposed Project objectives or would be more costly. The discussion focuses on alternatives to the Proposed Project that are capable of meeting most of the Project Objectives identified in Section 3.1 of this DEIR. According to the CEQA Guidelines, many factors may be taken into account when addressing the feasibility of alternatives, such as environmental impacts, site suitability as it pertains to various land use designations, economic viability, availability of infrastructure, regulatory limitations, and jurisdictional boundaries. Also, according to CEQA Guidelines Section 15126.6(d), discussion of each alternative should be sufficient “to allow meaningful evaluation, analysis, and comparison with the Proposed Project.” Therefore, the significant effects of each alternative are discussed in less detail than those of the Proposed Project, but in enough detail to provide decision makers with perspective and a reasoned choice among alternatives to the Proposed Project.

Additionally, a No Project Alternative is required to be included in the range of alternatives. An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, or one that would not achieve most of the basic Proposed Project objectives. Finally, the Environmentally Superior Alternative shall be identified and if it is the No Project Alternative, the next Environmentally Superior Alternative shall be identified.

The Project alternatives evaluated that are addressed in Section 7 include the following:

- Alternative 1 – Preservation Alternative
- Alternative 2 – No Project Alternative

The above alternatives were selected to avoid or lessen significant impacts associated with the Proposed Project while still meeting the majority of the Project Objectives. The alternatives are compared to the impacts of the Proposed Project. A qualitative summary of the alternatives that compares their potential impacts is provided in **Table 7-1: Analysis Summary for Alternatives to the Proposed Project**. As described in Section 3.1, the Proposed Project Objectives are as follows:

- Create architectural, aesthetic continuity along eastbound Huntington Drive between Virginia Road and West Drive by changing the SMC building façade’s architectural features from the existing Modern Colonial Revival to the Spanish-Mediterranean style that is used by the City’s library on the east and the school campus structures to the west.

- Replace interior aged electrical and mechanical systems with code compliant systems including replacing light fixtures;
- Rehabilitate interior space to house City recreational staff;
- Rehabilitate interior space to optimize community use for large and small public and private events; and
- Retrofit and update the facility and grounds with ADA-compliant features.

7.2 ANALYSIS OF ALTERNATIVE 1 – PRESERVATION

7.2.1 Alternative Description

Alternative 1 assumes the preservation/rehabilitation of the SMC would be conducted in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995) and designed in consultation with a qualified historic preservation consultant that meets Secretary of the Interior's Professional Qualification Standards in architecture, historic architecture, and architectural history.

As with the Proposed Project, Alternative 1 would also include reconfiguration of the building interior to include offices to accommodate six City Recreation Department staff, optimize the interior public gathering space, replace the heating/air conditioning, plumbing and electrical systems and light fixtures to current building code standards, and various interior and exterior ADA compliance features. And as with the Proposed Project, the proposed interior space reconfiguration under Alternative 1 would be revised from the existing occupancy of 1,020 to an occupancy rating of 1,083.

For the purpose of this evaluation, Alternative 1 assumes the preservation recommendations identified in the Chattel Memo (Appendix B) would be implemented since the memo was prepared by a preservation consultant that meets Secretary of the Interior's Professional Qualification Standards in architecture, historic architecture, and architectural history.

Alternative 1 would generally consist of the following components as identified in the Chattel Memo:

Building Footprint and Façade:

The Chattel Memo noted that overall, the SMC lacks the aesthetic appeal of its original design due to two porch additions that altered its original massing, the removal of the front planter, and the deterioration of the exterior stucco and weathered wood shakes. Restoring the original footprint by removing both porch additions and rehabilitating of the character-defining features would significantly enhance the overall aesthetic appeal of the building.

The character-defining features identified in the Chattel Memo include:

- One-story rectangular massing with front facing and cross gable roofs;

- Stucco with rectangular grid reveals at parapet;
- Multi-light steel sash windows, wood grid windows, some with wood bevel frames;
- Square steel porch columns with ornamental ironwork; and,
- Fenestration pattern of windows and doors at north (primary), east, south (rear), and west elevations.

