



PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

STAFF REPORT

DATE: DECEMBER 17, 2020

TO: PLANNING COMMISSION

FROM: DAVID M. REYES, DIRECTOR OF PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

SUBJECT: STUDY SESSION
PLANNED DEVELOPMENT #37
740-790 E. GREEN STREET, 118 S. OAK KNOLL AVENUE, AND 111 S. HUDSON AVENUE

RECOMMENDATION:

This report is for information only to inform the Planning Commission of the proposed Planned Development #37 and related environmental review.

EXECUTIVE SUMMARY:

A Planned Development is proposed for a 2.33 acre site on the south side of E. Green Street between S. Oak Knoll Avenue and S. Hudson Avenue. All five existing buildings, ranging in height from one-story to five-stories, would be demolished to facilitate the Project: a four- and five-story mixed-use residential and commercial project over two levels of subterranean parking. The total size would be approximately 254,000 square feet, and would include 263 rental units (41 of which would be designated as affordable units), ground floor commercial space (e.g., office, retail, café), lobby area, a leasing office, business center, fitness center, and pool lounge, as well as bicycle parking and mechanical equipment areas within two subterranean parking levels with 443 parking spaces. The Project also includes outdoor community open space, including a publicly accessible 'pocket park', breezeways, swimming pool courtyard, roof terraces, as well as indoor community open space and private open space (i.e. balconies).

The proposed Project would require a zone change from CD-4 to Planned Development No. 37 (PD-37) in order to increase the maximum allowed density from 60 dwelling units per acre to 87.

The Project also proposes to use the State Density Bonus legislated by the California Government Code Section 65915 to develop 263 for-rent apartment units (30 percent above the proposed 87 dwelling units per acre). Because the proposed Project would include 20 percent on-site affordable housing units, the Project would comply with the City's Inclusionary Housing Ordinance, which would allow the Project to utilize the Affordable Housing Concession Menu to increase the Project's floor area ratio (FAR) from 2.0 to 2.5 and to increase the building height 12 feet above the allowed height limit of 35 feet along Green Street in the northern portion and 50 feet along Hudson Avenue and Oak Knoll Avenue in the southern portion. With incorporation of

the City's Affordable Housing Concession Menu, the proposed 4-story building would be built to a maximum height of 47 feet and the proposed 5-story building would be built to a maximum height of 62 feet.

The Planned Development would require the following approvals:

- Zoning Map Amendment;
- Planned Development Plan;
- Public Tree Removal;
- Private Tree Removal; and
- Design Review.

A Draft Initial Study / Mitigated Negative Declaration has been completed for the Project and has been made available for public review and comment from December 3, 2020 to January 4, 2021. The Draft Initial Study / Mitigated Negative Declaration identified potentially significant effects related to the following topics: Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Recreation, Transportation, and Tribal Cultural Resources. With the incorporation of mitigation measures it was determined that all potentially significant effects would be reduced to a less than significant level.

Upon completion of the Final Initial Study / Mitigated Negative Declaration, the Planning Commission will consider the Final Initial Study / Mitigated Negative Declaration, the Planned Development, and related entitlements, and will be asked to make recommendations to the City Council for its consideration.

BACKGROUND:

Planned Developments

The proposed Project would establish a new Planned Development for the entire site, as provided by Section 17.26.020.C (Purpose and Applicability of Special Purpose Zoning Districts – Planned Development (PD) District) of the Zoning Code. The PD District is intended for sites of two acres or more in size where an applicant proposes, and the City desires, to achieve a particular mix of uses, appearance, land use compatibility, or special sensitivity to neighborhood character. The specific purposes of the PD district as outlined in the Zoning Code are to:

- a. Establish a procedure for the development of large parcels of land in order to reduce or eliminate the rigidity, delays, and inequities that otherwise would result from application of land use regulations and administrative procedures designed primarily for small parcels;
- b. Ensure orderly and thorough planning and review procedures that will result in quality urban design;
- c. Encourage variety and avoid monotony in large developments by allowing greater freedom in selecting the means to provide access, light, open space, and amenity;
- d. Allow certain types of development consist with the General Plan that can be acceptable at a specific location only under standards significantly more restrictive than those of a base district in which the use is permitted;
- e. Provide a mechanism whereby the City may authorize desirable developments in conformity with the General Plan without inviting speculative rezoning applications that if granted, often could deprive subsequent owners of development opportunities that do not necessarily result in construction of the proposed facilities;

- f. Encourage allocation and improvement of common open space in residential areas, and provide for maintenance of the open space at the expense of those who will directly benefit from it;
- g. Encourage the preservation of serviceable existing structures of historic value or artistic merit by providing the opportunity to use them imaginatively for purposes other than that for which they were originally intended; and
- h. Encourage the assembly of properties that might otherwise be developed in unrelated increments to the detriment of surrounding properties.

Planned Developments are seen as a way to provide more flexibility from zoning standards on a project-by-project basis, provided the project remains consistent with the General Plan.

Review Process

The review process for a proposed Planned Development is outlined in Sections 17.26.020.C.3.d (Commission and Council Action), 17.61.030.I.b (Design Conditions), and 17.74 (Amendments) of the Zoning Code. This process begins with Design Commission review of the Planned Development on aesthetic and urban design issues related to architecture, landscaping, site plan, and related aesthetic issues, as well as historic preservation. This review occurred on December 8, 2020 and will be provided to the Planning Commission and City Council as part of their respective formal reviews of the proposed Planned Development. Following Design Commission review, the Planning Commission would conduct a public hearing and make a recommendation to the City Council on whether to approve, approve with modifications, or disapprove the proposed zone map amendment, based on the findings contained in Section 17.74.070 (Findings and Decision), below:

- 1. The proposed amendment is in conformance with the goals, policies, and objectives of the General Plan; and
- 2. The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

Subsequent to the Planning Commission hearing and recommendation, the City Council would hold a public hearing to consider the recommendations of the Design and Planning Commissions, and hear evidence regarding the amendment (PMC Section 17.74.060 – Council Action on Amendment). The City Council shall then approve, approve with modifications, or disapprove the proposed amendment based on the findings described above. Approval of the PD District requires simultaneous approval of a PD Plan. The PD Plan identifies allowed or conditionally allowed uses, applicable development standards for the PD, and conditions of approval related to the project. Should the City Council approve the required entitlements, the project would then require Design Review approval by the Design Commission prior to issuance of any building permits.

At this time, the Planning Commission is not being asked to make a formal recommendation on the Project or the environmental review. That public hearing will be noticed and held at a future date, upon completion of the Final Initial Study / Mitigated Negative Declaration.

Project Evolution

In October 2017, the applicant submitted a Predevelopment Plan Review (PPR) application that solicited City comment on a proposed Planned Development. A PPR application is required by the Zoning Code for all Planned Development applications in order to achieve higher quality projects through early consultation between City staff and applicants, to identify issues that may arise during application processing such as community concerns, to achieve consistency with City regulations and policies, and to avoid significant investment in the design of a project without preliminary comments from City staff. Larger projects, such as the proposed Planned Development, are also presented to the City Council so the applicant may have the benefit of comments from the City Council and the community. The PPR was presented to the City Council in July 2018.

During the PPR process, the Project was reviewed and commented on by Design & Historic Preservation staff and the Design Commission through the Preliminary Consultation process. The meeting with the Design Commission occurred in January 2018.

Based on these preliminary reviews and comments from the City Council, Design Commission, City staff, and the community, the applicant refined the Project and submitted a formal application for a Planned Development in July 2018. Subsequently, the applicant submitted a revised Planned Development application in December 2019, which is the currently-proposed project. The project evolution is summarized in Table 2 below.

