

LETTER REGARDING THE YWCA/KIMPTON HOTEL PROJECT

Dear Mayor Tornek and Pasadena City Council:

As a life-time resident of Pasadena, I have seen many projects being built in the city—many of them improving the economic health and well-being of its residents and some which have been of dubious value. With all the changes in the City of Pasadena, however, the constant has been its pride of place and the value placed on its City Hall and surrounding Civic Center. Thus, any development within this area must improve, not detract from this historic place.

The proposed YWCA/Kimpton Hotel Project as presented in its initial plan as examined in the EIR does threaten the Civic Center. Not only does it take away much-needed open space in the Central District, but it imposes an over-sized commercial building on an iconic space dedicated to civic use. One might wonder why a hotel is the best use of this land. Civic center buildings should promote civic uses, such as museums and cultural activities, in addition to housing city functions. They should not exist just to further the economic “well-being” of the city.

The initial use of the Julia Morgan building was a YWCA which gave women low cost housing and recreation, also a civic function. Still existing in the civic center is a facility for indigent men. I believe that one of the goals of the City is to provide low-cost housing in the Central District. This project could offer that opportunity.

If the City of Pasadena is committed to building a hotel on city property in order to provide a “financially viable use”, it should also have facilities open to public use and a lower profile, valuing sight lines to the City Hall and San Gabriel Mountains from other buildings in the area. Traffic patterns should be respected as well as open space considerations.

This is project that will have a major impact on the historic Civic Center, as well as the Central District and the City of Pasadena.

Sincerely,

Mary B. Wynton, President of Casa Torre HOA and member of the Downtown Pasadena Neighborhood Association (DPNA)

601 E. California Blvd. #305 , Pasadena CA 91106

08/15/2016
Item 10

Martinez, Ruben

From: CityWeb-Server@cityofpasadena.net
Sent: Friday, August 12, 2016 4:52 AM
To: Official Records - City Clerk
Subject: WWW COMMENT

Data from form "Contact City Clerk Mark Jomsky" was received on 8/12/2016 4:52:21 AM.

Send Comments

Field	Value
Your Name	John Fauvre
Phone	626-796-4432
Email	Johnfauvre@gmail.com
Comments	Dear Sir: Please forward this to the City Council for the Monday meeting concerning the YWCA building. The discussion seems to omit facts about financial benefits to the City from the revenues from the proposed long term lease of the land and from the reduction in the costs of maintaining the property. Shouldn't these be publicly disclosed, at least in general terms, to better allow residents to evaluate the proposal? Regards, John Fauvre 530 S. Arroyo Blvd.

Email "WWW COMMENT" originally sent to OfficialRecords-CityClerk@cityofpasadena.net from CityWeb-Server@cityofpasadena.net on 8/12/2016 4:52:21 AM.

Martinez, Ruben

From: patti wellsmc <pwellsmc@gmail.com>
Sent: Thursday, August 11, 2016 7:39 PM
To: Tornek, Terry
Cc: cityclerk
Subject: Park takeover by Kimpton hotel

I vote NO. We need our open spaces.
We need parking and less traffic too.
Slow down all this building!
Patti McMillan

Novelo, Lilia

Subject: FW: YWCA building

From: Karen Wolfe <karenerak5@gmail.com>

Date: August 11, 2016 at 10:43:33 PM PDT

To: <mjomsky@cityofpasadena.net>

Subject: YWCA building

To Whom It May Concern,

Please do not let the YWCA Building slip away. This is a treasure, one of Julia Morgan's creations. It is beautiful and majestic, definitely worthy of the great city of Pasadena.

Thank you for your commitment to our historic heritage.

Karen Wolfe

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*
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Be nice to other's, not because they are but because you are.

=^..^=

**MARSHA V. ROOD, FAICP
216 S. Madison Avenue, #302
Pasadena, CA 91101
August 12, 2016**

marsharood@earthlink.net

Submitted by e-mail via kevinjohnson@cityofpasadena.net

Mayor Terry Tornek
Members of the City Council
City of Pasadena
100 N. Garfield Avenue
Pasadena, CA 91101

**Re: Comments on YWCA/Kimpton Hotel Project: Sale of Surplus Real Property and
Final EIR, 78 N. Marengo Avenue; YWCA/Kimpton Hotel Project, Agenda Item 10, August 15,
2016 City Council Meeting**

Dear Mayor Tornek and Members of the City Council:

As a member of the Pasadena Civic Center Coalition, I would like to add the following comments to the administrative record concerning the proposed YWCA/Kimpton Hotel Project in the Civic Center:

1. APPLICABLE GOVERNMENT CODES

The sale/lease of the parkland across from City Hall is governed by two government codes: The State of California's Government Code Section 54220 "Surplus Land Act", and the City of Pasadena's Municipal Code Chapter 4.02 "Sale of Surplus Real Property." **Importantly, "sale" is defined in Chapter 4.02 of the Municipal Code as including a lease of city-owned property for a term in excess of fifteen (15) years.**

These two laws establish the process by which the City determines how its real property is to be surplus, sold, leased or developed.

2. SUMMARY AND CONCLUSIONS

A. The City has violated the State of California "Surplus Land Act" (California Government Code Sections 54220 – 54232) because it failed to offer the parkland (aka "Parcel 3" as shown in the Project site plan) for low and moderate income housing, park/open space and recreational purposes, and for the clustering of housing and commercial development within walking distance of a major transit station (such as the Memorial Park Station on the Metro Gold Line).