In general, façade preservation features would include the following:

North Elevation

- Retain and rehabilitate character-defining features to greatest extent feasible.
- Retain wood shake roof or replace with compatible replacement such as red asphalt shingle or flat terracotta tile.
- Patch, repair and repaint stucco, as necessary. Stucco can be painted to be compatible with the library.
- Retain and rehabilitate square steel porch columns and ornamental ironwork, repaint as necessary. Columns and ornamental ironwork can be painted brown to be compatible with trim of the library.
- Rehabilitate and repair steel sash windows, as necessary.
- Retain and rehabilitate original paving, as necessary.
- Restore original planter at north elevation, match vegetation with library.
- Remove two porch additions (east storage addition and west office addition). Ensure that brick chimney is not damaged in removal of east storage addition. Chemically remove overpaint on brick.
- Detail wall and shade canopy to not touch existing building ensuring reversibility, and revise wall and shade canopy design to be subordinate to existing building. Provide only minimal metal infill at existing porch to enclose courtyard.
- Replace existing primary north entry door leaves to match existing.

East Elevation

- Retain and rehabilitate character-defining features to greatest extent feasible.
- Patch, repair and repaint stucco, as necessary. Stucco can be painted to be compatible with the adjacent library.
- Rehabilitate and repair steel sash and wood grid windows, as necessary.
- Remove porch addition (east storage addition). Ensure that brick chimney is not damaged in removal of east storage addition. Chemically remove overpaint on brick. Restore steel sash doors that were removed to provide access into addition.

South Elevation

- Retain and rehabilitate character-defining features to greatest extent feasible.
- Patch, repair and repaint stucco, as necessary. Stucco can be painted to be compatible with the adjacent library.
- Rehabilitate and repair steel sash and wood grid windows, as necessary.
- Detail wall and shade canopy to not touch existing building ensuring reversibility. Simplify design of the screen wall and trellis to eliminate round arches and detail to be self-supporting and not attached to the existing building.

West Elevation

- Retain and rehabilitate character-defining features to greatest extent feasible.
- Patch, repair and repaint stucco, as necessary. Stucco can be painted to be compatible with the adjacent library.
- Rehabilitate and repair sheet metal window awnings, repaint as necessary.
- Rehabilitate and repair steel sash windows, as necessary.
- Remove porch addition (west office addition) Restore missing square steel porch columns with ornamental ironwork.

Exterior features that are anticipated to remain intact or will not be impacted by the proposed improvements include the following:

- The cornerstone of the building inscribed with “San Marino Women’s Club” near the building entry, and;
- The two large oak trees in the front yard adjacent to the front entry.

Interior Improvements

Interior improvements are anticipated to be similar to the Proposed Project except it is likely to retain the existing period light fixtures and retain the logo in the floor tiles.

- Add two offices (for a total of three offices);
- Install a folding wall in the main room;
- Upgrade the kitchen, bathrooms, ceiling tiles, and electrical and mechanical systems to current code standards;
- Relamp existing period light fixtures; additional lighting may be installed;
- Replace plumbing fixtures with current style fixtures;
- Retain entryway flooring containing the San Marino Women’s Club insignia;

- Various upgrades for ADA compliance, including but not limited to: accessible restrooms; appropriate door hardware; door widths, thresholds; correct access to stage from main floor (from only stairs to stair and personnel lift);
- Update paint and carpet; and
- Conduct other deferred maintenance items.

Interior features that are not anticipated to be impacted by Alternative 1 include the following:

- Fireside room fireplace and cabinetry; and
- Stage.

Utility/Hardscape/Landscape Improvements

Site utility and hardscape improvements are anticipated to be unchanged from the Proposed Project. Site improvements would include preparation for new ADA parking and loading, sidewalk repair, parking lot paving, and landscaping enhancement as necessary that will only require surficial disturbance. As with the Proposed Project, other improvements that will require excavation that will generally vary between 2 to 3 feet wide by 1 to 3 feet deep, depending on the activity (refer to Exhibit 3-7). The activities that require excavation include but are not limited to the following:

- Install new domestic water service and sewer lines in the same area as the existing lines;
- Replace overhead electrical service with new underground electrical service;
- Replace landscaping with drought-tolerant plant materials suitable for placement underneath oak trees and provide aesthetic continuity with the Crowell Public Library landscaping;
- Install new landscape irrigation meter, with pipe replacements, as necessary, in the same location as existing;
- Install new, separate water service for the fire sprinkler system;
- Install new footings for new patio site walls and pilasters, trash enclosure, building columns;
- Add various upgrades for ADA compliance including but not limited to: accessible paths of travel to entry points from parking lot and correct and appropriate disabled parking space; and
- Repair existing building footings and slab where applicable.