Table 2. Project Evolution

	PPR Submittal	First PD Submittal	Revised PD Submittal
Total Floor Area (sf)	304,836	304,307	253,917
Floor Area Ratio	3.00	3.00	2.50
Community Space (sf)	52,874	49,684	39,483
Residential Units	273	273	263
Height (feet):			
Green/Oak Knoll	63	51	31
Green/Hudson	45	49	35
Oak Knoll	77	77	54
Hudson	82	81	62
Parking:			
Residential	410	407	378
Non-residential	53	85	65
Total	463	492	443

PROJECT DESCRIPTION:

The proposed project (Project) would involve the demolition of five commercial buildings and the construction and operation of a new mixed-use project. The proposed mixed-use structure is comprised of one four-story mixed-use building on the northern portion and one five-story residential building on the southern portion, which is connected by an outdoor ground-level breezeway and three external pedestrian bridges on levels 2, 3, and 4. The proposed buildings would be located on top of a two-level subterranean parking garage with 443 parking spaces that encompasses the majority of the 2.33-acre property.

The 253,917 square foot development includes 263 for-rent units (including 41 units designated as affordable housing), 16,481 square feet of commercial use (e.g., office, retail, café), lobby area, a leasing office, business center, fitness center, and pool lounge, as well as bicycle parking and mechanical equipment areas within the parking garage. The Project also includes 27,180 square feet of outdoor community open space (i.e. 4,110 square foot publicly-accessible ‘pocket park’, breezeways, swimming pool courtyard, roof terraces), 600 square feet of indoor community open space, and 11,703 square feet of private open space (i.e. balconies), for a total of 39,483 sf of community open space.

The proposed base residential density allowed according to CD-4 zone standards is 60 dwelling units per acre. As proposed in the PD, the density would increase to 87 dwelling units per acre, which would be consistent with the current Medium Mixed-Use Land Use Designation for the site. Based on the proposed 87 dwelling units per acre density, a total of 203 units would be allowed. With the addition of the 41 affordable housing units, and the associated 30% affordable housing density bonus, the proposed Project proposes a total of 263 units, including 86 studio units, 126 one-bedroom units, and 51 two-bedroom units. Table 1 compares the development standards for the proposed Project with the existing CD-4 (Central District Specific Plan, subdistrict 4, ‘Pasadena Playhouse’) zone and General Plan standards.

Table 1. Project Development Standards

Standard	Proposed Project	CD-4	General Plan
Density ¹	87 du/acre (proposed) 113 du/acre (actual)	60 du/acre (existing)	87 du/acre (existing)
FAR ¹	2.5	2	0 - 2.25
Height ¹	47 feet – 62 feet	35 feet to 50 feet	N/A
Setbacks:			
Green Street	0 feet to 5 feet	0 feet to 5 feet	N/A
Oak Knoll Avenue	0 feet to 10 feet	0 feet to 5 feet	
Hudson Avenue	0 feet to 5 feet	0 feet to 5 feet	
Interior ²	10 feet	None Required	

Note: du/acre = dwelling unit per acre; FAR = floor-to-area ratio.

1. Per Zoning Code Section 17.43.055, On-Menu Density Bonus, a 30% increase in the density, a 0.5 increase in FAR and a 12-foot increase in height is permitted by designating 41 units as affordable housing on-site.
2. Interior refers to the setback from the adjacent lot to the south of the Project site.

The proposed Project would require a zone change from CD-4 to Planned Development No. 37 (PD-37). The Project proposes to use the State Density Bonus legislated by the California Government Code Section 65915 to develop 263 for-rent apartment units (30 percent above the 87 dwelling units per acre proposed in the Planned Development). Because the proposed Project would include 20 percent on-site affordable housing units, the Project would comply with the City’s Inclusionary Housing Ordinance, which would allow the Project to utilize the City’s concession menu to increase the Project’s floor area ratio (FAR) from 2.0 to 2.5 and to increase the building height 12 feet above (allowed so long as the area of the increase is no more than 60 percent of the proposed footprint of the building) the allowed height limit of 35 feet along Green Street in the northern portion and 50 feet along Hudson Avenue and Oak Knoll Avenue in the southern portion for no more than 60 percent of the building footprint. With incorporation of the City’s Affordable Housing Concession Menu, the proposed 4-story building would be built to a maximum height of 47 feet and the proposed 5-story building would be built to a maximum height of 62 feet.

