



# City of San Marino 2021-2029 Housing Element Update

Initial Study – Negative Declaration

*prepared by*

**4LEAF, Inc.**

2126 Rheem Drive  
Pleasanton, CA 94588

*and*

**McNulty Consulting**

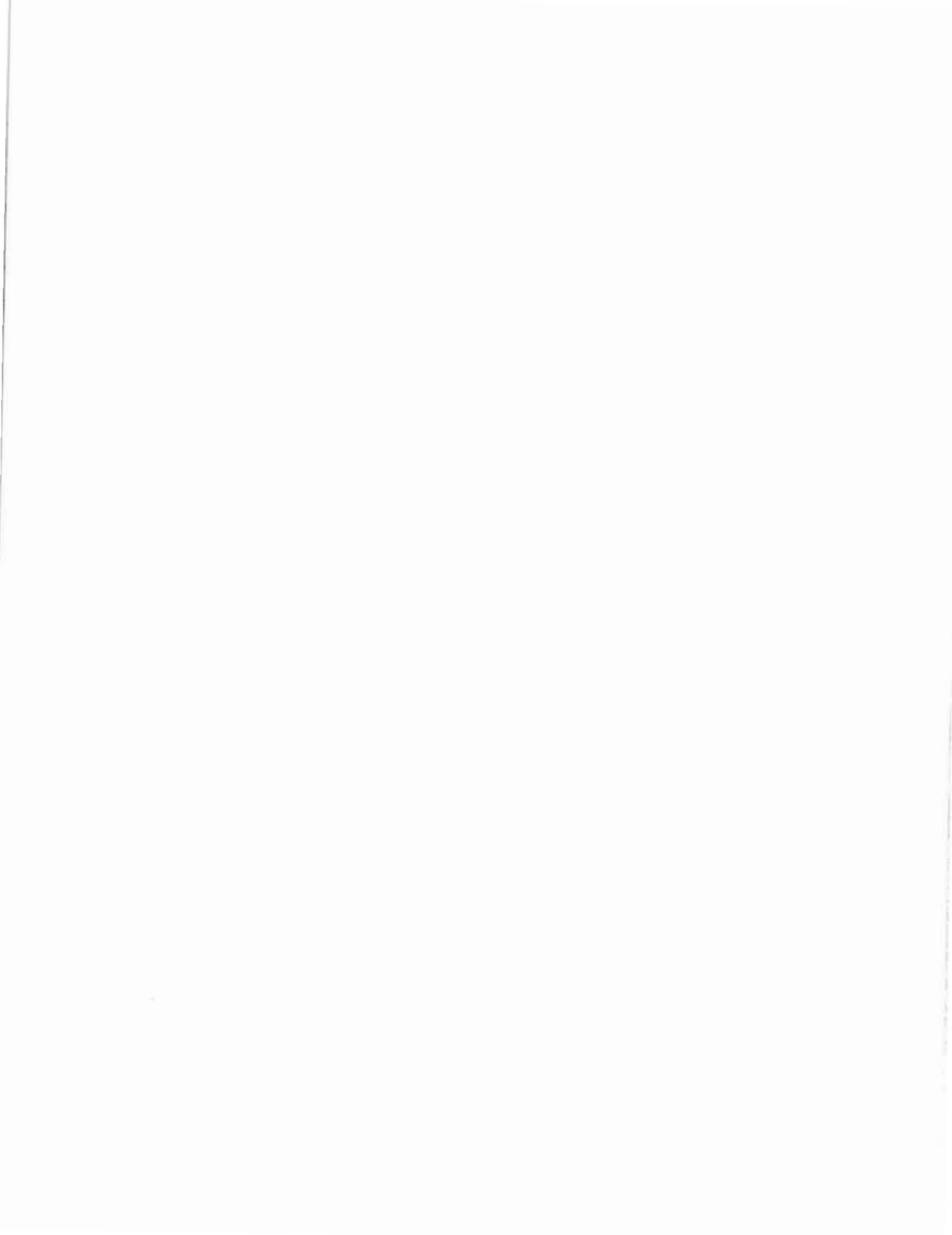
3905 State Street, Suite 7181  
Santa Barbara, CA 93105

*prepared for*

**City of San Marino**

Department of Community Development  
2200 Huntington Drive  
San Marino, CA 91108

**January 2022**



# City of San Marino 2021-2029 Housing Element Update

Initial Study – Negative Declaration

*prepared by*

**4LEAF, Inc.**  
2126 Rheem Drive  
Pleasanton, CA 94588

*prepared for*

**City of San Marino**  
Department of Community Development  
2200 Huntington Drive  
San Marino, CA 91108

**January 2022**

*This report prepared on 50% recycled paper with 50% post-consumer content.*

# Table of Contents

Initial Study .....	1
1. Project Title.....	1
2. Lead Agency Name and Address .....	1
3. Contact Person and Phone Number .....	1
4. Project Location.....	1
5. Project Sponsor’s Name and Address .....	2
6. General Plan Designation .....	2
7. Zoning .....	2
8. Description of Project.....	2
9. Surrounding Land Uses and Setting.....	3
10. Other Public Agencies Whose Approval is Required.....	4
11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1? .....	4
Environmental Factors Potentially Affected .....	6
Determination .....	7
Environmental Checklist .....	9
1 Aesthetics .....	9
2 Agriculture and Forestry Resources .....	11
3 Air Quality .....	12
4 Biological Resources .....	13
5 Cultural Resources.....	15
6 Energy .....	16
7 Geology and Soils .....	17
8 Greenhouse Gas Emissions.....	21
9 Hazards and Hazardous Materials .....	22
10 Hydrology and Water Quality.....	25
11 Land Use and Planning .....	29
12 Mineral Resources.....	30
13 Noise.....	31
14 Population and Housing .....	33
15 Public Services.....	34
16 Recreation.....	36
17 Transportation.....	37
18 Tribal Cultural Resources .....	39
19 Utilities and Service Systems .....	41
20 Wildfire.....	43
21 Mandatory Findings of Significance .....	45
References .....	47
Bibliography .....	47