B. The City has violated Municipal Code Chapter 4.02 "Sale of Surplus Real Property" because it failed to comply with the requirements of the Code for the reasons set forth here and further described below:

- **The process was not public** (ref. Section 4.02.011 – “Policy”): Although the Municipal Code clearly calls for *early* involvement in deciding whether or not City public land is to be leased or sold, the lack of transparency and integrity of the process used for this project are well documented and evident. In short, the process is being done at the back-end not the front-end as it was intended by the Municipal Code.
- **The parkland is needed for the purpose for which it was acquired or for any other public purpose** (Ref. Code Section 4.02.011 – “Policy”): The City’s position is that the parkland is no longer needed for public purposes. However, the public purpose for which the parkland was acquired was **to fulfill the voter-approved 1923 Civic Center City Beautiful Bennett Plan that has largely been fulfilled in the Civic Center**. Also, the dearth of park space and open space in the Central District (aka “Downtown”) is well documented and increasing its supply is a matter of public policy as stated in the City’s General Plan, the Central District Specific Plan, the Green Space Element and the Open Space Element. ***Eliminating 80% of the parkland facing Holly and Garfield does the opposite.***
- **The Project is not exempt from the sale of surplus real property ordinance** (ref. Code Section 4.02.040 – “Sales not subject to this chapter”): **In order to allow the transaction to be exempt from the competitive sale requirement, allowing the City to transfer the parkland at no cost to the developer, a “special finding” that the sale (or lease) must be made that there is “an extraordinary and overriding public benefit related to the economic and public well-being of other properties in the immediate vicinity.” No such findings can be or have been made.** (1) City staff simply posits that the Project will rehabilitate the YWCA (a property in the immediate vicinity) and therefore is of public benefit. This may be true, but there is no financial analysis to prove this hotel addition and operation Project is the *only way* it can be done; (2) an “extraordinary and overriding public benefit” was not described, defined and voted upon in a public meeting of the Planning Commission and/or at a City Council meeting in Open Session *before* the Request for Proposals (“RFP”) was circulated to the development community and *before* the parkland was treated as exempt from competitive bidding to the highest bidder; (3) City Council-approved policies do not call for a commercial “revitalized and rejuvenated” Civic Center; (4) according to Cape Point Development, the “Grayson” developer, the planned 60 foot high YWCA/Kimpton Hotel Project across Union Street to the north will block views of the San Gabriel Mountains and City Hall from the Grayson project, thereby reducing the value of the planned condominiums; and (5) the Project is expected to have a detrimental impact on the historic YWCA building - the new construction is approximately twice as high as the YWCA, overwhelming this historically significant property, and the planned hotel loading and drop-off area removes a significant portion of the long-standing sidewalk, grass, trees and lights at the YWCA’s Marengo Avenue façade, severely compromising and impacting this character-defining feature.
- **The sale is subject to Chapter 4.02** (Ref. 4.02.040 – “sales not subject to this Chapter”): (1) Given values in the area, ***the parkland would not be valued at \$10,000 or less***, as required for an exemption; (2) the property is ***not to be quitclaimed*** for the purpose of clearing title to real property owned by others, as required for an exemption; (3) ***the lease (sale) is not a quitclaim to the owner of record redeeming property for a tax sale***.

to the City, as required for an exemption. In fact, the City owns the parkland and the YWCA property; (4) **the lease (sale) of the parkland is not being made to another public entity**, as required for an exemption; (5) **the lease (sale) is not for any right to receive electric energy reflective of reasonable value**, as required for an exemption; (6) this sale (lease) is not to an adjacent landowner of surplus residentially zoned real property, as required for an exemption, and (7) **the (sale) lease is not to a current lessee or sublessee of City-owned real property with not less than 15 years remaining on the lease or sublease**, as required for an exemption.

SUMMARY: If the parkland were recommended to be included in the RFP, the "Sale of Surplus Real Property" Municipal Code Chapter would have been applicable before this land was included in any RFP and a determination made as to whether or not the parkland was "...needed for the purpose for which it was acquired or for any other public purpose." According to the Chapter, exceptions for competitive sales requirements can be made "...only if ...it has made special findings, *after public hearing*, that an extraordinary and overriding public benefit will be achieved." [emphasis added] According to the Chapter, included in the definition of public benefit are "...public parking, low-cost housing, a public service facility, or a museum or other cultural or artistic institutions, or the economic and public well-being of other properties in the immediate vicinity." This determination was *not made public* before the City offered this public land for sale in the RFP and may or may not have been made in a Closed Session of the City Council - the public has no way to know. In this specific case, the existing zoning is not at issue because the City could rezone its own land - it has the authority to do so.

In conclusion, removal of 80% of the parkland along Holly and Garfield would be counter to long-standing policies of the City and counter to the argument that the public parkland is not needed for public purposes. In fact, the YWCA/Kimpton Hotel Project is expected to have *detrimental* effects on to the economic and public well being of other properties in the immediate vicinity.