7.2.2 Comparison of Effects of Alternative 1 to the Proposed Project

Alternative 1 and the Proposed Project are both located on the same site, and they both have elements of demolition and construction. They both require construction using similar construction equipment, interior improvements and utility and hardscape improvements. The main difference between the Proposed Project and Alternative 1 is primarily the demolition, change or reuse of architectural components.

Table 7-1, located at the end of this section summarizes how Alternative 1 would compare to the Proposed Project based on the environmental subject areas analyzed in the 2022 Initial Study. Based on the project components as described in Section 7.3.1, Alternative 1 would have no more or similar impacts to the Proposed Project in the subject areas that were found not significant in the 2022 Initial Study: Aesthetics; Agriculture and Forestry; Air Quality; Energy; Geology and Soils; Greenhouse Gas; Hydrology and Water

Quality; Land Use and Planning (area of XI(a) Physically Dividing and Community only); Mineral Resources; Population and Housing; Recreation; Transportation; Utilities and Service Systems; and Wildfire.

Alternative 1 would have no more or similar impacts to the Proposed Project in the subject areas that were found to be less than significant with mitigation incorporated in the 2022 Initial Study: Biological Resources; Cultural Resources (area of V[b] Archaeology only); Hazards and Hazardous Materials; Noise; Public Services; and Tribal Cultural Resources.

However, Alternative 1 represents a less than significant impact in the areas of Cultural Resources (area V[a] Historical Resources) and Land use and Planning (area XI[b] Consistent With Policies), which were thresholds that were identified as having Potentially Significant impacts under the Proposed Project.

Cultural Resources (area V[a] Historical Resources). The CEQA Guidelines Section 15126.4(b) addresses impacts to historical resources and mitigation alternatives as follows:

(1) Where maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant.

Therefore, because Alternative 1, will be conducted in a manner consistent with the Secretary's Standards, the impacts of Alternative 1 to Historical Resources would be considered mitigated below a level of significance.

Land use and Planning (area XI[b] Consistent With Policies). San Marino City Code Section 23.18.08 discusses procedures for the City to issue a Certificate of Appropriateness for rehabilitation of historic structures. One requirement is that the project is consistent with the Secretary's Standards and any applicable design guidelines adopted by the City. Alternative 1 will allow the City to make the findings necessary to issue a Certificate of Appropriateness. Alternative 1 is assumes a design that is consistent with the Secretary's Standards, would align with the General Plan Land Use Chapter Section Three - Preservation which seeks to preserve the historical structures in San Marino. Therefore, the Project would be consistent with findings that need to be made pursuant to Chapter XXIII, Article 18, Section 23.18.07 San Marino City Code in order to issue a Certificate of Appropriateness when renovating historic buildings.

With respect to the Public Services (Schools) and Transportation issues, Alternative 1 would have the same impact as the Proposed Project, and all mitigation measures identified for those resource categories would apply to Alternative 1.

7.3 ANALYSIS OF ALTERNATIVE 2 – NO PROJECT

7.3.1 Description

The No Project Alternative assumes that the Proposed Project would not be performed, and the existing conditions would remain. Because no improvements would occur on the Proposed Project site, this alternative would not meet any of the Proposed Project objectives.