List of Preparers ..... 47

**Tables**

Table 1: Regional Housing Needs Allocation for the 2021-2029 period.....3

**Figures**

Figure 1 Project Location..... 1

# Initial Study

## 1. Project Title

City of San Marino 2021-2029 Housing Element Update

## 2. Lead Agency Name and Address

City of San Marino, Community Development Department

2200 Huntington Drive, 1st Floor San Marino, CA 91108

## 3. Contact Person and Phone Number

Alex Hamilton, Interim Director of Community Development

(626) 300-0713

## 4. Project Location

Citywide. As an element of the City of San Marino's General Plan, the Housing Element Update will apply to all properties in the City for the 2021-2029 planning period. The City of San Marino is located in the center of the County of Los Angeles, south of the San Gabriel Mountains and approximately 11 miles north of the City of Los Angeles. The cities of Pasadena, South Pasadena, San Gabriel, and Alhambra surround San Marino. See Figure 1 below.



Esri, HERE, Garmin, FAO, USGS, NGA, EPA, NPS

## 5. Project Sponsor's Name and Address

City of San Marino, Department of Community Development  
2200 Huntington Drive, 1st Floor San Marino, CA 91108

## 6. General Plan Designation

Citywide – various

## 7. Zoning

Citywide – various

## 8. Description of Project

The City of San Marino is proposing to adopt an update of its Housing Element for the 2021 to 2029 period. State law requires each city to update its Housing Element every eight (8) years and submit it for certification to the California Department of Housing and Community Development (HCD). This is the 6<sup>th</sup> Housing Element update cycle since the California Legislature identified housing as a priority statewide and began regular updating to General Plan Housing Elements, including the City of San Marino. The current update process started in November 2020 when the city engaged the 4LEAF, Inc consulting team to lead the draft update. The Draft Housing Element was transmitted to HCD on November 1, 2021. Subsequently, McNulty Consulting was engaged by the city in December 2021 to lead the adoption phase

A major component of the Housing Element update is the City's shortage of adequate sites to meet the regional housing need. The regional housing need allocation (RHNA) is an estimate of the city's housing needs at all price levels, based on the existing population plus its projected growth, over the next eight years. HCD determines the housing needs for each region in the state and provided to the representative area associations of governments who distributes the RHNA to the cities and counties. The total units estimated for the entire Southern California region were distributed by the Southern California Association of Governments (SCAG).

The RHNA for the City of San Marino's 6<sup>th</sup> cycle (2021 to 2029 period) Housing Element is 397 units (see Table 1, below). The City is not required to construct additional housing units or issue building permits to meet the RHNA allocation, but it must make adequate sites available with appropriate residential zoning and development potential to accommodate the RHNA over the 8-year planning period. To do this, the City is required to evaluate land use patterns, development regulations and challenges, and identify potentially developable land to demonstrate how the City plans to accommodate the City's RHNA allocation. Because San Marino currently lacks sufficient sites with appropriate zoning to accommodate its assigned RHNA, this Housing Element Update includes programs to consider sites for rezoning. Parcel-specific CEQA analysis will be conducted for the housing element rezoning project. Attempting to analyze individual rezoning on a parcel-by-parcel basis at this time would be speculative and is not within the scope of the project evaluated in this Initial Study.

This Initial Study/Negative Declaration (IS-ND) provides compliance with the California Environmental Quality Act (CEQA) Guidelines required for the city to analyze and adopt the 2021 Housing Element Update, and focuses on whether the Project, as defined, may cause significant effects on the environment. Consistent with CEQA Guidelines Section 21083.3, this IS-ND is intended to assess any effects on the environment that are specific to the 2021 Housing Element Update at a plan level. The location and extent of any specific development project(s) that might result from the adoption of the 2021 Housing Element Update are not yet known, and any attempt to analyze them within this document would be speculative.

**Table 1: Regional Housing Needs Allocation for the 2021-2029 period.**

Income Levels				Total
Below Low	Low	Moderate	Above Moderate	
149	91	91	66	397

## 9. Surrounding Land Uses and Setting

San Marino is a small city within the large and diverse Los Angeles County. While San Marino is served by the nearby freeway network (710, 210 and 134) and by the Metro bus lines 78/79/379, it does not have high-speed rail services and does not contain any Priority Growth Areas envisioned in Connect SoCal 2020-2045. San Marino's 2020 population of 12,870 represents a decrease from the 2010 population of 13,187. This lack of growth is consistent with that of the County of Los Angeles and the State of California, both of which have recently begun decreasing in population (2019 Census).

