

**Correspondence given to the
Planning Commission on
Wednesday, February 29, 2012
and March 14, 2012**

- **Letter from Marsha V Rood**
- **Letter from Richard Norton**
- **Letter from Ann F. Scheid**
- **Letter from Nina Chomsky**

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February 28, 2012

Carolyn Naber, Chair
Members of the Planning Commission
City of Pasadena
175 North Garfield Avenue
Pasadena, CA 91109

c/o Mr. Denver Miller, Principal Planner

RE: All Saints Church Master Development Plan

Dear Chair and Planning Commissioners:

THE CHOICE BEFORE YOU TONIGHT IS VERY CLEAR:

Essentially, you have the choice to ***EITHER:***

#1. APPROVE AN ALL SAINTS CHURCH MASTER DEVELOPMENT PLAN THAT CONFORMS TO THE PROJECT. The *All Saints Church Master Development Plan* before you tonight would allow and call for the introduction of a set of buildings that are incompatible with The Bennett Plan and the long-existing land use and building pattern on Euclid Avenue. In order to conform to the long-standing Bennett Plan, the goal to be achieved in the Master Development Plan would be to call for a series of building forms that face Euclid Avenue on their narrower face, with some spacing between in the form of lawns or courtyards that are similar in character to those currently evident on the street. The proposed building forms as shown in the proposed *Master Development Plan*, however, *do not exist in the Civic Center* nor do their relationships to the existing Euclid Avenue pattern of green space and buildings perpendicular to the street edge. The long

façade of one of the proposed building facing Euclid Avenue lies *parallel rather than perpendicular* to Euclid Avenue without a courtyard. To approve such a *Master Development Plan* would be to repeat the mistakes of the 1960s and 1970s which saw the introduction of the *Los Angeles County Courthouse*, the *Mutual Savings Building*, and the *Plaza Pasadena*, a redevelopment project with a major public investment. As we know, the *Plaza Pasadena* project was significantly modified ten years ago with substantial public monies to create a set of buildings that better conform to the Bennett Plan's historic street pattern and relationship of existing buildings to the street.

OR CHOOSE TO:

2. APPROVE AN ALL SAINTS CHURCH MASTER DEVELOPMENT PLAN THAT ESTABLISHES THE STANDARDS FOR A PROJECT. The preferred approach would be to approve a *Master Development Plan* for the All Saints Church property that would allow the addition of a set of buildings to the *Civic Center National Register Historic District* that reflect and reinforce the voter-approved Bennett Plan, the recipient of the 2012 National American Planning Association Planning Landmark Award and a legacy to the City Beautiful movement, which gave birth to the of city planning movement. This *Master Development Plan* would require that all new construction on North Euclid Avenue have integral, well-designed courtyards with the narrower frontages of the buildings facing onto the street. This choice would be a logical evolution of the Civic Center and reflective of the nearly **\$400 million** in public investment to retain and enhance the Bennett Plan. (*Please see attached Exhibit "A" for illustrated layout that conforms to this recommendation.*)

What guidance does your approved plan for the Civic Center give you?

The Central District Specific Plan as adopted in 2004 contains a series of general policies and design guidelines including: ***"The design of all buildings and public spaces in this precinct should reflect the highest quality, respect the permanence of civic landmark buildings, and reinforce the vision of the Bennett Plan."*** (p. 104). The Specific Plan, however, does not include a block-by-block analysis, specifications and visual illustrations of the design standards and land uses which should be implemented. In fact, the Specific Plan, as adopted, legally "superseded" all previous plans that did. The community, however, has spoken consistently on the subject three times: (1) once in the voter –approved *Bennett Plan* in 1925; (2) again in the Council-approved *Civic Center Master Plan* in 1989

and then again (3) in the *Civic Center/Mid-town Area Programming Effort Report* approved by City Council in 1998 (commonly known as the “Grey Report”). Basically, those plans and programs said that additions to Euclid Avenue should respect and enhance the existing and planned site plan pattern of green space, perpendicular building; green space, perpendicular building; green space, perpendicular building, and so on. (*Please see the Attachment for a more detailed analysis*).

So upon what basis do you have to interpret the *words* in the *Central District Specific Plan* to allow a set of buildings whose longest length is parallel to the street with no alternating pattern of green space? Based upon the evidence, none whatsoever. Once this *Master Development Plan* is approved, it would be exceedingly difficult to “take it back”. Any master development plan approved for the Civic Center now and in the future must be *an expression of deeply held community values with respect to the Civic Center.*

As a final note, my comments should not be seen as “anti-Church expansion plans”. Rather, my comments should be seen as pro-Civic Center and pro-City of Pasadena. After all, it is the heart of the city.