APPROVALS REQUIRED:

The following approvals are needed for the Project, with Design Review occurring only after approval of the Planned Development. The decision-making body for each is noted as well.

Zoning Map Amendment (City Council): The CD-4 zoning designation for the entire site would be changed to Planned Development No. 37 (PD-37).

Planned Development Plan (City Council): The Planned Development Plan prescribes allowed and conditionally allowed uses, applicable development standards, and conditions of approval. It is incorporated into the Zoning Code in Appendix A (Planned Developments).

Public Tree Removal (City Manager): Five of the 15 existing street trees within the adjacent public sidewalks would be removed as part of the Project. As such, it would be necessary to obtain a Public Tree Removal Permit from the Department of Public Works for the removal of the trees located within the right-of-way. The Urban Forestry Advisory Committee advises the City Manager on all requests to removal street trees.

Private Tree Removal (City Council): There are 12 existing trees within the Project site, all of which would be removed to facilitate the Project. Of these trees, one, an Evergreen, or Chinese, Elm with a DBH of 20 inches qualifies for protection.

Design Review (Design Commission): This is required to approve the project design for consistency with the Zoning Code and applicable Design Guidelines. This step must be completed prior to issuance of any building permits for the Project.

DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION:

On behalf of the City, Dudek was hired to conduct the environmental review of the Project in compliance with the California Environmental Quality Act (CEQA). This analysis resulted in a Draft Initial Study / Mitigated Negative Declaration. As required by CEQA, the following environmental topics were analyzed:

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

All impacts studied in the Initial Study were found to be less than significant, or less than significant with implementation of mitigation measures. The Initial Study identified potentially significant effects related to the following topics: Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Recreation, Transportation, and Tribal Cultural Resources. However, with

incorporation of mitigation measures, it was determined in the Initial Study that all potentially significant effects would be reduced to a less-than-significant level.

Summarized below are the topics where it was determined that mitigation measures were necessary, as well as summaries of the relevant mitigation measures. The full analysis of these topics, as well as those found to have a less-than-significant impacts can be found in the Draft Initial Study / Mitigated Negative Declaration (IS/MND).

Cultural Resources (Less than Significant with Mitigation)

The Cultural Resources analysis in the Draft IS/MND found that although the Project would not have a substantial adverse change in the significance of a known historical resource or could disturb human remains, there is the potential to unearth archaeological resources during construction, which would cause a potentially substantial adverse change in the significance of an archaeological resource. Therefore, Mitigation Measure CUL-1 will require the construction contractor and construction personnel attend a Workers Environmental Awareness Program training conducted by a qualified archaeologist. The training will provide guidance on how to identify possible resources and the procedures necessary if resources are found. In addition, Mitigation Measure CUL-2 requires that if cultural resources are found during construction, all ground-disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist, with the allowance for additional analyses and protections.

With the inclusion of Mitigation Measures CUL-1 and CUL-2, potential impacts were found to be less than significant.

Geology and Soils (Less than Significant with Mitigation)

The Geology and Soils analysis in the Draft IS/MND found that although the Project would introduce new structures, residents, and employees into an area located in the seismically active Southern California region and could be subjected to the potential effects related to seismic events, including surface ground rupture, moderate to strong ground-shaking, liquefaction, or landslides, compliance with regulatory requirements would reduce potential impacts to a less than significant level. Similarly, although the Project is unlikely to be located on expansive soils, compliance with regulatory requirements would reduce potential impacts to a less than significant level. Finally, although no paleontological resources were identified within the Project site as a result of the institutional records search or desktop geological review, there still exist the slight chance that such resources could be uncovered and/or destroyed due to digging and grading activities.