3. PROCESS APPROPRIATE TO PASADENA

How should the process have been done? The basic problem is that the financial numbers are driving the size, massing, scale and site plan of the Project *instead of the desired project driving the numbers*. In order to best define the desired Project from the City's standpoint, the Civic Center/Mid-town Implementation Task Force (the "Task Force") created in 1998 should have been convened to define the range of uses desired for the Project, whether or not the parkland should be included in the RFP, and how to reconfigure/improve the large concrete area in front of City Hall known as "Centennial Plaza." Its recommendations would have to have been approved by the City Council. As a matter of record, the Task Force was engaged previously in 2007 to decide on: (a) a proposed change in the species of tree on Holly Street, and (b) a proposed change in the paving pattern in front of the Civic Auditorium for recommendation to City Council. Surely, the YWCA/Kimpton Project rises to at least the level of importance of these two other issues.

Worse is the city's flaunting of its own regulations in an *ad hoc* procedure further diminished by actions conducted without public involvement. This critical choice to alienate public parkland, originally purchased to create the Pasadena's City Beautiful Civic Center,

recognized in the National Trust Register of Historic Places and financed pursuant to public referendum, has indeed undermined core Pasadena values. Community consensus drove the original purpose to enhance Pasadena's standing as a coherent well-planned community on the national stage.

4. CONCLUDING STATEMENT

In my experience as the City's Development Administrator for eighteen (18) years with responsibilities for redevelopment and economic development, ***front-loading community involvement increases trust in government, leads to more creative answers, and speeds the process enormously.*** These factors also create a strong economy with high property values and sales revenues. ***The current disregard of public participation in pursuit of parcel-by-parcel development will achieve the exact opposite of increased real estate values in the city over the long run.***

A public and transparent processes in real estate development reduce the risk and speculative nature of investments, better guaranteeing that developers play by the same rules and better ensuring certainty. ***In fact, this is The Pasadena Way and why Pasadena is a greatly admired city – not only for its sense of place, but also for its citizens' direct involvement in city making.***

Thank you for the opportunity to comment. I hope that my analysis is helpful to you in your deliberations.

Sincerely,

Marsha V. Rood
MARSHA V. ROOD, FAICP
Pasadena Civic Center Coalition

DETAILED ANALYSIS FOR CHAPTER 4.02 "SALE OF SURPLUS REAL PROPERTY"

I. OVERVIEW OF MUNICIPAL CODE CHAPTER 4.02 "SALE OF SURPLUS REAL PROPERTY"

This Chapter states as follows: "It is the policy of the board of directors of the city that the process by which the city land is determined to be surplus and is sold, leased or developed, and the records relating thereto, shall be open to public examination and any disposition of such land shall be accomplished through a publicly noticed, competitive process, available to all interested persons. In disposing of surplus land, unless some extraordinary and overriding public benefit is intended and obtained in consideration of the transaction, the city shall seek the highest monetary return, consistent with the interests of city and community needs." According to Section 4.02.010, "surplus real property" means real property the city does not need for the purpose for which it was acquired for or any

other public purpose. Importantly, according to the same section, "sale" includes a lease of city-owned property for a term in excess of fifteen (15) years.

II. APPLICABILITY TO PARKLAND DISPOSITION

This Chapter applies to the disposition of the City's Civic Center parkland in order to make it available for sale or lease for the planned hotel. At its core, the process the City is using does not follow this Chapter. The lack of transparency and integrity of the process are evident and the process is being done at the back end not the front end as it was intended.

III. PROCESS: WAS IT PUBLIC? NO.

- A. **June 6, 2012:** The Request for Proposals (RFP) for the disposition of the parkland of the SWC of Holly Street and Garfield was presented to City Council's Economic Development and Technology ("ED Tech") Committee as an information item only - no vote was taken.
- B. **Most importantly, the City Council was not asked nor did it approve the sale or lease of this land in an Open Session by voting on the RFP** – RFPs are used to obtain consulting services, not for the sale of real property. According to the then Assistant City Manager, this land or "dirt" was "thrown in to sweeten the deal" in the RFP *even before there was a "deal"*. In fact, this action showed lack of confidence in the proposed real estate transaction. In my experience, this is not a good negotiation strategy. As the Chapter states, the process by which city land is determined to be surplus "...shall be open to public examination."
- C. **July 30, 2012:** The RFP was released with no input from the Planning and Community Development Department before being released to potential proposers. There were six proposers, but who the other five were or their proposals is not public information according to the City Staff. An Advisory Review Panel evaluated the proposals, but the names of those on the Panel are not public information either.
- D. **February 11, 2013:** The selected proposer was presented at a Closed Session of the City Council and the Exclusive Negotiation Agreement (ENA) was approved in Closed Session. The ENA contains financial information that is important – this information drives the height, massing and site plan for the proposed Project.
- E. **May 1, 2013:** City Staff executed the ENA for a 120-day period with Kimpton (now known as KHP III, LLC, individuals formerly associated with Kimpton Hotels). **The City has not released this ENA to the public to this day** - the reason stated is that it has "proprietary" information in it. Basically, proprietary information is not included in an ENA because ENAs are *public documents*.
- F. **March 17, 2014:** The first time the City Council reviewed the project in Open Session was for a Predevelopment Plan Review (PPR) – over ten (10) months after the ENA was signed.

Should these public parklands be made available for sale or lease? This question

should precede the consideration of all successive actions – the City placed the cart before the horse - the process disregarded this first order question.