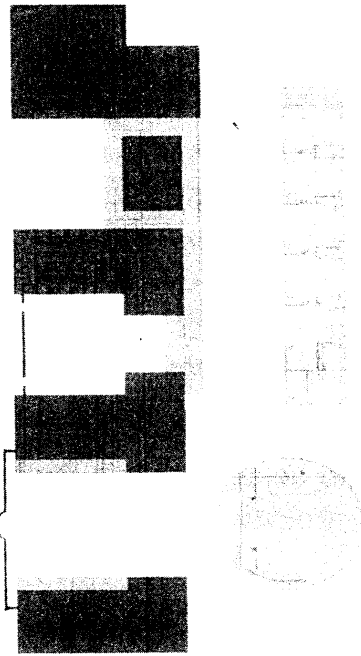
Respectfully submitted,

[Marsha V. Rood]
MARSHA V. ROOD, FAICP

ATTACHMENTS: Exhibit “A” Illustration

Rationale for Recommendation

EXHIBIT "A"



ATTACHMENT: RATIONALE FOR RECOMMENDATIONS

Given the weight of the evidence of Pasadena – the distinguished history of architecture and planning in Pasadena, the long-standing community-based plans and the continuing value that the community places on historically important buildings - the proposed *All Saints Church Master Development Plan* must:

- A. Prioritize compatibility of the All Saints Church proposed expansion project with the existing national historically significant buildings and environment over differentiating old buildings from the new building.** The bias in the All Saints Church Master Development Plan Final Environmental Impact Report ("*Final EIR*") is to interpret the Secretary of the Interior's Standards for Rehabilitation of Historic Structures ("Secretary of the Interior's Standards") in terms "differentiation" rather than "compatibility", clearly favoring a project that is much more contemporary or "of its time" rather than one that is a contextual or "of its place". Although modernist style buildings quite easily solve the problem of "differentiation" from a standards perspective, it does not solve it from a "compatibility" standards perspective.
- B. Evaluate the Project against the long-standing plans since the 1920s and recent community General Plan update outreach efforts point to evaluating the new project in terms of how compatible it is with the existing and historically significant and community-valued setting.** The impacts that must be evaluated in the *Final EIR*, among other impacts, are:
1. How do the new buildings, arrangement of buildings, architectural form, and associated open space most respect and harmonize with the existing architectural and historic environment of the All Saints Church and Pasadena's historically significant City Hall?
 2. How do the massing and building volumes best fit with the existing pattern of "solids and voids" along Euclid Avenue?

3. How does the proposed *Master Development Plan* respect the architectural design of the existing historic landmarks – the existing All Saints complex and City Hall – including the use the palette of material and colors currently found in the area?
4. Does the *Master Development Plan* disrupt the visual context and historic set of All Saints complex and City Hall by calling attention to the new work, rather than blending with the old? Would the new buildings *stand out and overwhelm* rather than *fit in and enhance* their surroundings? Would they minimize the church's historic importance as a campus within and to the Civic Center?

The City should develop a broader and more robust range of reasonable Alternatives than those contained in the *Final EIR*. The Alternatives developed should feasibly attain most of the basic objectives of the project, comply with the *Secretary of the Interior's Standards* and avoid the significant effects of the Project.

In the historic resources section, the *Final EIR* states that the Project is located within the boundaries of the national register *Pasadena Civic Center District*. It also states that the All Saints Episcopal Church complex (Church, Parish Hall and the Rectory) and the Maryland Hotel wall should be regarded as historic resources for the purposes of the California Environmental Quality Act ("CEQA"). This means that the *Secretary of the Interior's Standards for Rehabilitation of Historic Structures* must be applied when looking at the proposed new buildings. Standard "9" states the following:

9. "New additions, exterior alterations or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

This standard is reflected in the requirements of the *Central District Specific Plan* (2004), "***The design of all buildings and public spaces in this precinct should reflect the highest quality, respect the permanence of civic***

landmark buildings, and reinforce the vision of the Bennett Plan.” (p. 104)
The Specific Plan further states that the “...**setting for these buildings is no less important, and therefore, realization of the 1920s ‘City Beautiful’ Vision should be advocated through 1) preservation of historically significant buildings; 2) requirements for new buildings that are complementary to existing landmarks; and 3) reintegration of the Beaux-Arts axial plan”.** (p.102)

The Specific Plan’s Sub-District Design Guidelines for the Civic Center/Mid-Town area further call for the new development to:

“Respect the architectural design of historic buildings and protect the monumentality of landmark civic buildings; limit the scale and massing of larger building by employing articulated sub-volumes.”
(p. 172) It also calls for using “... **the palette of materials and colors currently found in the area; masonry (non-brick), stucco, colored concrete and tile decorative elements are prominent materials, and the use of intense colors should be severely limited.**” (p. 172)

Therefore, on this basis of the Secretary of the Interior Standards and the Specific Plan, a new developments: (a) shall not destroy historic materials; (b) must be differentiated from the old, and (c) must be compatible to protect the historic integrity of both **the Property** and its **Environment**. On the basis of the Specific Plan, new developments should respect the prominence of civic landmark buildings and the preservation of historically significant buildings, be complementary to existing landmarks, respect the architectural design of historic buildings, and use the palette of material and colors currently found in the area.

The questions for the environmental impact analysis are: (1) How should these standards and guidelines be interpreted and applied in the *Final EIR*? (2) Is “differentiation” or “compatibility” the dominant emphasis when considering the existing historic buildings not only on the property, but also with historic Civic Center buildings across the street? (3) What the weight of the evidence in Pasadena

- is keeping record of the time the new architecture is added more important than maintaining and enhancing the place in which it is built?