Therefore, Mitigation Measure GEO-1 was crafted, which requires that prior to commencement of any grading activity on-site, the Project Applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (SVP) (2010) guidelines to prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the proposed Project. The qualified paleontologist shall attend the preconstruction meeting and a paleontological monitor shall be on-site during all rough grading and other significant ground-disturbing activities beyond a depth of five feet below the existing ground surface or the depth of any artificial fill in previously undisturbed, fine-grained older Quaternary (e.g., Pleistocene age) alluvial fan deposits. If paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor will temporarily halt and/or divert grading activity to allow recovery of paleontological resources.

With the inclusion of Mitigation Measure GEO-1, potential impacts were found to be less than significant.

Hazards and Hazardous Materials (Less than Significant with Mitigation)

The Hazards and Hazardous Materials analysis in the Draft IS/MND found that for four of the seven analyses there would be little or no impact from the Project. The remaining three topic areas have the potential for short-term impacts during construction, but not during operation of the Project. These topics are: 1) the release of hazardous materials into the environment; 2) the emission or handling of hazardous materials within one-quarter mile of a school; and 3) that the site is on a list of hazardous materials sites.

Concerning the release of hazardous materials during construction, including proximity to a nearby school (Futures Academy, 35 N. Lake Avenue), this is partially due to the use of gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, paints, and other materials that potentially contain hazardous substances. In addition, the east portion of the site was formerly utilized as a gasoline service station from sometime prior to 1931 until at least 1952, meaning that there is the potential that one or more underground tanks may exist. However, as the site was redeveloped in 1964 is likely, however not confirmed as yet, that any tanks were removed during demolition and grading of the site. Finally, adjacent properties to the north of the Project site have been historically used for auto repair since 1932. Based on the close proximity (within 100-feet) and long-term utilization of the property for auto repair purposes, the north adjacent property poses a potential vapor encroachment concern.

As part of the Phase I Environmental Site Assessment (ESA) conducted for the Project site, a regulatory agency record review (EDR database search) was conducted for the Project site and surrounding properties. The EDR database search listed the Project site and surrounding properties in various databases indicating the use and storage of hazardous materials and/or petroleum products, and generation of hazardous waste. This is due to the former service stations that were on the site (Penn Oil & Supply Co. and Kirks Texaco Service) during at least 1932 through 1942 and in 1951, respectively. As such, there is a potential for contaminated soils and underground tanks to be present on the Project site due to the presence of the former gasoline service station(s).

To address all three impact areas, Mitigation Measures HAZ-1 and HAZ-2 were crafted. HAZ-1 requires that prior to any demolition or construction activities a Hazardous Materials Contingency Plan (HMCP) shall be developed that addresses potential impacts in soil and the potential presence of underground tanks. The HMCP will designate an environmental monitor who would determine disposal and reporting requirements for contaminated soils, as outlined in the HMCP.

Mitigation Measure HAZ-2 requires that prior to any demolition or construction activities hazardous building materials survey shall be conducted on the two buildings in the southern portion of the Project site scheduled to be demolished to identify asbestos, lead-based paint, and other potentially hazardous building materials (such as mercury thermometers, lighting and electrical appurtenances). Depending on the results of the survey, demolition or renovation plans and contract specifications shall incorporate abatement procedures for the removal of materials containing asbestos and lead.

With the inclusion of Mitigation Measures HAZ-1 and HAZ-2, potential impacts were found to be less than significant.

Recreation (Less than Significant with Mitigation)

The Recreation analysis in the Draft IS/MND found that although the Project would not increase the use of existing, "...neighborhood and regional parks or other recreational facilities..." such that there would be substantial physical deterioration of the facility, the Project does include a new recreational facility (i.e. proposed 4,110 square foot pocket park) which could have an impact on the environment. However, it is not the park itself that could have an impact, it is the construction of the Project itself, which includes the park, which could have an impact on the environment. Therefore, with the inclusion of the relevant mitigation measures discussed previously and subsequent to this discussion, specifically Mitigation Measures BIO-1, CUL-1-3, GEO-1, HAZ-1-2, and TCR-1, the Project would have a less than significant impact on the Recreation topic area.

