

CORRESPONDENCE



Culture, Commerce and Community in the Heart of Pasadena

August 6, 2015

Honorable Terry Tornek, Mayor of Pasadena
 Members of the Pasadena City Council
 City of Pasadena
 100 N Garfield Avenue
 Pasadena, CA 91109

RE: General Plan Update Final EIR and Land Use Element

Dear Mayor Tornek and Members of the City Council:

As a long-time participant in the current General Plan Update process, the Playhouse District Association (PDA) appreciates the many years of work that have gone into the creation of the proposed Land Use Element, Mobility Element and associated Final Program Environmental Impact Report (EIR). We have continually expressed our support of opportunities for future growth and development in the Central District to assure that Pasadena continues to be an economically strong city through 2035, with a great Central District where people can live and work in a walkable area that is the hub of Pasadena.

We remain ardent supporters of the Proposed Project and feel it is critical to understand the impacts of selecting the proposed lower development caps as you consider the adoption of the new General Plan. For reference, the development caps being proposed for the Central District can be found in this table:

ALTERNATIVES	RESIDENTIAL CAP	RESIDENTIAL DIFFERENCE FROM PROJECT	NON-RESIDENTIAL CAP	NON-RESIDENTIAL DIFFERENCE FROM PROJECT
Proposed Project	4,885 units	0 units	3,379,000 sf	0 sf
Hybrid of Development Caps (<i>Staff Recommendation & Approved by Planning Commission on July 22, 2015 – note this Alternative not studied in the EIR</i>)	4,272 units	-613 units	2,112,000 sf	-1,267,000 sf
Central District, South Fair Oaks and Lincoln Avenue Alternative	3,660 units	-1225 units	2,112,000 sf	-1,267,000 sf
Efficient Transportation Alternative (<i>Approved by Transportation Advisory Commission on July 16, 2015</i>)	4,885 units	0 units	3,379,000 sf	0 sf
Reduced Air Quality and Noise Impact Alternative	4,885 units	0 units	3,379,000 sf	0 sf

As is apparent in the table, the proposed “Hybrid Alternative” reduces Central District development caps by 613 residential units and 1,267,000 square feet of non-residential uses. The Hybrid Alternative

development cap has implications that would stymie Pasadena's goals in the Land Use Guiding Principles; reduce walkability; increase the vehicles miles traveled per capita; create a development moratorium if not amended; and reverse the economic vitality of the Central District, which we lay out below.

We therefore heartily endorse the Proposed Project and associated development caps (found also in the Efficient Transportation Alternative, approved by the Transportation Advisory Commission) as described in the EIR, and strongly encourage the City Council to adopt this version of the Land Use Element. Adoption of the Proposed Project development caps provides the following benefits to the City of Pasadena, including its residential and business communities:

Consistency with previous Council direction and General Plan Guiding Principles and Objectives: The staff-recommended Hybrid Alternative, which was not formally studied in the EIR, arbitrarily lowers residential capacity by 13% and non-residential capacity by 38%, deviating significantly from the studied project as directed by City Council and are lower than staff's original 2013 non-residential cap recommendation of 2.5 million square feet. Importantly, the Hybrid Alternative's reduced capacity does not support the General Plan Guiding Principles and objectives as much as the Proposed Project. Higher development caps found in the Council-directed Proposed Project, *will* support all of the Council-approved General Plan Guiding Principles and Objectives, focusing on targeted growth in the Central District, a vibrant economy with a jobs-housing balance, and non-automobile mobility.

Reduced Vehicle Miles Travelled (VMT) per capita: The Hybrid Alternative, as described by staff, uses development caps in the Central District, South Fair Oaks and Lincoln Avenue (CDSFOLA) alternative as a baseline. Despite being the "environmentally superior" alternative in the EIR, VMT per capita with the CDSFOLA alternative is *higher*, even with less future development. Importantly, the four areas of Significant and Unavoidable Impact (Air Quality, Greenhouse Gas Emissions, Noise, and Transportation and Traffic) are *not eliminated* with the CDSFOLA Alternative. In addition, the EIR predicts less than a 1% increase in water usage above current levels with the Project buildout. Thus, if VMT per capita are higher, other impacts are still not improved, and no discernable water savings are realized, the Hybrid Alternative's efficacy is unclear at best. The Proposed Project's development caps, however, realize the benefits of the Central District's walkability and transit infrastructure by encouraging more housing and jobs to be in close proximity. By better supporting the Guiding Principle of being able to get around Pasadena without a car, the Proposed Project results in reduced VMT per capita.

Avoidance of Future Moratorium, General Plan Amendment and/or new EIR: A primary objective of any General Plan Update is to provide a plan for up to 20 years of potential growth. With over 1 million square feet of non-residential development in the near-term pipeline, the Hybrid Alternative development caps of 4,272 residential units and 2,112,000 square feet of non-residential development would mean that 50% of the non-residential development capacity will likely be spoken for in the short-term after the General Plan is adopted. Thus the City could be faced with the reality of a moratorium, costly and lengthy General Plan Amendment and EIR process, or other negative implications if the lower cap is reached years before 2035. The Proposed Project will help ensure that a true 20-year implementable plan is in place with

enough flexibility to adjust for future conversion of residential to non-residential or vice-versa within the Central District.

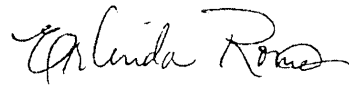
More Vibrant Central District Economy, Benefitting Pasadena Residents: Pasadena's economic and fiscal health are linked to the ability of the Central District to maintain its roles as the robust economic center of the City and as a competitive regional employment destination. The Hybrid Alternative's lower development caps would limit the Central District's ability to accommodate infill development, resulting in fewer jobs available to Pasadena residents in construction, retail, office and other professions. In addition, the City would reap less property tax revenues under this alternative. The adoption of the Proposed Project development caps will ensure that the Central District is able to welcome new jobs and housing where transportation infrastructure is best equipped to support them, thus providing the City and its diverse residents greater opportunity for economic success and general fund revenues to pay for City services.

We urge the City Council to recognize the pivotal role that Central District growth plays in realizing both the City's environmental and economic goals, and to select a final General Plan alternative that provides development caps of 4,885 units and at least 3.37 million square feet of non-residential capacity in the Central District. The Hybrid and CDSFOLA alternatives should not be adopted since there is *failure to meet most of the project objectives, and for its inability to avoid significant environmental impacts as per Guidelines Sec. 15126.6[c]*. Help us maintain the momentum in the Playhouse District to ensure a healthy, vibrant economy for Pasadena.

Sincerely,



William Chu
Chair



Erlinda Romo
Executive Director