A. The Property: The **All Saint Episcopal Church complex of buildings** are the products of renowned architects – Johnson, Kaufmann, and Coates - who designed the *English Gothic Revival* sanctuary; and Bennett and Haskell who designed the Parish and Rectory addition in the same style. Additions designed by Whiney Smith and Wayne Williams were made in the 1960s in a more “modernist” interpretation of the *English Gothic Revival* style, thus creating an identifiable campus of church buildings and context for future additions. According to the *Final EIR*, the Maryland Hotel Wall, a section of the wall that enclosed a portion of former resort hotel grounds, is also a contributing element to the designated historic district.

B. The Environment: The importance of the Civic Center to the city is indisputable. The “City Beautiful” *Bennett Plan* established its foundations in the 1920s with creation not only of the City Hall, Central Library and Civic Auditorium but also the relationships among them. The firm that did the plan – Bennett, Parsons & Frost – was the successor firm to *Burnham & Bennett*, who did the *Plan for Chicago* and founded the city planning movement in America. After several incompatible modernist buildings were added to the Civic Center in the 1960s and 1970s, the City rededicated itself to the full realization of the Civic Center “City Beautiful” plan in the late 1980s *Civic Center Master Plan (the “Master Plan”)* and the late 1990s *Civic Center/Mid-Town Programming Effort Report (commonly referred to as the “Grey Report”)*.

The City did more than adopt plans in the 1980s and 1990s. *These plans became living documents*, resulting in a massive infusion of public and private investments in the Civic Center/Mid-town area over the past three decades. The City alone spent **nearly \$400 million dollars** from the 1980s through the 2000s on seismic upgrades and restoration of City Hall, construction of the new Police Building, upgrades and re-landscaping of the

Central Library, development of Plaza las Fuentes and the Holly Street Village Apartments, rehabilitation of the Hale Building, expansion of the Convention and upgrades to the Pasadena Civic Auditorium upgrades, and redevelopment of the Plaza Pasadena into the Paseo Colorado.

C. Community Values: Has the community's view of preserving historically significant architecture changed since these plans were approved? This is not the case. The General Plan Update Outreach Summary Report dated May 2010, speaks to how much the community values the design and architecture of the city. Participants highlighted the importance of historic architecture, describing the city's buildings as "unique" and "iconic" with "quality" and "richness". However, participants expressed much dissatisfaction when discussing developments that are more recent. Many worried that Pasadena's "sense of place" was slowly being eroded with the addition of the many new building in this decade. Although some unilaterally supported a broad range of architectural styles, many believed that context and historic setting should be the driving factor in determining appropriate architectural style. They felt like new development should look like Pasadena, not the other way around.

The proposed *Master Development Plan* should require that the new expansion project buildings fit in a harmonious way with the existing historically significant landmark setting and with the existing North Euclid Avenue street pattern that is characterized by interplay of green spaces and buildings. The Civic Center's foundational documents offer some *guidance* in developing Alternatives - the City Council-approved *Pasadena Civic Center Master Plan* (1990) ("Master Plan") [Lyndon/Buchanan Associates, consulting planners/architects] as reinforced by the City Council-approved *Civic Center/Mid-Town Programming Effort Report* (1998) (commonly known as the "Grey Report") [Moule and Polyzoides Architects and Urbanists, consultants]. Unlike the Specific Plan that addressed the Civic Center/Mid-Town area as a whole rather than on a block-by-block basis, both the Master Plan and the Grey Report focused on the Civic Center/Mid-Town area in

detail and on a block-by-block basis, including North Euclid Avenue. Although the Specific Plan states that these plans have been superseded, these prior City Council-approved planning documents are instructive and can be used to more accurately interpret and apply the Guideline statements contained in the Specific Plan. Importantly, they can be used to develop more robust Project Alternatives that more accurately reflect the intent of the Specific Plan

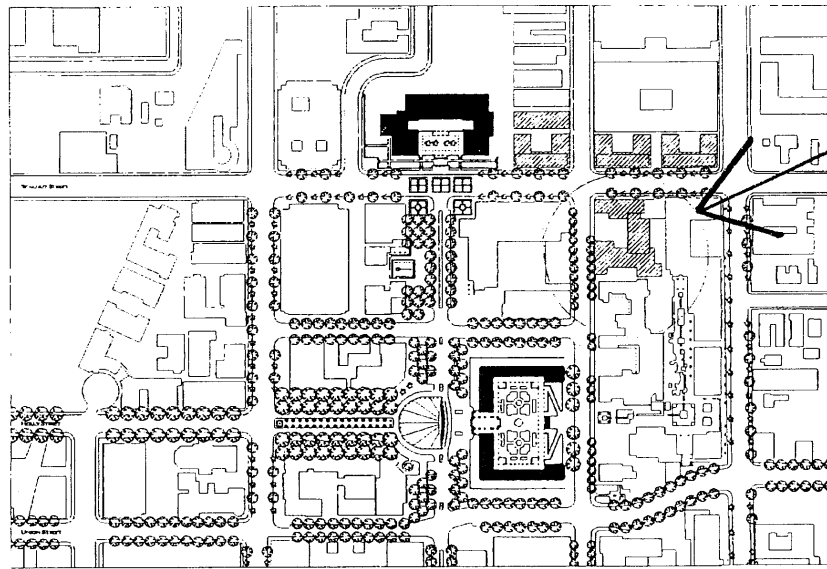
With respect to the site under consideration, the Master Plan required *courtyards* along North Euclid Avenue in order to reinforce the combination of "all of the elements of the Civic Center" and the existing green space/building footprint pattern along North Euclid Avenue as follows:

- **"EUCLID AVENUE:** With City Hall, the Maryland Apartments, All Saints Church and rectory, and the mix of housing and offices on Euclid, it is a street which combines all of the elements of the Civic Center (government, religious institutions, housing and commercial) in an attractive way though somewhat sporadic way. It is particularly important that this street, with its diverse registered monuments, serve to mediate between the rest of the Civic Center and the large scale development of Plaza las Fuentes." (excerpt) "Formally, Euclid Avenue can be characterized by an interplay of building and green space for which the City Hall courtyards, the lawns of All Saints Church, and the copse of trees intended for the Euclid Avenue frontage of Plaza las Fuentes provide models" (excerpt). (p. 83)
- **"Building Form Along Euclid:** The object is to achieve a series of building forms that come to the street, with some spacing between them in the form of lawns or courtyards, that are evident on the street." (p. 95)

The Grey Report reinforced this street pattern as follows:

"g. Walnut/Euclid Street Parcels

"(2) Design and Land Use Standards: All new construction facing Euclid Avenue shall have integral, well-designed courtyards facing onto the street. This continues the existing courtyard pattern already existing at Euclid Avenue." (p. 53)



W A L N U T / E U C L I D



Notwithstanding the lack of carry forward of these key Civic Center documents, the *All Saints Church's Master Development Plan* must reflect the purposes, intent and provisions of the *Specific Plan* and the *Pasadena General Plan* because they are an expression of deeply held community values with respect to the Civic Center. Also, the proposed *Master Development Plan* must be compared against and meet the more detailed guidelines and standards contained in the *Specific Plan*, including "respecting the street-oriented development patterns of existing building", and the "incorporation of courtyards and other urban outdoor spaces, height limits, respect for the scale and massing of existing historic structures, reinforcing historic development patterns, reinforcing the architectural context, using the palette of materials and colors currently found in the District."

RICHARD NORTON
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(626) 396-1121

February 28, 2012

To: Planning Commission, City of Pasadena

Re: All-Saints Church EIR

Dear Chair Naber and Planning Commissioners:

The impressively hefty set of documents before this commission is actually a “Tin Man” EIR. The heart is missing. The EIR omits the All-Saints Master Development Plan’s most obvious potential adverse impact--whether inserting strikingly contemporary buildings into the Civic Center Historic District will cause a potential significant adverse impact on the aesthetic or cultural resources of that District.

Despite the repeated requests by this commission, by other civic groups and by the community, the EIR preparers disingenuously chose to ignore the heart of the matter. The law does not permit such an omission. The old refrain, that the Design Commission will take care of any “design” problems later, has no merit. Kicking a potential significant adverse impact down the road won’t work.

The Civic Center and the City Beautiful Movement

The discipline we now know as City Planning grew up with the City Beautiful Movement of the 1920’s. That movement advanced the principle that a city should be planned to be both beautiful and efficient.

Pasadena chose to be a leader in the City Beautiful Movement. In 1925 the City hired Edward H. Bennett, then the leading city planner in the entire nation, to produce a grand civic center featuring formal buildings in the Beaux-Arts style.

Under the Bennett Plan, the Pasadena Civic Center came to include an ensemble of ten important buildings conceived and realized in a single decade from 1923 to 1932 and crowned by the City Hall, as well as surrounding properties without buildings which helped create a sense of place.

The Bennett Plan has remained a viable planning vision. In 1988 the City made the Bennett Plan the foundation of its new Civic Center Master Plan. Since then the City has spent nearly \$400 million (\$400,000,000) for additions, retrofitting and reusing those original buildings such as the Civic Auditorium, the City Hall, the Central Library, the YMCA , the YWCA, the Gas Company building and others. Pasadena is justifiably proud of its civic center.

Notably, just this year Pasadena's 1925 Bennett Plan won the APA National Planning Landmark Award.

The National Register Designation

In 1978 the Pasadena Civic Center was nominated as a National Register Historic District. The original 1978 nomination did not include this property. In 1979 the nomination was specifically amended to include this property (and no other additions) and a new map of the proposed Historic District was submitted. In 1980 the U.S. granted the Pasadena Civic Center the status of a National Register Historic District, which district then and now includes this property.

Reaction to the Richard Meier Contemporary Design

All-Saints Church was apparently unaware of the National Historic District when it hired Richard Meier & Associates to produce a master development plan for the expansion of Church activities onto this property. When the Meier group's plan was finished, the Church and its architects showed the City detailed building elevations, materials lists and an equally detailed scale-model of the architect's vision and simultaneously displayed those plans and model to interested civic groups. At its core, the All-Saints Master Development Plan proposes distinctly contemporary design using architectural styles and building forms utterly foreign to the Pasadena Civic Center Historic District.