A reasonable person could conclude that the meetings regarding the disposition of the parkland property were not publicly held open meetings to address this first order question and the process conducted by city officials which included committing public parkland to private use, violate the City's own regulations.

IV. IS THE PARKLAND NEEDED FOR THE PURPOSE FOR WHICH IT WAS ACQUIRED OR FOR ANY OTHER PUBLIC PURPOSE? YES.

MUNICIPAL CODE SECTION 4.02.010 – DEFINITIONS states that surplus real property is “...real property of the city not needed for the purpose for which it was acquired or for any other public purpose.” **SECTION 4.02.011 – POLICY** further states that “...unless some extraordinary and overriding public benefit is identified”, “...the city shall seek the highest monetary return consistent with the interests of city and community needs.” **SECTION 4.02.020 – SALES SURPLUS REAL PROPERTY** further states The “surplus real property may be sold only after an open and competitive bidding process to the highest bidder, determined on the basis or current value of consideration to be paid, in accordance with the provisions of a public notice inviting bids.” **HOWEVER, STAFF’S ARGUMENT #1 (PG. 29 OF ATTACHMENT A TO CONDITIONAL USE PERMIT #6279) IS THAT THE PARKLAND IS NOT NEEDED FOR THE PURPOSE FOR WHICH IT WAS ACQUIRED OR FOR ANY OTHER PUBLIC PURPOSE. ALSO, THE STAFF REPORT IS SILENT AS TO THE APPRAISED VALUE OF THE PAKLAND AND AS TO WHETHER OR NOT AN APPAISAL OF THE PARKLAND WAS PERFORMED.**

A. The public purpose for which the parkland was acquired was to fulfill the Civic Center City Beautiful Bennett Plan purposes as described in the voter-approved 1923 Bond issue and the City Plan. This description included “a building, together with suitable appurtenances, grounds and approaches.” [emphasis added] The City Plan and the Bonds for land acquisition and construction were approved by 80% of the voters. The parkland was subsequently purchased in 1924 as part of the “grounds” and, therefore, is part of the public purpose for developing the Civic Center in accordance with the voter-approved City Plan and the Bonds. Nearly 80% of the existing parkland adjacent on the east to the YWCA building would be lost if the Project goes forward.

B. The dearth of park space and open space in the Central District is well documented and increasing its supply is a matter of public policy as stated in the City’s General Plan, the Central District Specific Plan, the Green Space Element and the Open Space Element. Eliminating 80% of the parkland facing Holly and Garfield does the opposite. All four of the above documents were approved by the City Council in Open Session with thorough public review and input. Moreover, recognizing the dramatic lack of parkland in the Central District in particular, the Municipal Code was amended in December 2014 to allow the Residential Impact Fee (RIF) to be used for acquiring land of less than one acre for parks and pocket parks, primarily benefitting the Central District. The General Plan and the Central District Specific Plan designate the Central District for “targeted growth” and the District is undergoing a building boom, especially

higher density multi-family residential projects. This is not discussed in the Staff report as a "public purpose" for the parkland.

V. IS THE PROJECT EXEMPT FROM THE SALE OF SURPLUS REAL PROPERTY ORDINANCE? NO

According to SECTION 4.02.030 "EXCEPTIONS FOR COMPETITIVE SALE REQUIREMENT," in order to allow the transaction to be exempt from the competitive sale requirement, thereby allowing the City to transfer the parkland at no cost to the developer, a "special finding" that the sale (or lease) must be made "an extraordinary and overriding public benefit related to the economic and public well-being of other properties in the immediate vicinity" must be determined. **HOWEVER, STAFF ARGUMENT #2 (PG. 29 OF ATTACHMENT A TO CONDITIONAL USE PERMIT #6279) IS THAT THE PROJECT IS EXEMPT FROM THE COMPETITIVE SALE REQUIREMENT.**

- A. City staff simply posits that the Project will rehabilitate the YWCA (a property in the immediate vicinity) and therefore is of public benefit. This may be true, but there is no financial analysis to prove this Project is the *only way* it can be done. Without a financial analysis available to the public, this is difficult to judge. For example, if the City invested the \$8.3 million for the purchase of the YWCA rather than trying to recapture it and/or realize a return on its investment, perhaps this Project could be downsized and removed from the parkland. Also, the repayment of the \$8.3 million could be treated as an investment in the Civic Center and the Rose Bowl and/or structured in the contemplated long-term lease to be returned over time and/or realized from net proceeds when the Project is sold. In addition, perhaps federal subsidies could be made available through new market and historic tax credits. The public does not know whether or not the City is selling the parkland to make money for the City or to receive the stated public benefit of rehabilitating the YWCA building. To the public's knowledge, other methods and/or financing strategies have not been explored which do not require use the parkland.
- B. An "extraordinary and overriding public benefit" was not described, defined and voted upon in a public meeting of the Planning Commission and/or at a City Council meeting in Open Session *before* the RFP was circulated and *before* the parkland was treated as exempt from competitive bidding to the highest bidder. It was simply "thrown" in the RFP to "sweeten the deal" prior to any approvals from City Council and/or the Planning Commission.
- C. City Council-approved policies do not call for a commercial "revitalized and rejuvenated" Civic Center; in fact, these policies call for the Civic Center to strengthen its role as the symbolic and governmental centerpiece of the City, encouraging the presence of civic, cultural and public service uses. Also, the YWCA is surrounded primarily by non-commercial public and religious institutions such as the Baptist Church, City Hall, the Police headquarters, the County Court house, the Library and a facility for homeless persons, all are non-commercial uses. Therefore, these buildings could not be commercially "rejuvenated." The only potential private enterprise to be located on Union Street adjacent on the south to the proposed Project is a condominium project called the "Grayson" (as described below).