7.3.2 Comparison of Effects of Alternative 2 to Proposed Project

Alternative 2 would leave the SMC intact and would not make any changes to the exterior or interior of the building. Table 7-1, located at the end of this section, summarizes how Alternative 2 would compare to the Proposed Project based on the environmental subject areas analyzed in the 2022 Initial Study. Alternative 2 would not result in a significant adverse impact to the SMC, a historic resource. Therefore, there would be a less than significant effect in the area of Cultural Resources – Historical Resources and no impact to conflicting with City preservation policies

With respect to the Public Services (Schools) and Transportation issues, Alternative 2 would have a lesser impact than Proposed Project because the facility would not be reconfigured to optimize use.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires identification of an environmentally superior alternative if the Proposed Project has significant impacts that cannot be mitigated to a less-than significant level. The environmentally superior alternative is the alternative that best avoids or lessens any significant and unavoidable effects of the proposed project, even if the alternative would impede, to some degree, the attainment of some of the project objectives. The No Project Alternative is considered the overall environmentally superior alternative because implementation of the Proposed Project would not occur; therefore, no significant impacts related to historic resources and land use policy conflicts would occur. If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the No Project Alternative” from among the other alternatives evaluated.

Therefore, Alternative 1 (the Preservation Alternative), is the environmentally superior alternative and would result in less than significant impacts related to historic resources and land use policy conflicts. Alternative 1 would rehabilitate the SMC in such a way as not to impair its historic integrity and ability to convey its historic significance and allow it to comply with City preservation standards. Alternative 1 would not result in significant and unavoidable environmental impacts.

Table 7-1: Analysis Summary for Alternatives to the Proposed Project

| Issue Area | Proposed Project | Mitigation Measure | Alternatives | |
|--|------------------|---------------------|--|------------------------|
| | | | 1 <i>Redesign Project to be Consistent with Historic Preservation Standards</i> | 2 <i>No Project</i> |
| I. Aesthetics | | | | |
| a. Scenic Vista | LST | | — | — |
| b. Conflict with Applicable Zoning | LST | | — | — |
| c. New light sources | LST | | — | — |
| II. Agricultural Resources | | | | |
| a. Convert Farmland | NS | | — | — |
| b. Conflict with zoning or Williamson Act | NS | | — | — |
| c. Forest Land Conversion | NS | | — | — |
| d. Convert to non-forest/non-ag use | NS | | — | — |
| III. Air Quality | | | | |
| a. Conflict with AQ Plan | LST | | — | ▼ |
| b. Increase criteria pollutant | LST | | — | ▼ |
| c. Expose sensitive receptors to pollutants | LST | | — | ▼ |
| d. Odors | LST | | — | ▼ |
| IV. Biological Resources | | | | |
| a. Endangered species | LST-M | BIO-1 | — | ▼ |
| b. Riparian habitat | NS | | — | — |
| c. Wetlands | NS | | — | — |
| d. Movement of migratory species | NS | | — | — |
| e. Conflict with preservation policy/ordinance | LST-M | BIO-2 | — | ▼ |
| f. Conflict with adopted habitat plan | NS | | — | — |
| V. Cultural Resources | | | | |
| a. Historical resource | SU | CUL-2, CUL-3, CUL-4 | ▼ | ▼ |
| b. Archaeological resource | LST-M | CUL-1 | — | ▼ |
| c. Human remains | NS | | — | — |

| Issue Area | Proposed Project | Mitigation Measure | Alternatives | |
|--|------------------|---------------------|--|------------------------|
| | | | 1 <i>Redesign Project to be Consistent with Historic Preservation Standards</i> | 2 <i>No Project</i> |
| VI. Energy | | | | |
| a. Wasteful use of energy | | | — | — |
| b. Conflict with policies | | | — | — |
| VII. Geology and Soils | | | | |
| a. Alquist-Priolo fault, seismic, landslides, liquefaction | LST to NS | | — | — |
| b. Soil erosion | NS | | — | — |
| c. Unstable geologic unit | NS | | — | — |
| d. Expansive soil | NS | | — | — |
| e. Septic system support | NS | | — | — |
| f. Paleontological resources | LST-M | CUL-1 | — | ▼ |
| VIII. Greenhouse Gas (GHG) | | | | |
| a. Generate GHG | LST | | — | — |
| b. Conflict with policy | LST | | — | — |
| IX. Hazards/Hazardous materials | | | | |
| a. Transport | LST | | — | — |
| b. Upset/Release | LST-M | HAZ-1 | — | ▼ |
| c. Handling near schools | LST-M | HAZ-1, HAZ-2 | — | ▼ |
| d. Haz waste site Proximity | LST | | — | — |
| e. Airport hazards | NS | | — | — |
| f. Evacuation plan interference | LST-M | HAZ-2, HAZ-3 | — | ▼ |
| g. Wildland fire exposure | NS | | — | — |
| X. Hydrology/Water Quality | | | | |
| a. Water quality standards violation | LST | | — | — |
| b. Decrease groundwater supplies | LST | | — | — |
| c. Alter site drainage patterns | NS | | — | — |
| d. Release pollutants in a flood | NS | | — | — |
| e. Conflict with groundwater management plans | NS | | — | — |
| XI. Land Use and Planning | | | | |
| a. Physically divide community | NS | | — | — |
| b. Conflict with policies | SU | CUL-2, CUL-3, CUL-4 | ▼ | ▼ |