In 2008 when the All-Saints Master Plan came before this Commission there was substantial controversy about the impact of startlingly contemporary architecture, facing City Hall and within the National Historic District. The Planning Commission decided the project required an EIR to be prepared. Later both the Draft and Revised Draft EIR's came before this commission. At hearings on those documents and in written comments, the issues of aesthetic and cultural resource impacts on the Civic Center Historic District were raised repeatedly.

To be clear, no one opposed any of the uses All-Saints Church proposed on this property. Likewise, there has never been a substantial issue with proposed density, FAR, traffic, pollution, etc. The potential significant impact crying out to be studied is whether the style and form of the architecture belongs in this place.

Perhaps contemporary architecture on this site will enhance the historic character of this district. But, there absolutely is the potential that it will significantly adversely affect the sense of place which is the key to an historic district. The EIR is only sufficient when it has analyzed all potential impacts for the decision-makers to find impacts that are significant and adverse and, if feasible, to suggest mitigations.

The “Tin Man” EIR

No elevations. No photos of the scale model. No mention of the architecture or style of the proposed buildings. Why?

The EIR documents give us the background for this issue. At pages 4.3-1 to 4.3-10, the EIR tells us about the Civic Center National Register Historic District: calling it a “nationally significant example of civic art in the City Beautiful style of the 1920’s.”

At page 4.3-1 the EIR says:

“CEQA requires evaluation of project impacts on historic resources, including properties listed in or determined eligible for listing in the California Register of Historic Resources. . . .”

The EIR says specifically that this property is part of a National Register Historic District and thus automatically listed in the California Register of Historic Resources.

So, the EIR says CEQA requires the analysis, but none is offered. The telltale excuse is found at pages 4.3-13 and 14:

“. . . further design review as required by the Zoning Code is intended to ensure that the project design as it progresses forward does not cause additional significant effects. . . .”

Wrong. All potential significant adverse impacts need to be studied in the EIR, not kicked down the road, no matter what the Zoning Code says about further design review. To fail to do so is to violate CEQA.

What Is Required?

We need not look far to find what the EIR preparer needs to do.

Item: In 2011, the City published its “Justification” for the City Center Midtown street project. That is an ongoing effort to improve existing streets right in the Civic Center Historic District. The Justification is:

“The project will further enhance and preserve the historic 1920’s Beaux-Arts Civic Center district design elements.”

This EIR needs to address whether the All-Saints Master Development Plan will enhance and preserve the historic 1920’s Beaux-Arts Civic Center district design elements, or whether its impacts will be adverse.

Item: The EIR itself contains a detailed blueprint of what needs to be done. The City labels Appendix B to the Final EIR: “Sense of Place Guidelines.” (In fact Appendix B is a scholarly piece by a nationally-known preservation architect entitled “Sense of Place: Design Guidelines for New Construction in Historic Districts.”)

So, Appendix B contains guidelines for how to evaluate new construction, but the EIR impacts analysis utterly ignores the topic. Nowhere is “sense of place” considered or even mentioned. Nowhere are the impacts on the historic character of the Civic Center district analyzed.

Maybe it’s a head-in-the-sand approach, or the “Emperor’s new EIR,” or the unacknowledged elephant in the living room, or the Tin Man EIR, or whatever, but the potential impacts of these contemporary buildings in a National Register Historic District need be addressed.

The EIR preparer needs to stop pretending that the Richard Meier Master Development Plan has no design, no architecture, and no impact.

Sincerely,

Richard Norton

Ann F. Scheid

RECEIVED 3-14-12
PLANNING COMMISSION
CITY OF PASADENA

13 March 2012

Dear Members of the Pasadena Planning Commission:

Re: Report from ICF International

The report includes numerous factual errors (pp 1-2). The Maryland Hotel (1914) was designed by Myron Hunt, not Wallace Neff. The Maryland Hotel Wall was designed by Wallace Neff as part of design of 24 room "garden villa" for Eudora Spalding in 1926. The Wall is a structure, not an object. The Maryland Hotel Apartments building was designed by architect Edward B Rust, not John Parkinson.² The Maryland Hotel Apartments is a contributor, not a contributing element, to the NR Historic District.

On pp 6-8 the report considers the project's impacts on the Civic Center Historic District. The report is in error when it states: "The proposed construction is within the Civic Center Historic District, but is just outside the Bennett Plan eastern perimeter." In fact, the Bennett Plan extends east to Los Robles, so the proposed project is well within the Bennett Plan which is now bounded by the Plaza Las Fuentes complex on the east. It seems that the author has never seen the Bennett Plan (See attachment).

The Plaza Las Fuentes project was specifically designed to retain an open axis to the east from City Hall to Los Robles Avenue, to concentrate the massing of the project toward the northeast and to maintain compatibility in a design that follows the hierarchical composition of traditional architecture and uses color, materials, and fenestration compatible with the Civic Center.

That the proposed buildings are differentiated from the district is clear (pp. 7-8). The question is how are they compatible? The author equates "will not overwhelm" with compatibility, but does not demonstrate how this is true.

The massing, proportion, and scale of the proposed buildings, their "simplistic bulk" as described by Donlyn Lyndon in the Civic Center Master Plan of 1988, are not discussed in relation to the rest of the Civic Center buildings, both along Euclid Avenue and elsewhere in the Civic Center. The proposed buildings are reduced to simple abstract shapes; the author does not demonstrate how these are compatible with the composite quality of the Civic Center buildings.