Incorporated in 1913, San Marino was almost completely built out by the 1970s. San Marino is characterized by its beautiful homes and has multiple historic neighborhoods and structures. The intention of the City's founding fathers was to develop and maintain a residential area that would be high-quality and crime-free that provides great schools, parks, and an exclusive lifestyle. The City's physical form today reflects those early values and development patterns, as most of the land is designated for residential use, with areas of recreational and commercial uses. The City's lack of vacant parcels and subdivision potential has impeded development since the 1970s: an average of less than 6 new home permits have been issued annually since 1980, not counting Accessory Dwelling Units.

## **10. Other Public Agencies Whose Approval is Required**

None

## **11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?**

No Native American Tribes requested consultation in regard to this project.

*This page intentionally left blank.*

# Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning                  | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                 | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

# Determination

Based on this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
\_\_\_\_\_  
Signature

Alex Hamilton  
\_\_\_\_\_  
Printed Name

1-11-2022  
\_\_\_\_\_  
Date

Interim Director, Community  
Development Department

\_\_\_\_\_  
Title

# Environmental Checklist

## 1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Except as provided in Public Resources Code Section 21099, would the project:

a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a. Would the project have a substantial adverse effect on a scenic vista?*

The entire city is urbanized and there are no local or state designated scenic vistas or state scenic highways within the city or its immediate vicinity. The project would not have the potential to have a substantial adverse effect on a scenic vista and would therefore, have no impact on a designated scenic vista.

**NO IMPACT**

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

There are no State scenic highways within the city or in the near vicinity. Therefore, the project would not have the potential to substantially damage scenic resources along a state scenic highway.

**NO IMPACT**

- c. *Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?*

The project site is an urbanized area subject to the Design Review requirements in Article 15 of the San Marino City Code applies to new or replacement structures and changes to structures visible from public views. Objective design review requirements apply to new housing construction that would be expected to affect public views. The project does not propose specific development projects that would conflict with applicable design regulations governing scenic quality. Specific development projects would be speculative at this time but in the future would be subject to the latest Article 15 regulations or other regulations protecting scenic quality in place at the time future residential development is proposed. Additionally, the city has adopted Objective Design Standards that would apply to visual quality of design features. Therefore, project approval would have a less than significant impact by conflicting with regulations governing public views or scenic quality.

**LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?*

Although the Housing Element Update itself does not propose any specific development with lighting or glare components, its policies would encourage new housing construction that would be expected to create new sources of lighting and windows. City Code Sec. 23.15.03.B indicates that new or replacement residential structures are subject to design review. The Community Development Department, Planning Commission and Design Review Committee ensure that new development follows the latest Building Code and design standards to prevent light pollution and glare from windows or other components from a building. Additionally, as discussed in the previous section, the city is adopting Objective Design Standards that address lighting impacts. The project is not expected to create a new source of substantial light or glare that would adversely affect daytime or nighttime view in the area.

**LESS THAN SIGNIFICANT IMPACT**

## 2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

There is no farmland, or land zoned for agricultural use or forest land in the city or its near vicinity; therefore, the project would not have any impact on farm, agricultural, or forestry resources.

**NO IMPACT**

### 3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Housing Element does not propose land use changes that would allow high pollutant uses such as industrial; however, it does encourage more residential density which may increase automobile traffic. In order to help prevent an impact to traffic, the Housing Element has an implementation policy encouraging development near existing transit facilities. Goal 1 is to provide a range of housing opportunities for all income levels, and one of its policies is to allow interior conversion of single-family residences into duplexes or triplexes in neighborhoods near jobs and transit. The approval of the Housing Element also does not automatically allow new construction; however, it encourages building residential units. Policies and land uses allowing an increased range of residential densities adjacent to employment may increase opportunities to reduce single vehicle commuting and greater use of transit, which in turn could result in fewer vehicle emissions. Construction for these ends would be subject to use of the latest construction emissions reduction measures by the California Air Quality Board and not represent an impact to exceed federal, state, or regional air quality standards.

As such, implementation of the 2021 Housing Element will not have an impact on air quality, and no mitigation measures are necessary.

**NO IMPACT**

# 4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The city is almost entirely developed with built out. The few open spaces include parks, school fields, and the Huntington gardens. There are no wetlands, wildlife corridors, or adopted habitat

conservation plans. Future housing construction is speculative at this time; however, such projects would be subject to the federal Migratory Bird Treaty Act which protects nesting birds. Any future project related tree removals be subject to review consistent with the City of San Marino Heritage Tree Protection Ordinance in Article 19 of the City of San Marino Municipal Code. There is no potential for the project to have an impact on biological resources, per this section, as no open spaces are encouraged to be developed and all future development will be subject to all applicable regulations related to biological resources.

**NO IMPACT**

# 5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project proposal is to update the Housing Element, which stipulates future discretionary actions such as changing the zoning designations of some sites in order to increase the potential for housing. At the time future development projects are proposed, the City will review the proposal for potential impacts to historical resources as defined by the Guidelines to the Implementation of CEQA § 15064.5, 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.).

When zoning changes, historic status of subject properties would be assessed. However, much of the land in the city is already developed. Any future disturbance of native soils or disturbance of human remains, or artifacts would require assessment by a qualified archaeologist or a tribal cultural resources expert. All construction undergoes preliminary review for historic preservation review per Article 18 of the City Code and in some cases further design review. Since the specific location of future projects is speculative at this time the Housing Element Update project does not have a potential for impact on cultural resources.