| Issue Area | Proposed Project | Mitigation Measure | Alternatives | |
|---|------------------|------------------------------|--|------------------------|
| | | | 1 <i>Redesign Project to be Consistent with Historic Preservation Standards</i> | 2 <i>No Project</i> |
| XII. Mineral Resources | | | | |
| a. Loss of state resources | NS | | — | — |
| b. Loss of local resource | NS | | — | — |
| XIII. Noise | | | | |
| a. Temp or per above established standards | LST-M | NOI-1 | — | ▼ |
| b. Groundborne vibration | LST | | — | ▼ |
| c. Airport noise | NS | | — | — |
| XIV. Population and Housing | | | | |
| a. Induce growth | NS | | — | — |
| b. Housing displacement and new | NS | | — | — |
| XV. Public Services | | | | |
| a. Fire | LST | | — | — |
| b. Police | LST | | — | — |
| c. Schools | LST-M | PS-1, PS-2, PS-3, PS-4, PS-5 | — | ▼ |
| d. Parks | LST | | — | — |
| e. Other | LST | | — | — |
| XVI. Recreation | | | | |
| a. Increase use of other facilities | LST | | — | ▲ |
| b. Build new or expand other rec facilities | LST | | — | ▲ |
| XVII. Transportation/Traffic | | | | |
| a. Conflict with plans | LST | | — | — |
| b. Vehicle miles traveled | LST | | — | — |
| c. Hazardous design feature | NS | | — | — |
| d. Inadequate emergency access | LST | | — | — |
| XVIII. Tribal Cultural Resources | | | | |
| a. Listed resource | LST-M | TCR-1 | — | ▼ |
| b. Local known resource | LST-M | TCR-1, TCR-2, TCR-3 | — | ▼ |

| Issue Area | Proposed Project | Mitigation Measure | Alternatives | |
|---|------------------|--------------------|--|------------------------|
| | | | 1 <i>Redesign Project to be Consistent with Historic Preservation Standards</i> | 2 <i>No Project</i> |
| XIX. Utilities and Service Systems | | | | |
| a. Require new or expanded services | LST | | — | — |
| b. Available water | LST | | — | — |
| c. Adequate wastewater | LST | | — | — |
| d. Solid waste | LST | | — | — |
| e. Solid waste policies | NS | | — | — |
| XX. Wildfire | | | | |
| a. Impair emergency evacuation | LST | | — | — |
| b. Exacerbate wildfire spread | NS | | — | — |
| c. Installation of fire breaks | NS | | — | — |
| d. Expose people to post-fire effects | NS | | — | — |

Notes:

SU = Potentially significant and unavoidable;

LTS-M = Less than significant with mitigation incorporated;

NS = Not significant or Less Than Significant Without Mitigation.

- ▲ Alternative is likely to result in greater impacts to issue when compared to Proposed Project.
- Alternative is likely to result in similar impacts to issue when compared to Proposed Project.
- ▼ Alternative is likely to result in reduced impacts to issue when compared to Proposed Project.