There is no discussion of the streetscape of Euclid Avenue with its succession of solids and voids, buildings enclosing courtyards, and its pattern of buildings perpendicular to

¹ *California Life* (July 1, 1926) p 11.

² Pasadena Civic Center National Register Nomination, Addendum.

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the street, so analysis of the site plan as a whole and its compatibility with the setting are not considered in the report.

Failing to identify any significant issues with the proposed buildings, the report leaves the compatibility issue to be solved by the Design Commission (p 8). Here the report adds still another factual error: that the front elevation and the walls of Building A will be in cast stone. Does the author mean veneered with natural stone? Or cast concrete? Who knows?

The report continues that the exposed architectural concrete of Building B “may be treated in such a manner as to reference the relative smoothness of many of the Civic Center buildings.” How does this demonstrate compatibility? The report notes that both City Hall dome and Building B are circular in shape. The abstract reference may be recognized by architects and informed observers, but it is unlikely that the general public will find this building compatible with the historic context.

Given the numerous factual errors, including those cited above, the demonstrated unfamiliarity with the Bennett Plan, the Pasadena Civic Center National Register Nomination, and other key documents, as well as the failure to use the Secretary’s *Guidelines* in the evaluation, the report seems simplistic in its analysis at best, and at worst, unreliable.

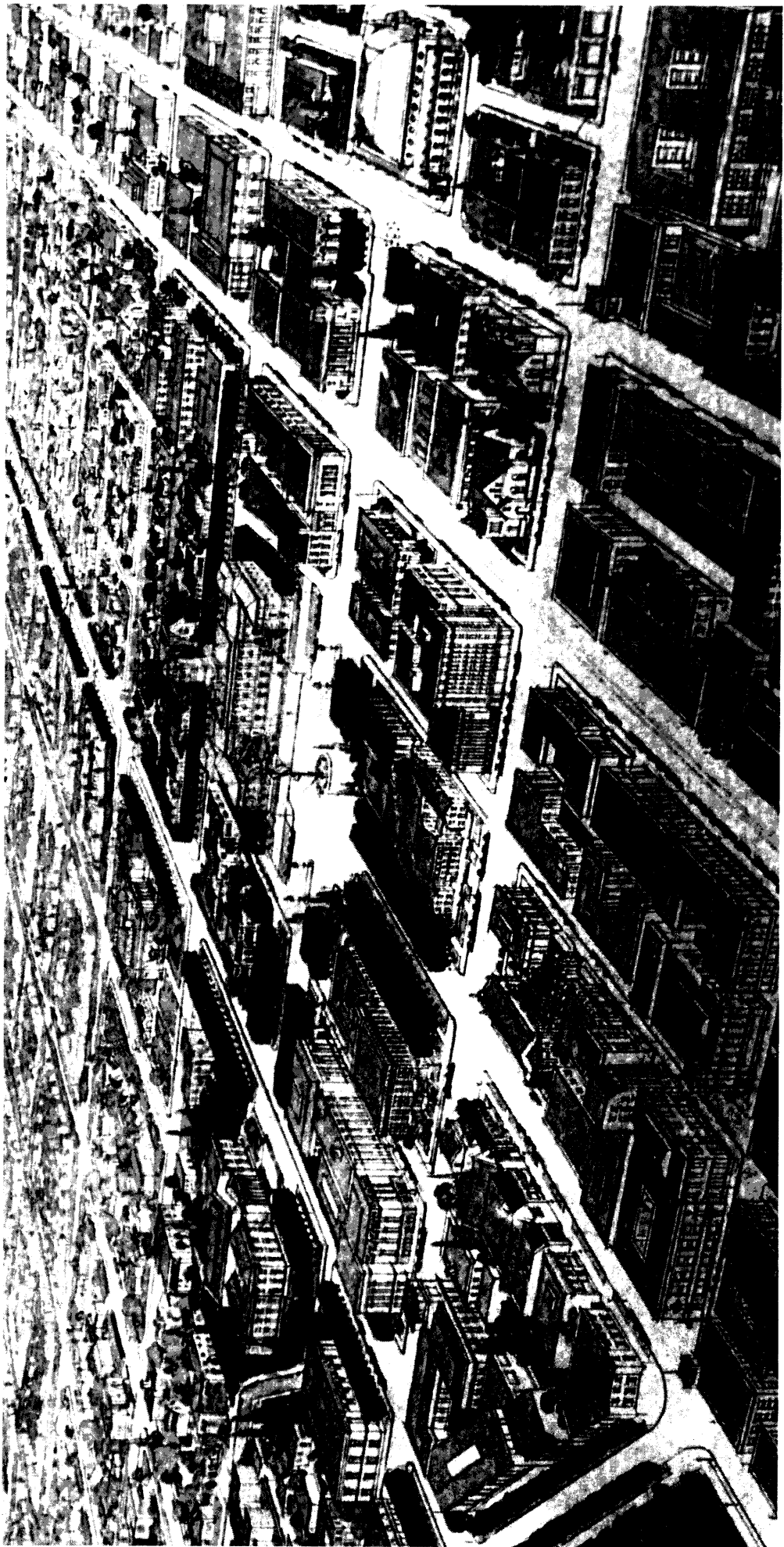
Sincerely,

Ann Scheid

Attachments:

Bennett Plan, 1923

Bennett Aerial Perspective 1923 showing All Saints Church behind City Hall and courtyard building north of the church



RECEIVED 3-14-12
PLANNING COMMISSION
CITY OF PASADENA

NINA CHOMSKY
1500 Lancashire St.
Pasadena, CA 91103
March 13, 2012

Planning Commission
City of Pasadena

Re: Meeting: March 14, 2012
Agenda Item 4 a. Public Hearing: All Saints Church Master Plan and Final EIR

Planning Commissioners:

Thank you for this opportunity to comment for the Administrative Record.

First, I commend the response of the Applicant and the staff to the Maryland Wall matter, but that does not end the problems with this Master Plan and Final EIR. Fatal problems remain with Site Plan as to Building A, the West Building, which justify your recommending rejection of this iteration of the Master Plan and rejection of Certification of the Final EIR.

This Project is proposed for the Pasadena Civic Center District listed on the National Register, and, immediately adjacent to the City Hall – as such, it must receive the highest level of scrutiny and review. And, what is the essence of the Master Plan deserving of this highest level of review? The Site Plan, as studied in the EIR, including, but not limited to, the EIR Alternatives, Aesthetics and Land Use analyses.

In this context, I commend the Recommendations of the Design Commission to you. The Design Commission was granted an incredibly broad grant of jurisdiction in connection with their Advisory review. Specifically, the Design Commission acted as the Historic Preservation Commission as well as the Design Commission; empowered to advise on aesthetic and urban design issues related to the recommended site plan and related aesthetic issues, as well as historic preservation.

As to the staff recommended revised Site Plan (Alternative 7), you are being “painted into a corner” once again. You are being asked to recommend to the City Council that new Alternative 7 and all other proposed Alternatives are just fine. But, once you make this determination, you and the Design Commission are “locked in” to the approved Site Plan (except for minor changes which might be approved by the Planning Director) when this Project comes back for further discretionary review, such as Design Review. Upon Site Plan approval and CEQA clearance, we all are back, once again, to fixing the “details”, or “decorating the box”: i.e., the colors, the materials, the windows and looking at the door hardware – all important, but the crucial Site Plan essentially is “fixed.”

Thus, as to the Site Plan, and particularly as to the West Building, it is essential that you, the Planning Commission, know that you can make all the required Master Plan

Findings (particularly Findings 2, 3, 5 and 6, and, that you determine that you have been provided full and Adequate Alternatives in the EIR so that you have sufficient information to select an Alternative that is in full compliance with all applicable Pasadena rules and the Secretary of the Interior's Standards.

In fact, so far, none of the current Alternatives included in the Final EIR, including Alternative 4, which appears to be a "straw-man" attempt which purposely includes irrelevant square footage (please see and take note of the specific language of staff recommendation No. 1 referring to "all" 7 Alternatives) fully comply with all applicable rules – which include the Secretary of the Interior's Standards (which emphasizes compatibility of new construction) and the Central District Specific Plan, as informed and interpreted and applied consistent with the legislative record, including, but not limited to, the Bennett Plan and the Grey Report – all discussed by Marsha Rood and others. In connection with the Secretary of the Interior's Standards, please see the materials submitted by Ann Scheid in response to the ICF International flawed report.

So, what is wrong with Alternative 7 and 1 -6? The proposed new West Building, Building A, under Alternative 7 and the other Alternatives, does not conform in terms of orientation on the site and in terms of the rhythm of "solids and voids" along Euclid, and, in terms of the orientation of public, semi-public and private open spaces to Euclid. There is substantial evidence on the record to support the failure of Alternative 7 to comply, and the requirement that the Site Plan and the West Building, must comply with these required urban design imperatives.

As a result of the failure of Alternative 7, the Final EIR is inadequate in terms of the Alternatives analyses; the Historic Resources and Land Use sections which fail to adequately analyze, interpret and apply all applicable rules and guidelines, and the Aesthetics section.

In connection with Aesthetics, note the CEQA Guidelines and Pasadena Check List applicable language, i.e. does the proposed Project:

Substantially degrade the existing visual character or quality of the site and its surroundings;

In fact, Alternative 7 does degrade existing visual character and the quality of the site and its surroundings primarily because of the failure of building orientation, the failure of the Site Plan as to the "solids and voids" rhythm on Euclid, and, the failure to follow all applicable regulatory standards.

Thus, it is clear to me (and others) that one or more additional Alternatives must be studied in the EIR. Attached and submitted for your consideration is the applicable Page plan from the Grey Report, and, you have the suggested new Alternative 8 plan embraced by the Design Commission, both of which conceptually site and orient the square footage and open spaces in a manner which is compliant, and, both of which meet the project's objectives and are feasible.

New Alternative 9: several of us the other day distilled the problem down to the most basic changes that could be made to the Site Plan and West Building to bring the Site Plan into compliance and meet project objectives. Here are the three basic points:

- Move the West Building completely out from behind the Maryland Wall;
- Remove and relocate the outside staircase; and
- Limit the length of the West Building on Euclid to no more than the length of the Church portion of the existing Euclid church frontage – about 80 feet.