**NO IMPACT**

## 6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The update of the Housing Element would not consume any energy by itself, but it encourages development for the construction of new residences and/or the remodel of existing structures to allow for more residences in the city. Short-term construction and long-term occupancy activities, as a result of future development, would result in energy consumption. Construction activities would consume energy to power equipment, transport equipment and vehicles, and construction materials to be manufactured. Occupancy of new residences would consume energy through the demand for electricity and gas for lighting, air conditioning, heating; and the residents' use of personal vehicles. However, future development would require permitting such as building and design review entitlements. Title 24, Part 6, of the California Code of Regulations; energy Conservation Standards for new residential buildings are updated every three years. Title 24 ensures building designs conserve energy by requiring the use of new energy efficiency technologies and methods in new developments. Currently, the California Energy Commission (CEC) Title 24 2016 Building Energy Efficiency Standards are in effect; they were updated in 2019 and the updates took effect on January 1, 2020. The city verifies compliance with the current versions of the California Building Code and Building Energy Efficiency Standards. Therefore, the proposed Housing Element Update project will not result in a potentially significant environmental impact due to wasteful or inefficient use of energy, and it will not conflict with state or local plans for renewable or efficient energy.

### **NO IMPACT**

# 7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

A portion of the Sierra Madre-San Fernando fault runs east-west through the city, roughly 1,000 feet north and parallel to Huntington Drive. The City regulates the construction of new habitable structures within the identified hazard areas, through the requirement of setbacks and construction standards in accordance with State law. Design and construction requirements related to seismic hazards are based on hazard mapping and Seismic Design Categories. The San Marino Municipal Code provides requirements and regulations for different Seismic Design Categories. These building requirements are likely to increase costs of housing development but are necessary to mitigate risks and minimize loss of life and property associated with these hazards.

**LESS THAN SIGNIFICANT IMPACT**

- a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

Any city with a fault zone, has the potential to experience earthquakes, which strength and time are unpredictable with specificity as to their time and location. These seismic events could put lives and property at risk. Additional residences which at this time are speculative, would also be exposed to these risks; however, and as mentioned in section a.1 above, State and City construction codes help minimize the risks for significant damage to people and property from strong ground shaking through soils and construction materials engineering and design standards. Future housing projects with locations that are speculative now, would be required to undergo review for compliance with the building code for structures in proximity to fault lines. The construction standards protect residents from adverse effects of ground shaking to the extent practicable. Therefore, the Housing Element Update project would have a less than significant impact related to potential adverse effects of ground shaking.

**LESS THAN SIGNIFICANT IMPACT**

- a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

There is no identified liquefaction or any other type of ground zones within the city that would increase the risk of loss, injury, or death due to a seismic event.

**NO IMPACT**

- a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

There is one potential landslide zone identified in the city due to its topography and barely developed soils, the Huntington Gardens property, which is a 207-acre civic use/historic site. The Housing Element update identifies the Huntington property as a potential site for the development of at least 20 units within 2 acres of the site. Should this site be developed in the future, its construction would be subject to strict Building Code regulations in place at the time development is proposed, to prevent any damage due to the existing landslide potential. Since the exact timing and specific nature of the project is speculative at this time, the Housing Element Update will have a less than significant impact due to the adverse effects of landslides.

### LESS THAN SIGNIFICANT IMPACT

*b. Would the project result in substantial soil erosion or the loss of topsoil?*

The project is a policy document and would not directly enable construction or development activities. Any future development within the city would be subject to State, regional, and local requirements related to the prevention of substantial soil erosion or the loss of topsoil. However, topsoil is assessed on a project-by-project basis through application of the City's most of the city is developed and not much native topsoil exists where development is encouraged by this project. All projects are, nonetheless, subject to City Code Article 16.10 requiring project sites shall be designed to minimize soil erosion, runoff, and water waste and submittal of a grading plan prepared by a civil engineer. As no specific housing projects are proposed with the project, the Housing Element Update will have no impact to soils erosion or result in the loss of topsoil.

### NO IMPACT

*c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

As previously mentioned, there are no liquefaction zones and only one landslide area in the city. Future development is to be evaluated on a site-specific basis and subject to all regulatory requirements on-place. Development codes applicable to projects enabled by the Housing Element Update project is expected to prevent impacts due to construction that would cause a landslide, lateral spreading, subsidence, liquefaction, or collapse of a geologic unit.

### NO IMPACT

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

According to soils survey data from the Los Angeles Rivers and Mountains Conservancy (RMC), the soil types within the City of San Marino are Ramona Loam, Ramona Sandy Loam, Hanford Fine Sandy Loam, and Hanford Gravelly Sandy Loam. None of these soil types are considered to be expansive soils, and therefore along with protective grading standards applicable to development projects, there is no risk to life or property from future housing projects enabled by this Housing Element Update being unsafely located on expansive soils.

### NO IMPACT

*e. Would the project 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?*

The soils in the city would be capable of adequately support the use of septic tanks if needed; however, the entire city is served by public sewer systems and the Housing Element Update project would have no impact to wastewater disposal.

### NO IMPACT

*f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

City of San Marino  
**Initial Study for 2021-2029 Housing Element Update**

There are no identified unique paleontological resources or geologic features in the city as identified in the Soils Survey of the San Gabriel Area (1901, Holmes)

**NO IMPACT**

## 8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Housing Element update is a policy document consistent with the City's General Plan and does not directly propose physical changes in the environment. The Housing Element update is a City-wide policy document and does not, in and of itself, approve specific future developments.