Transportation (Less than Significant with Mitigation)

The Transportation analysis in the Draft IS/MND found Project would not conflict with a program, ordinance or policy addressing the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel. In addition, the project would not potentially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), nor would it result in inadequate emergency access.

However, the analysis did determine the Project would potentially be in conflict with CEQA Guidelines section 15064.3, subdivision (b), specifically, the VT (vehicle trips) per capita threshold element of the overall analysis that includes impact thresholds for VMT (vehicle miles traveled) per capita, VT (vehicle trips) per capita, and Proximity and Quality of Bicycle Network, Proximity and Quality of Transit Network, and Pedestrian Accessibility.

The City of Pasadena's adopted threshold for VT per capita, expressed as Vehicle Trips in the City of Pasadena per service population (population + jobs), is any increase over existing citywide VT per capita of 2.8 VT. As determined by the City's travel demand forecasting model (TDF), the VT per capita would be 3.8, as calculated by dividing the Project's VT (1,187) by the service population (310). Because this result exceeds 2.8, Mitigation Measure TRA-1 was crafted to require the Project Applicant/Developer develop and implement a Transportation Demand Management Plan that includes strategies to reduce the Project's vehicle trips by a minimum of 27%. Some of the measures to achieve this result shall include, but not necessarily be limited to, the following:

- Unbundled parking for the residential use;
- The Project Applicant/Developer shall purchase 121 Metro passes and offer them to interested residents at a 50 percent discount for five consecutive years from the issuance of Certificate of Occupancy.
- The Project Applicant/Developer shall provide an Annual TDM Survey beginning one year after the issuance of Certificate of Occupancy to demonstrate the minimum 27% reduction of Project vehicular trips per capita is maintained.

Therefore, with the inclusion of Mitigation Measure TRA-1, potential impacts were found to be less than significant.

Tribal Cultural Resources (Less than Significant)

The Tribal Cultural Resources analysis in the Draft IS/MND found that although the Project would not have a substantial adverse change in the significance of a known tribal cultural resource, there is some potential for unknown subsurface tribal cultural resources to be impacted by the project. If previously unknown tribal cultural resources are uncovered during construction, and are not identified and avoided or properly treated, a potentially significant impact could result. Therefore, in addition to the previously described Mitigation Measure CR-1 (WEAP training), Mitigation Measures TCR-1 through TCR-8, summarized below, been imposed to protect tribal cultural resources, in the event that any are discovered during Project construction.

- TCR-1: The Project Applicant shall be required to retain and compensate for the services of a tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government. The monitor/consultant will only be present on site during the construction phases that involve ground-disturbing activities.
- TCR-2: If any archaeological resources are discovered, construction activities shall cease in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians – Kizh Nation.
- TCR-3: If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis.
- TCR-4: Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and PRC 5097.98 shall be followed.
- TCR-5: Upon discovery of human remains, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the tribe, the qualified lead archaeologist, and the construction manager who will call the coroner.
- TCR-6: If the Gabrieleño Band of Mission Indians – Kizh Nation is designated as the Most Likely Descendant, the following treatment measures shall be implemented. To the tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, tribal traditions included, but were not limited to, the burial of funerary objects with the deceased and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact.
- TCR-7: Prior to the continuation of ground-disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment

placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours.

TCR-8: Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of the Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

With the inclusion of Mitigation Measures TCR-1 through TCR-8, potential impacts were found to be less than significant.

Respectfully Submitted,



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Attachments (2):

Attachment A: Project Plans

Attachment B: Draft Initial Study / Mitigated Negative Declaration

ATTACHMENT A

PROJECT PLANS CAN BE DOWNLOADED AT:

WWW.CITYOFPASADENA.NET/PLANNING/PLANNED-DEVELOPMENT-37/

ATTACHMENT B

**DRAFT INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
CAN BE DOWNLOADED AT:**

WWW.CITYOFPASADENA.NET/PLANNING/PLANNED-DEVELOPMENT-37/