- D. The planned "Grayson" 36-unit condominium project is a little less than 60 feet high and is adjacent on the west to the U.S. Post Office on the south side of Union Street. **According to Cape Point Development, the "Grayson" developer, the planned 60 feet high KHP III, LLC hotel across Union Street to the south will block views of the San Gabriel Mountains and City Hall from the Grayson project, thereby reducing the value of the planned condominiums.** At the time that the developer committed to investing in the property and began design development, however, the building height, massing and scale of the new hotel construction were not known. Knowledge of these factors would have played a crucial role in making the investment decision to go forward with the "Grayson" project and may affect its profitability. **Therefore, the YWCA/Kimpton project is expected to have a detrimental impact on the Grayson condominium project.**

- E. **The Project's new construction is approximately twice as high as the YWCA, overshadowing this historically significant property.** In addition, the planned passenger loading and drop-off area removes a significant portion of the long-standing sidewalk, grass and trees on the YWCA's Marengo façade, severely compromising and impacting this character-defining feature. **Therefore, the Project is expected to have a detrimental impact on the historic YWCA building.**

VII. IS THE SALE (LEASE) SUBJECT TO CHAPTER 4.02 (Ref. 4.02.040 – "sales not subject to this Chapter")? YES

- A. Given values in the area, ***the parkland would not be valued at \$10,000 or less***, as required for an exemption and as determined by the City Manager and the City Council.

- B. The property is ***not to be quitclaimed*** for the purpose of clearing title to real property owned by others, as required for an exemption.

- C. ***The lease (sale) is not a quitclaim to the owner of record redeeming property for a tax sale to the City***, as required for an exemption. In fact, the City owns the parkland and the YWCA property.

- D. ***The lease (sale) of the parkland is not being made to another public entity.***

- E. ***The lease (sale) is not for any right to receive electric energy reflective of reasonable value***, as required for an exemption.

- F. It is ***not the sale (lease) to adjacent landowner of surplus residentially zoned real property.***

- G. ***The (sale) lease is not to a current lessee or sublessee of real property owned by the City with not less than 15 years remaining on the lease or sublease.***

Martinez, Ruben

Subject: FW: YMCA restoration

From: Sally Fee <sallypfee8@gmail.com>
Date: August 12, 2016 at 10:58:48 AM PDT
To: <mjomsky@cityofpasadena.net>
Subject: YMCA restoration

I would be very happy to see the building restored as I taught aerobics there for five years back in the 70's! Love that beautiful high ceilinged gym...

Along with Pasadena Heritage I support Alternative A described in the EIR.

Thank you

Sally Fee

Martinez, Ruben

Subject: FW: City Council and the Kimpton-YWCA Project

From: Nancy Adelman <nancyadelmanla@gmail.com>

Date: August 12, 2016 at 11:08:31 AM PDT

To: <mjomsky@cityofpasadena.net>

Cc: <jlattig@pasadenaheritage.org>

Subject: City Council and the Kimpton-YWCA Project

Dear Pasadena City Council:

Thank you for considering saving and returning the former YWCA building designed by Julia Morgan.

Along with the Pasadena Heritage I support the Alternative 2A described in the EIR.

Pasadena and Los Angeles County is fortunate to have this wonderful building. Again, thank you for all you do to maintain Pasadena as a first class city.

Sincerely,

Nancy Adelman

Martinez, Ruben

Subject: FW: YWCA re-use

From: "Caroline B. Jones" <carolinej@charter.net>

Date: August 12, 2016 at 11:37:49 AM PDT

To: <mjomsky@cityofpasadena.net>

Subject: YWCA re-use

As a Pasadena resident, I definitely support the re-use of the Julia Morgan YWCA building. I have pleasant memories of hours of aerobics classes there, and It's great to think re-use is possible.
Caroline B. Jones

Martinez, Ruben

Subject: FW: Message to Mayor Tornek and City Council about YWCA/Kimpton Hotel Final EIR and Project Approvals
Attachments: image001.gif

From: "Lipsig, Ethan" <EthanLipsig@paulhastings.com>
Date: August 12, 2016 at 2:07:31 PM PDT
To: "'mjomsky@cityofpasadena.net'" <mjomsky@cityofpasadena.net>
Subject: Message to Mayor Tornek and City Council about YWCA/Kimpton Hotel Final EIR and Project Approvals

As a long-time Pasadena resident, I strongly urge the City Council to approve the YWCA/Kimpton Hotel Project Alternative 2A and the final EIR at its August 15, 2016 meeting.