- a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

The project will not directly generate any GHG emissions; however, it may indirectly generate some GHG emissions as it encourages residential development. Future development of housing units could result in an increase in GHG emissions during both construction and occupancy phases; however, development will be subject to current best management practices and construction to State standards for energy efficient buildings. All construction will be subject to case-specific review by the Building and Fire Department and, in some cases, Design Review which further enforces efficient materials.

### LESS THAN SIGNIFICANT IMPACT

- b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The encouragement from this project to build more housing is due to the number of housing units the Southern California Association of Governments (SCAG) assigned to the City of San Marino. The number, which includes a break-down based on income/affordability levels, was assigned by SCAG by carefully considering their Sustainability Program. This Program is focused on a Sustainable Communities Strategy (SCS) which was developed per the State's Sustainable Communities and Climate Protection Act, approved in 2008 through Senate's Bill 375. This Act requires local governments to promote development in sustainable locations, preventing large GHG emissions. Following this principle, the Housing Element update encourages new housing to be built near transit and the principal corridor in the city Huntington Drive, especially for lower income groups. There is no applicable local GHG plan, policy, or regulation.

### NO IMPACT

# 9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located in 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 or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

The development of new housing units may involve the use and disposal of some materials labeled as hazardous; however, it would be subject to regulations mandated by the State's Building Code and reinforced by the city's own Construction and Demolition Debris Ordinance (found in Article 7 of Chapter IX of the City Code). Said ordinance involves multiple requirements including waste management plans and reporting when deemed necessary by the building officials, in order to prevent any damage to property or the environment.

**NO IMPACT**

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

As mentioned in subsection 9-a above, any transportation and disposal of hazardous materials are subject to strict regulations, which do not allow release of hazardous materials into the environment. Development of the missing housing units in the city would be expected to be phased and not interfere with the existing traffic patterns in a way that an accident would occur and release hazardous materials into the environment.

**NO IMPACT**

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

There are currently four schools within the city, and future development facilitated by this project may occur within 0.25 mile of an existing or future school. However, future development which may involve the transportation of hazardous materials will be subject to rigorous construction and disposal regulations, and potential impacts will be assessed and prevented through project-specific review by city staff.

**NO IMPACT**

- d. *Would the project be located on a site that is included on a list of hazardous material 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?*

No hazardous sites listed under Government Code Section 65962.5 exist within the city.

**NO IMPACT**

- 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 or excessive noise for people residing or working in the project area?*

There are no airport land use plans within the city, and the closest public use airport is the San Gabriel Valley Airport in El Monte at approximately 4 miles southeast of the city limits.

**NO IMPACT**

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Any future development within the city would be required to comply with the provisions of the San Marino Emergency Operations Plan. The project would also not interfere with the Local Hazard Mitigation Plan, as future housing would be scattered across the city and developed in areas already served by existing roads.

**NO IMPACT**

*g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

There are no wildlands in the city or its immediate vicinity.

**NO IMPACT**

# 10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

### **Water Supply & Quality**

The City of San Marino receives most of its potable water from groundwater sources at the Main San Gabriel and Raymond Basins. Additional water is acquired through purchases from the Metropolitan Water District of Southern California (MWDSC), who manages and distributes potable water to public agencies within Los Angeles County and other Southern California counties. MWDSC receives water from the Weymouth Treatment Plant, whose source comes from the Sacramento River Delta and Colorado River. The city is serviced by California American Water, who distributes water to residential and commercial areas and releases an annual water quality report for the jurisdiction.

### **Surface Water**

There is no known naturally occurring surface water feature in San Marino. However, the Rubio Wash, a channelized water feature beginning just west of the San Marino High School baseball field, converges with the Rio Hondo approximately 5 miles to the south. 15.6 percent of water supply is purchased from MWDSC, which is then treated with disinfectants such as chloramines before being distributed to the public.

### **Ground Water**

The city receives 84.4 percent of water supply from groundwater sources. The San Gabriel Basin is the main groundwater source for San Marino and is recharged through rainfall and runoff from adjacent mountains. The groundwater basin also receives imported water and applied water return flows.

Construction from housing development may impact water quality standards and groundwater supply due to temporary debris exposure and runoff during construction. Irrigation of residential landscapes and increased fertilizer use may decrease water quality standards. However, the city's stormwater management and discharge control ordinance 09.07.01 - 09.07.14 require demolition and construction projects to implement best management practices that minimize impacts to water quality. The city also requires permit applicants to show plans consistent with the landscape and irrigation regulations, and requires compliance with city ordinance chapter 23, article 16, sections 1-11. The Housing Element update is a policy document and will not physically or substantially violate water quality standards.

### **NO IMPACT**

- b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

California American Water (CAW) serves the whole City of San Marino and surroundings with the "San Marino System." This system is primarily supplied by groundwater sources in the Main San Gabriel and Raymond Basins. Representatives from CAW confirmed the system has enough water to serve the additional housing units per the new RHNA.

Construction of housing developments may increase total impervious surface areas, leading to cumulative impacts to groundwater recharge. Increased impervious surfaces from new construction can pose a threat to groundwater recharge, potentially drying out a source of recharge and diverting

water elsewhere leading to increased water volume in the street that drains into the wash. However, the jurisdiction is entirely developed. In addition, the city encourages permeable surface areas where feasible and drought-tolerant landscaping with little to no irrigation and fertilizer usage for new construction. As such, there is no substantial decrease in groundwater supplies.