I urge you to recommend sending the Final EIR back for further study of new Alternatives 8 and 9.

I understand that some ask why new Alternatives at this late date. The answer is that all of us waited months and months for new Alternative 7, and the Design Commission and tonight are the first public Hearing opportunities to reject Alternative 7 and offer other new ideas. Alternatives 8 and 9, and, of course, the Grey Report Site Plan, are all environmentally superior in that they are compliant solutions to the Euclid frontage challenge.

Without additional information regarding the West Building, you must find that the Final EIR is not Adequate (including, but not limited to, the Alternatives, Historic Resources, Aesthetics and Land Use sections). Further, it is clear that you cannot recommend that the City Council make Findings 2, 3, 5 and 6 for approval of the proposed Master Plan which are set forth on Pages 1 through 5 of the proposed Findings (including, but not limited to, proposed Master Plan Findings as to historical integrity and character, compatibility, design character and scale, visual character, and, regulatory consistency.)

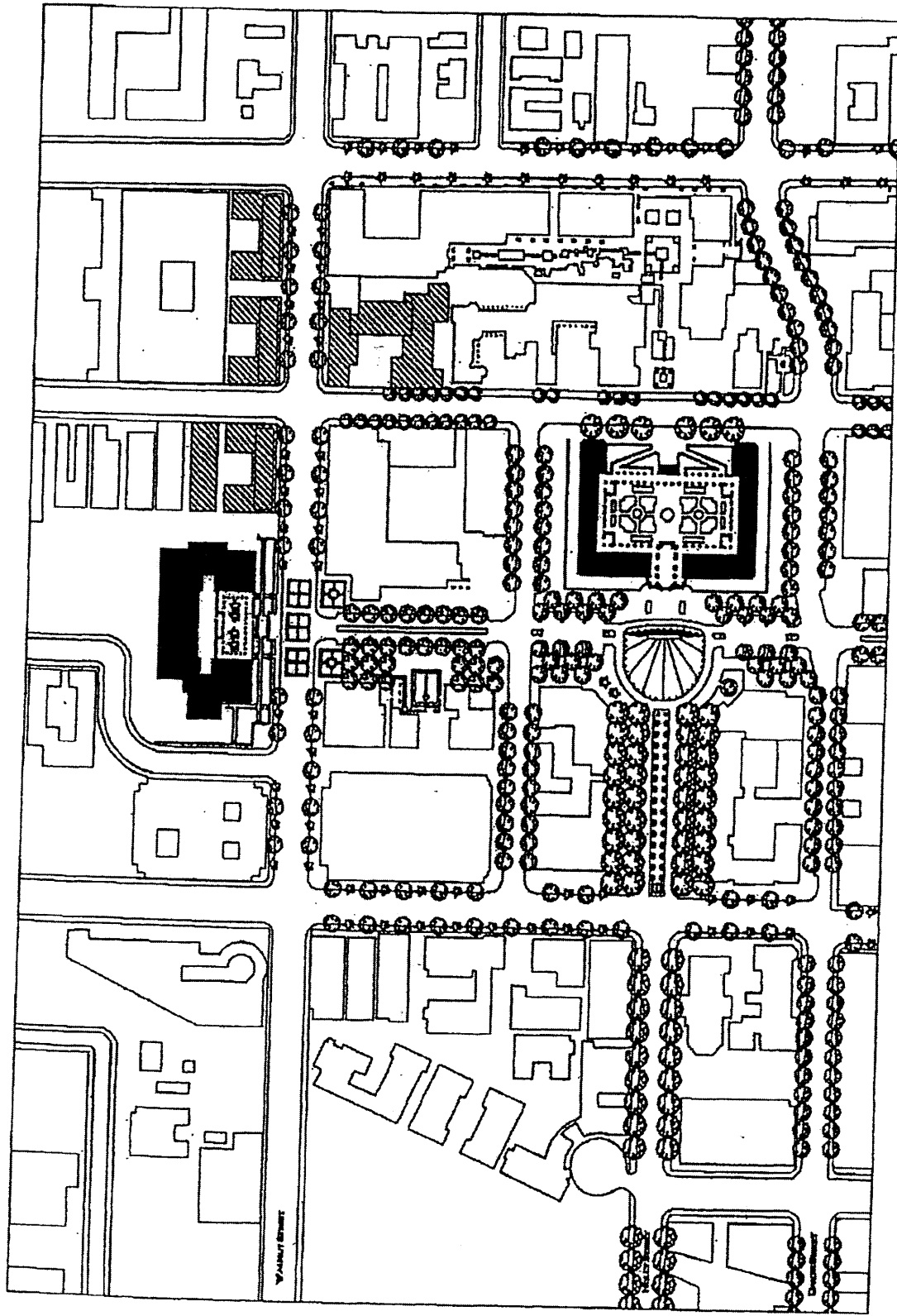
Thank you for your attention and consideration.

Sincerely,

/s/ Nina Chomsky

Nina Chomsky

DEVELOPMENT ENVELOPE DIAGRAM



PLAN

WALNUT / EUCLID
BLOCKS