Those who would derail this project in hopes of preserving a little more open land or securing other changes are missing several key points: Derailing this project at a minimum will probably delay restoration of the historic YWCA building for at least five years because of the time it would take for a new project to be designed, approved, and commenced. During that delay, YWCA building, which already has been vacant for 20 years, will further deteriorate, perhaps irrevocably. If the building ultimately is restored, it is unlikely that it will be restored as nicely as Kimpton intends to do. Finally, the delay will undoubtedly cost the City a significant amount, by delaying the commencement of rental income on its at least \$8 million investment in the property, occupancy taxes, and sales taxes or other revenues on the extra local business that Kimpton hotel guests would have generated. That lost business also will hurt local businesses.

Alternative 2A is a reasonable one. You should approve it and the Final EIR. The long-overdue restoration of the YWCA not be further delayed.

Very truly yours,

Ethan Lipsig



Ethan Lipsig | Retired Partner

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www.paulhastings.com

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August 12, 2016

Mayor Terry Tornek and Members of the Pasadena City Council
100 North Garfield Avenue
Pasadena, CA 91101

RE: August 15, 2016 City Council Agenda Item 10
YWCA EIR Certification and Related Items

Dear Mayor Tornek and Council Members,

I am a 38 year resident of the City of Pasadena, immediate past chair of the Pasadena Heritage Board of Directors, and a 40 year real estate professional in both the private and public sectors. I am writing you to encourage your support and positive vote for the staff recommendations and specifically YWCA Alternative 2 A with the modifications proposed by the Planning Commission.

I want to complement the city staff, the developer and the members of the public who have been engaged in the development of the plans for the Julia Morgan YWCA. The property is clearly one of Pasadena's most important historic properties. The city's unprecedented action to acquire the site to halt its continued deterioration is evidence of the property's importance. The result of the four year + process to bring a thoughtful, reasoned proposal to the City Council is now before you.

To achieve the many objectives of the City and community on such a project is a daunting task, particularly when inevitably some of the objectives are conflicting. To make a decision then requires applying a hierarchy to the objectives. To me the objectives that are most important are three:

- Preserving the historic and architectural integrity of the Julia Morgan YWCA
- Preserving the goals of the Civic Center Plan, and particularly the objectives of the Bennett plan
- Allowing a commercial development that is appropriate to the Civic Center, makes the fewest interventions in the historic fabric of the YWCA, and is financially sustainable.

The extensive staff report addresses the first two of these objectives, demonstrating that the YWCA will be protected, enhanced and, importantly, put back into a use that will allow the public to experience it. The Bennett plan is being respected and implemented.

With regard to the third item, I believe the hotel use is most appropriate, given its quasi-public nature, its limited traffic impacts and its contribution to the civic space by providing activity after the 8 to 5 business hours. I realize there has been some suggestion that the number of proposed hotel rooms should be reduced. And while the public has yet to see the economic analysis of the business proposal (not the subject of the meeting on the 15th) I expect a transparent presentation of the economics will support the staff and consultant conclusion that the size of the hotel has been minimized to that absolutely necessary to make the hotel economically sustainable.

Thank you for your consideration.

Sincerely

Cal Hollis
885 South Orange Grove Blvd. #31
Pasadena, CA

08/15/2016
Item 10

Martinez, Ruben

Subject: FW: YW E-Mail To Mayor and CC
Attachments: Bennett Plan White Paper 1.pdf; ATT00001.htm

From: "Stefanos Polyzoides" <spolyzoides@mparchitects.com>
To: "Jomsky, Mark" <mjomsky@cityofpasadena.net>
Cc: "Johnson, Kevin" <kevinjohnson@cityofpasadena.net>, "Reyes, David" <davidreyes@cityofpasadena.net>, "Duyshart, Eric" <eduyshart@cityofpasadena.net>, "Klug, David" <dklug@cityofpasadena.net>, "Tornek, Terry" <ttornek@cityofpasadena.net>, "Masuda, Gene" <gmasuda@cityofpasadena.net>, "Madison, Steve" <smadison@cityofpasadena.net>, "McAustin, Margaret" <mmcaustin@cityofpasadena.net>, "Kennedy, John" <JohnJKennedy@cityofpasadena.net>, "Hampton, Tyron" <THampton@cityofpasadena.net>, "Gordo, Victor" <vgordo@cityofpasadena.net>, "Andy Wilson" <awilson@rexter.com>, "Mermell, Steve" <smermell@cityofpasadena.net>, "Bagneris, Michele" <mbagneris@cityofpasadena.net>, "Reyes, David" <davidreyes@cityofpasadena.net>
Subject: Re: YW E-Mail To Mayor and CC

Dear Mark,

Please provide hard copies of the attached letter and attachment for Monday's City Council Agenda Item No. 10 to the Mayor, and members of the City Council. Please also have any questions regarding it directed to me.

Thank you, Stefanos Polyzoides

Dear Mayor Tornek and Members of the Council,

I am writing you this note to encourage you to vote in favor of the Certification of the EIR, the Determination of Surplus Land and the CUP & Zoning Entitlements for the YW Project.

In early 2015, and with the City's blessing, Moule & Polyzoides was hired by the developer to organize a design outreach process that assisted the development team in listening to a variety of community opinions re: the form of the new project in balance with the completion of our City's historic Civic Center. The outcome of this effort was to propose specific alternative designs for incorporation into the EIR on the YW project. The process lasted almost six months and involved eight different well-attended meetings. Altogether, about 30 community leaders took part.