**NO IMPACT**

*c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*

The existing drainage pattern is located beneath the surface and would not be substantially altered by construction or lead to substantial erosion.

**NO IMPACT**

*c.(ii) Would the project 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

The existing drainage pattern is located beneath the surface and would not be substantially altered by construction or lead to increased rate or amount of surface runoff.

**NO IMPACT**

*c.(iii) Would the project 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 that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The existing drainage pattern is located beneath the surface and would not be substantially altered by construction or significantly contribute to stormwater runoff.

**NO IMPACT**

*c.(iv) Would the project 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 impede or redirect flood flows?*

The existing drainage pattern is located beneath the surface and would not be substantially altered by construction or significantly impede flood flows.

**NO IMPACT**

*d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The project site is located approximately 23 miles inland from the ocean and is highly developed. In addition, the City of San Marino has been identified by the federal emergency management agency to be in Zone X, an area of minimal flood risk. As such, flood hazard, tsunami, or seiche zones do not pose a significant threat of inundation or release of pollutants to the area.

**NO IMPACT**

- e. *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The City of San Marino is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB), a semi-autonomous decision-making body under the State Water Resources Control Board who is responsible for the protection of surface water and groundwater quality. The RWQCB's Basin Plan contains policies and directives that protect water quality and its beneficial uses within the region. In addition, the city produced the "Sewer System Management Plan" (May 2019) pursuant to the provisions of the State Water Resources Control Board to manage waste discharge and sanitary sewer overflows. The City of San Marino has identified sources of pollution and is enforcing nationwide efforts from the National Pollutant Discharge Elimination System by implementing the Storm Water Management and Discharge Control Ordinance (Ord. 0-05-1181, 9-14-2005). Demolition and construction of residential projects of more than 1,000 square feet and tenant improvements of more than 3,000 square feet are required to divert a minimum of 50% construction debris from a landfill. In addition, the city adopted the "Model Water Ordinance" that promotes efficient water use through landscaping and irrigation efforts. The Housing Element update is a policy document that responds to the city's needs to fulfill their housing requirements and does not approve any specific projects. Specific projects are reviewed by the city for consistency with the above-mentioned regulations and plans. As such, the Housing Element update will not obstruct implementation of any water quality control plan or groundwater management plan.

**NO IMPACT**

# 11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*a. Would the project physically divide an established community?*

Since the city is characterized predominantly by single-family residences, the updated Housing Element aims to promote infill development where feasible. San Marino's fair share of new housing development (RHNA Allocation) is outlined in the Housing Element, which encourages infill development near commercial areas, public transportation, and other public services. Goals, policies, and programs of the update emphasize the provision of affordable housing, preventing displacement and preserving the quality of existing neighborhoods. Adoption of the Housing Element would not substantially divide the established community.

**NO IMPACT**

*b. Would the project 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?*

The Housing Element update is a policy document that encourages infill housing development, affordable housing provisions, and preservation of existing housing stock. The update does not physically cause significant environmental impact to the land use plan, its policies or regulation, and would not grant entitlements for any current or future projects that contribute to the city's projected housing needs.

**NO IMPACT**

# 12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

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

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

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

The project proposes some goals and policies to increase the site eligibility for residential in the City; however, no sites that are undeveloped or not zoned for development would be affected by the new measures. Additionally, no mineral resources valuable to the region are known to exist within the City.

**NO IMPACT**

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

As described in Subsection 12-a above, no valuable mineral resources are known to exist within the City and the project would not have an impact on this matter.

**NO IMPACT**

# 13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Housing is considered a noise-sensitive rather than a noise-generating land use. The primary source of ambient noise in San Marino’s residential neighborhoods is traffic. The Housing Element is a policy document and does not propose specific projects; rather, it outlines density requirements per RHNA allocations. Any future housing development projects would be subject to the General Plan Land Use and Noise policies and limits, as well as Zoning regulations and setbacks, Building Code requirements, standard conditions of approval, and project-specific environmental review as applicable. As such, the update will not result in substantial increase in ambient noise or vibration levels in the city.

**LESS THAN SIGNIFICANT IMPACT**

b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

The city’s general plan has identified traffic as being the main contributors to noise in neighboring residential areas. However, existing traffic noise is not considered to be a significant impact on new residential construction. In addition, the city’s general plan includes a noise element technical analysis that measured noise levels throughout specific sites of San Marino. The analysis concluded that noise levels along Huntington Drive are within a range considered conditionally acceptable for sensitive land

uses. Temporary noise levels and groundborne vibrations from new development as allocated by RHNA goals may impact the environment; however, as stated above, the general plan's noise element contains provisions for monitoring and mitigating noise impacts to sensitive land uses such as residential, library and schools. The Housing Element update in and of itself will not result in generation of excessive groundborne noise and vibration levels.

**NO IMPACT**

- 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?*

There are no public airports, private airstrips, or airport land use plan areas within the City; nor within two miles from the City limits.

**NO IMPACT**

# 14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

San Marino had a population of 13,048 persons in 2019 (US Census, 2019); this population has been relatively stable since 1970 when San Marino was built out. The draft housing element update includes goals to maintain the existing housing stock while providing housing opportunities for all income levels within the City. To accomplish the City’s fair share of RHNA goals, a total of 397 units would need to be built through the provision of ADU/ JADUs and with future consideration of limited rezoning efforts to allow for increased density. The Housing Element update is a policy document and does not propose specific development projects. Rather, it outlines policy provisions and recommendations for accommodating RHNA goals and does not induce substantial unplanned population growth either directly or indirectly.