8 REFERENCES

- Architectural Resources Group, Inc., October 6, 2020 (ARG 2020). *City of San Marino Citywide Historic Resources Survey Report*.
- CalFire, <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones/-maps>, as accessed 6/18/21.
- Castillo, Edward D. 1978. "The Impact of Euro-American Exploration and Settlement," In *Handbook of North American Indians, Volume 8, California*, edited by R.F. Heizer, pp. 99-127. William C. Sturtevant, general editor. Smithsonian Institution, Washington D.C.
- California Office of Historic Preservation Department of Parks & Recreation (OHP) (March 2001), *Technical Assistance Series 1, California Environmental Quality Act (CEQA) & Historical Resources*.
- City of San Marino Municipal Code.
- City of San Marino, October 8, 2003. *Final Draft General Plan*.
- City of San Marino (February 5, 2018). *Huntington Drive Safe Streets Corridor Plan*.
- City of San Marino, February 13, 2019 (CSM, Feb 2019). *Local Hazard Mitigation Plan*.
- City of San Marino, May 2019. *City of San Marino Sewer System Management Plan*.
- Electric Railway Historical Association, "Sierra Madre Line" as accessed <http://www.erha.org/pensm.htm> on 6/19/2021.
- Federal Rail Administration (FRA) Guidelines (Report Number 293630-1), December 1998.
- gkk Works, December 21, 2017. *Program Needs Assessment Report Amendment 2017 for the San Marino Unified School District*. Amendment to Original Document prepared by Carmichael-Kem Architects.
- gkk Works, August 13, 2018. *Update to the 2013 Assessment of School Safety and Security Measures*.
- Linscott, Law & Geenspan (LLG), Sept 21, 2021. *Transportation Impact Study, San Marino Center Improvement Project*.
- Meyer, Mohaddes Associates, Inc., August 1994. *City of San Marino Circulation Element*.
- Office of Planning and Research (OPR), December 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA*.
- Personal Communication, June 5, 2021. Julie Gilbert interview with Gil Cardenas, San Marino Unified School District Maintenance and Operations Supervisor.

San Gabriel Basin Water Quality Authority, January 22, 2008 (SGBWQA, January 2008). *San Gabriel Basin Groundwater Quality Management and Remediation Plan §406 Plan*.

San Marino Tribune, January 7, 2016. *A Tradition of Volunteerism: San Marino Woman’s Club*.

State Water Resources Control Board Geotracker, as accessed 6/6/21:

<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=1800+Huntington+Drive%2C+San+Marino#>.

State of California, Department of Conservation, Farmland Mapping and Monitoring Program. <https://maps.conservation.ca.gov/DLRP/CIFE>, as accessed May 22, 2021.

State Water Resources Control Board Geotracker, as accessed 6/6/21:

<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=1800+Huntington+Drive%2C+San+Marino#>.

U.S. Department of the Interior, National Park Service, Cultural Resources (1997). *How to Apply the National Register Criteria for Evaluation*.

United States Dept of Agriculture, Natural Resources Conservation Service, Web Soil Survey, <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>, as accessed May 22, 2021 (USDA May 2021).

Vista Environmental Consulting (Vista), November 29, 2021. *Comprehensive Hazardous Materials Survey Report*.

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APPENDIX A

NOTICE OF PREPARATION AND NOP COMMENTS



DRAFT ENVIRONMENTAL IMPACT REPORT
San Marino Center Improvement Project
SCH No. 2022010094

Notice of Preparation



Comments Received on Notice of Preparation



DRAFT ENVIRONMENTAL IMPACT REPORT
San Marino Center Improvement Project
SCH No. 2022010094

Scoping Meeting Materials and Comment Summary
January 12, 2022



APPENDIX B

**CHATEL HISTORIC PRESERVATION ARCHITECT TECHNICAL MEMO,
NOVEMBER 15, 2021**



APPENDIX C

PROPOSED SITE PLAN, LAYOUT AND LANDSCAPE PLANS



APPENDIX D

**TRAFFIC IMPACT STUDY – SAN MARINO IMPROVEMENT PROJECT,
FEBRUARY 23, 2022**



APPENDIX E

**TRAFFIC CIRCULATION REVIEW FOR HUNTINGTON MIDDLE SCHOOL,
JULY 31, 2018**



APPENDIX F

**INITIAL STUDY – SAN MARINO CENTER IMPROVEMENT PROJECT,
JANUARY 2022**