Although the process did not result in agreement on a single project, it nonetheless produced a number of alternatives, some more relevant than others, that seriously informed the final EIR. More importantly and during this time, our office led the effort of deciphering the relevant historical evidence re: the Bennett plan and authored a white paper on its importance to the completion of the YWCA block. I have attached the document to this communication.

Beaux Arts Urban Design is an all or nothing proposition. The Bennett Plan, is so well conceived and drawn, that adherence to it means accepting it as a whole. Schemes that are 50% or 80% compliant are not consistent with the well worn ideas of classical urban and architectural design that the Pasadena Civic Center Plan of 1925 is a pure expression of.

Based on the evidence, the only EIR alternative that meets the spirit and letter of the Bennett Plan is Alternative 2A.

One final comment. We understand that the project has to go through an arduous Design Review process. Our office has had no part in the architectural design of the project to date. In fact, we believe that a project designed within the nationally prominent Civic Center of our City needs to be executed at a level of form and quality commensurate to its unique historic setting. Scheme 2A as currently presented, does not rise to this level of architectural prominence.

Yet, I am urging you to support the project at this time, and at the current state the development of its design, believing that it can be improved in time. Entitlement is a vital step right now, as it addresses the right to build a project of the generally right form, and in the right place within the Civic Center. The search for a better and final architecture through the public process can follow.

Sincerely, Stefanos

Stefanos Polyzoides

Principal

MOULE & POLYZOIDES, Architects and Urbanists

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The Bennett Plan: A White Paper

Stefanos Polyzoides

Pasadena, April 13, 2016

Introduction

The 2012 RFP for the development of the YWCA Block made repeated references to the obligation of potential responders to conform to the Bennett Plan for the Civic Center. Last year, I had the privilege to lead seven meetings of the Citizen Study Group on contextualizing the initial design of the YW/ Kimpton Hotel. In the process, and with the help of my colleagues at ARG, I examined in depth the available historical evidence regarding the origins of the Plan, helped frame the EIR project alternatives and pondered the relevance of the Plan's completion to the future of our City. Until last year, the Bennett Plan was something of a mystery to me. It is no more.

I would like to share this brief white paper, in the interest of demystifying the nature of the Plan and helping create consensus towards a virtuous completing our Civic Center precinct, one of the few remaining grossly incomplete places in Pasadena.

Who was William H. Bennett?

William H. Bennett (1874- 1854) was one of the most distinguished and influential architects and city planners in the history of our country. Born in England, educated at the Ecole des Beaux Arts in Paris, and with a national practice out of Chicago, he was involved in preparing some of the most famous American city plans of the early twentieth century. The Plans for Chicago and San Francisco (both with Daniel Burnham), for Minneapolis, Portland, and of course for Pasadena, among many others, were significant because they were authored in the course of the City Beautiful Movement, as part of the drive to legitimize and popularize City Planning throughout

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America. Bennett retired in 1940. His exit from the professional scene coincided with the steep decline of traditional planning that ushered in post war sprawl, and center city decay.

Why is the Pasadena Civic Center Plan important?

First and foremost, because it is the work of Bennett and the architects and civic leaders who collaborated with him on the design of its principal public buildings: Arthur Brown, Myron Hunt and George Bergstrom, all exceptional figures in the history of early twentieth century California Architecture. Also the astronomer George Ellery Hale who was the head of all three juries devoted to selecting the designs for City Hall, the Public Library and the Civic Auditorium, and the civic leader who had probably recommended Bennett, his fellow Chicagoan, for the Pasadena commission. Secondly, as a rare and unique national cultural monument, one of a dozen or so Civic Centers in the United States executed under the principles of Beaux Arts Planning and Design. Finally, because of its symbolic importance to Pasadena. Located in the heart of our city, the Civic Center is a beautiful and inspiring presence, a reminder of our civic commitment to a fair, transparent and inclusive government.

It is truly sobering to imagine that in 1923, a town of 50,000 people in the Far West could muster the vision and financial commitment necessary to produce an ensemble of civic buildings and places of this high level of cultural ambition.

Why should it be completed?

The Great Depression of 1929, and the weak economy that followed it till the beginning of WW2, slowed down and eventually derailed the completion of the Civic Center. Post war political and professional opposition to grand plans, classical buildings & landscapes and robust public spending on civic projects, ushered in a period of almost forty years of benign neglect. When reconstruction resumed, the process of urban renewal and freeway- centered modern urbanism beginning in the 1960's inflicted great damage to the Downtown of Pasadena, including the Civic Center. Citizen reaction to

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senseless new buildings, and the demolition of whole blocks of "blighted old buildings" was swift and lifted Pasadena to the national forefront in the quest for a preservation-centered urban revitalization. Among the many post- 1970 civic initiatives to preserve and reclaim the center of our city, a number of them included plans for completing the Civic Center: The Lyndon/ Buchanan Plan of 1988, the Moule & Polyzoides Plan of 1998 and the Arroyo Group Plan of 2001- 03. All three of these studies referenced the Bennett Plan.

The Bennett Plan and the now incomplete Civic Center that it generated are arguably Pasadena's most important cultural monument. A number of factors are converging in the direction of finally enabling its completion in the original: A steady and growing urban economy; The emergence of a robust center- city Real Estate market; City- wide support for the idea of a more vital and prosperous city center in balance between preservation and development; And a renewed interest in a traditional architecture and urbanism that can sponsor buildings, streetscapes and gardens that can match the grandness of the monuments on Garfield Avenue.