**LESS THAN SIGNIFICANT IMPACT**

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project would not displace any people, as the update is proposing measures to increase the potential for housing within the City. Under state laws, if a development project were to be proposed on a site where existing housing units occupied by low-income households exist, special relocation measures would be required to avoid displacement. Substantial numbers of existing people of housing would not be affected by this Housing Element Update.

**NO IMPACT**

# 15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
1 Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2 Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3 Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4 Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5 Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a.1. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The housing element update is a policy document that increases opportunities for the provision of housing within the city, but it does not approve specific development projects in and of itself. Site-specific housing development occurs through the city’s permitting system and includes an evaluation of the sufficiency of local fire protection resources. Housing development necessitates nearby fire hydrants to mitigate adverse impacts to structures but would not require additional fire protection facilities due to the city’s built-out nature. Therefore, the housing element update does not require additional fire protection facilities and does not result in substantial adverse impacts to the facilities.

**LESS THAN SIGNIFICANT IMPACT**

a.2. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The housing element update will not result in substantial adverse impacts to police protection facilities.

**LESS THAN SIGNIFICANT IMPACT**

*a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The housing element update will not result in substantial adverse impacts to school or the provision thereof. New construction is required to pay school impact fees to the local school district which are used to maintain the level of services.

**LESS THAN SIGNIFICANT IMPACT**

*a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?*

The housing element update will not result in substantial adverse impacts to the provision or construction of parks.

**LESS THAN SIGNIFICANT IMPACT**

*a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The housing element update will not result in substantial adverse impacts to public facilities as it will consist of in-fill development with adequate infrastructure to serve future development.

**LESS THAN SIGNIFICANT IMPACT**

# 16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 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?*

The city contains two parks dedicated for open space and recreation: Huntington Gardens and Lacey Park. The 237 acres of open space provides a space for residents and visitors to recreate. The housing element update allows provisions for the projected increase of housing units, which may lead to increased usage of nearby parks and open space. Lacey Park is managed by the city’s Community Services Department and the recreation facilities are managed under a reservation system to limit large groups, and the trails are paved to limit physical degradation. As such, projected increases in housing units as outlined in the housing element will not lead to substantial physical deterioration.

**NO IMPACT**

- 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?*

Adoption of the housing element update does not include construction of any facilities and thus would not have a physical impact on the environment.

**NO IMPACT**

# 17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

The proposed housing element update, being a plan level document creating no new physical features, would not conflict with programs, plans, ordinances, or other policies related to circulation. Future development influenced by the updated housing element would be created in already developed areas. There would be no impact from the proposed project.

**NO IMPACT**

b. *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

The proposed housing element update, being a plan level document creating no new physical features, would not conflict with the CEQA guidelines outlined in section 15064.3, subdivision (b). The adoption of the updated housing element would not result in the direct creation of traffic or the addition of Vehicle Miles Travelled. The impact of the proposed housing element update would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

The proposed housing element update would not create any physical features or cause changes to the existing transportation infrastructure. The proposed project could result in

the future development of new housing; however, because the City of San Marino is already completely developed, no new roads would be required to serve this future development. There would be no impact from the proposed housing element update.

**NO IMPACT**

*d. Would the project result in inadequate emergency access?*

The proposed housing element would not create any physical structures or other features requiring emergency services. Future housing development influenced by the proposed housing element would be located in already developed areas with established emergency services and access. Impacts from the proposed housing element would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

# 18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

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

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*a - b. Would the project cause a substantial adverse change to a resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or a resource determined to be significant pursuant to Public Resources Code section 5024.1*

The City of San Marino is completely developed, leaving no undisturbed areas. The proposed housing element would not create any physical features and has no potential to impact tribal cultural resources as defined in Public Resources Code Section 21074, a resource listed in a state or local historical register as defined in Public Resources Code Section 5020.1(k). Tribal consultation was not requested in the preparation of this document. Future development influenced by the housing element has the potential to unearth previously undiscovered tribal cultural resources. However, standard project conditions of approval would require that any newly discovered resources be protected, and that work be halted while the new discovery is addressed. No tribal cultural resources

in the City have been identified by the lead agency as being significant. Therefore, the proposed housing element would have a less than significant impact to tribal cultural resources.

**LESS THAN SIGNIFICANT IMPACT**

# 19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Would the project:

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The proposed housing element update; being a plan level document with no construction components, would not result in the creation of new utility and service system facilities. Future construction influenced by the proposed housing element has the potential to require connections to natural gas, wastewater treatment and other services typical of residential development. However, any future development would be infill and would be served by infrastructure that is already in place. Impacts to utilities and service systems would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

The proposed housing element update would create no new residences or other construction requiring water usage. Water supplies would not be affected by the implementation of the proposed housing element update. Future development influenced by the housing element would require water. However, sufficient supply is available to meet the demand and is expected to be sufficient even in drier years. Impacts from the proposed housing element would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- c. *Would the project 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?*

The proposed housing element update would create no new construction or result in new demand for wastewater services. Future construction that may result from the proposed housing element update would require sewer services. The Sanitation District overseeing the area has expressed confidence that the projected new demand would not exceed their ability to provide services. Impacts from the proposed housing element would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- d. *Would the project 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?*

The proposed housing element update would create no new construction or result in new demand for solid waste services. Future development influenced by the proposed housing element would require solid waste services. However, it is not expected that the projected increase in housing will create a demand for solid waste services that would exceed the capacity of local infrastructure. Impacts from the proposed housing element update would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

- e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The proposed housing element update would not create any demand for solid waste services. Future development would require solid waste services. Future development would be required to comply with all federal, state, and local guidelines regarding solid waste. Impacts from the proposed housing element update would have a less than significant impact.

**LESS THAN SIGNIFICANT IMPACT**

## 20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The City of San Marino is not located within a State Responsibility Area (SRA) or within a Very High Fire Hazard Severity Zone (VHFHSZ) as classified by CAL FIRE. No SRA or VHFHSZ exists within two miles of the city. The proposed housing element update would not alter any physical infrastructure or other features that could have an impact on emergency responses. There would be no impact from the proposed housing element update.

### NO IMPACT

- b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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 a wildfire?*

The City of San Marino is not located within a State Responsibility Area (SRA) or within a Very High Fire Hazard Severity Zone (VHFHSZ) as classified by CAL FIRE. No SRA or VHFHSZ exists within two miles of the city. The proposed housing element update would not directly create any new development or other physical features. Fire hazards would not be exacerbated as a result of the project. There would be no impact from the proposed housing element update.

**NO IMPACT**

*c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The City of San Marino is not located within a State Responsibility Area (SRA) or within a Very High Fire Hazard Severity Zone (VHFHSZ) as classified by CAL FIRE. No SRA or VHFHSZ exists within two miles of the city. No physical development would be created as a result of the housing element update. Any housing development influenced by the housing element update would be infill and would be served by infrastructure that is already in place. There would be no impact from the proposed housing element update.

**NO IMPACT**

*d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The City of San Marino is not located within a State Responsibility Area (SRA) or within a Very High Fire Hazard Severity Zone (VHFHSZ) as classified by CAL FIRE. No SRA or VHFHSZ exists within two miles of the city. The housing element update is a policy document and would not create or give entitlements to any individual project. No component of the project would exacerbate the risk of wildfire or create additional post-fire hazards. There would be no impact from the proposed housing element update.

**NO IMPACT**

# 21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
--	--------------------------------	--	------------------------------	-----------

Does the project:

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

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

c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

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

The proposed project is a policy document meant to regulate and facilitate the creation of housing. The project would not create any housing or other physical development. The project would not permit any project or grant any entitlements for future projects. Future development of sites identified for housing would not have significant effects on biological or historical resources for the reasons outlined in the above study. Impacts from the project would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

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

The proposed project is a policy document meant to regulate and facilitate the creation of housing. The project would not create any housing or other physical development. No cumulatively considerable impacts could result from the proposed project. Future housing development influenced by the project may have the potential to cause impacts to the environment, however such future projects are unknown and attempting to evaluate future impacts would be speculative. There would be no significant impacts from the proposed Housing Element Update project.

**NO IMPACT**

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

The proposed project is a policy document meant to regulate and facilitate the creation of housing. The project would not create any housing or other physical development. As outlined in the above study, the project would have no significant impacts or substantial adverse impacts to human beings. Impacts from the proposed project would be less than significant.

**LESS THAN SIGNIFICANT IMPACT**

# References

## Bibliography

[ ]

California American Water 2020 Annual Water Quality Report

(<https://www.amwater.com/ccr/sanmarino.pdf>)

City of San Marino 2001 General Plan

(<https://www.cityofsanmarino.org/Final%20General%20Plan.pdf>)

City of San Marino Public Works

([https://www.cityofsanmarino.org/government/departments/parks\\_public\\_works/water.php](https://www.cityofsanmarino.org/government/departments/parks_public_works/water.php))

City of San Marino Sewer Management Plan May 2019

(<https://www.cityofsanmarino.org/Parks%20&%20Public%20Works/Sewer%20System%20Management%20Plan.pdf>)

Environmental Protection Agency 2014 Basin Plan (<https://www.epa.gov/sites/default/files/2015-03/documents/ca4-losangeles-region.pdf>)

Main San Gabriel Basin (<https://www.watermaster.org/basin-map>)

Metropolitan Water District of Southern California ([https://thehawkinscompany.com/wp-content/uploads/2021/01/metro\\_water\\_district\\_v6.pdf](https://thehawkinscompany.com/wp-content/uploads/2021/01/metro_water_district_v6.pdf))

Soil Survey of the San Gabriel Area, California, 1901.

([https://www.nrcs.usda.gov/Internet/FSE\\_MANUSCRIPTS/california/sangabrielCA1901/sangabrielCA1901.pdf](https://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/sangabrielCA1901/sangabrielCA1901.pdf))

US Census 2019 (<https://www.census.gov/quickfacts/sanmarinocitycalifornia>)

## List of Preparers

4LEAF, Inc. and McNulty Consulting prepared this IS-ND under contract to the City of San Marino. Persons involved in data gathering analysis, project management, and quality control are listed below.

### **4LEAF, INC.**

Eduardo Hernandez, Senior Planner

Elliott Pickett, Associate Planner

Nick Bateman, Associate Planner

Denise Truong, Assistant Planner

Jane Riley, AICP, Director of Housing Policy

Tocarra Thomas, AICP, Deputy Director of Planning Services

**MCNULTY CONSULTING**

Bret McNulty, Principal