A completed classical Civic Center in Pasadena would be second only to San Francisco's in California and one of very few in the entire US. A source of civic pride, cultural prominence and economic development, it would confirm the place of Pasadena as one of the two or three most important cities in the Los Angeles region.

The Bennett Plan Design Process from 1923 to 1932

Citizens are entitled to their opinions. But the facts are the facts. The following is an attempt to set the factual record straight on the initial definition, design development and construction of the Bennett Plan to date, particularly on the sites fronting Centennial Plaza.

The planning process that guided the evolution of the Bennett Plan was circuitous. Most of the great Beaux Arts plans of the 1920's were completed, and following their adoption were published in a richly illustrated large folio format. This did not happen in Pasadena. Whether because of the lack of funds, political discord or the looming economic crisis,

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the Pasadena Plan evolved in fits and starts, and through various phases. It was always driven and also limited by the challenges of referendums, building campaigns, and political conflicts. It was the design and construction of the individual architectural projects within the Civic Center that ended up driving the final definition of the Plan, rather than the other way around.

Bennett began working behind the scenes on the Pasadena project in 1922. In 1923, a referendum was proposed for buying the Downtown land necessary to accommodate a new Civic Center and for securing the public resources needed to build its four principal buildings, the City Hall, Library, Art Museum and Civic Auditorium. Preceding the referendum, and also in 1923, Bennett prepared the first public preliminary plan sketches of the Civic Center and the two famous accompanying bird's eye perspectives, to bolster his City backers and to educate the voting public about the prospect of what this new Civic Center could become. The proposed civic buildings and the public spaces between them were described in provisional form, more as an urban design direction than as architectural form. In every sense, the 1923 sketches were conceptual in nature, based more on general intentions than a detailed building and place design response to a definitive City of Pasadena development program. The referendum was won by the promoters of the Civic Center Plan. But a second referendum in 1924, to determine the funding levels for various building projects within the Plan, failed.

During 1924 and 1925, architectural competitions were held for the three key buildings in the Civic Center. Their construction budgets and building schedules were set at more realistic levels. As a result, the winning schemes were both formally extraordinary and also buildable. Following, and in the course of 1925, Bennett included all three of these grand competition winners into a new Civic Center illustrative plan, drawn in the exquisite high rendering style of the Beaux Arts. This drawing incorporated three significant form components that set it apart from the 1923 sketch, and became the foundation of what we now recognize as the Bennett Plan: Drastically revised new and extraordinary buildings by the competition winners; A geometrically precise definition of the space between them in plan and in section; And the accompanying classical streetscape, appropriate for the public realm of a civic project of this formality and prominence.

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On May 4th, 1925, and on behalf of his firm, Bennett, Parsons and Frost, Bennett delivered to Stuart French, the Chairman of the Planning Commission, a 33- page typed letter dated April 30, 1925 and titled, *Report on a Plan for the City of Pasadena, California*. A 5- page Appendix called *Pasadena- The grouping of Public Buildings* was attached at the end of the Report. The document's cover letter said in part: "We are sending you herewith our report on the City Plan of Pasadena which embodies the elements of the plan, sets forth recommendations for the future, and presents data and arguments bearing on the Plan. We are also attaching glossy prints of the various drawings which may be used for reproduction in printing."

The Report was long on intentions, theory and poetry, but short on details. Most of the regulatory instructions on the proposed Civic Center were delivered through direct notes on the 1925 illustrative plan drawing itself. These included regulating lines and axes, dimensioned building footprints, setback lines, planting and hardscape patterns, and the like. It is on this document that the two sites facing City Hall on both the YM and YW sites were designated as *Automobile Space/ Future Building Site*. This regulatory assignment on these two properties has not been modified in the last 90 years and is in effect to this day.

In the absence of any other written report or later drawings, we have to assume that the 1925 report and the 1925 illustrative plan are the key instruments representing the wishes and instructions of Bennett, towards the eventual completion of the Pasadena Plan to his full satisfaction.

Over the remaining months of 1925 and into 1926 a number various very small adjustment were made to the illustrative plan. We know this from the dated notations of changes scribbled on the margin of its legend. These indicate that over this short time period, there was continuing input by the Planning Commission and ongoing clarifications on the street, block, public space and landscape patterns of the Civic Center.

As late as 1932 the City was involved in preparing the lot adjustments necessary to facilitate the building out of the Bennett Plan on the east side of the YM and YW blocks.

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For reasons too numerous to discuss here, no buildings were ever proposed to be built there, until now.

What are the original design principles embodied in American Beaux Arts Civic Centers?

By the 1920's, Americans were not strangers to Classicism, as it had been a familiar American residential and civic design strategy since beginning of the American Republic. Adopted from Europe to represent the virtues of democracy.

The classical compositional principles of the Bennett Plan were those commonly advocated by a generation of architects schooled in the Ecole des Beaux Arts in Paris at the turn of the 20th century. Bennett, Julia Morgan and Arthur Brown were all graduates of that school. These principles invariably produced monumental, large-scale, metropolitan urban buildings and spaces, of the kind that American students routinely encountered in all corners of classical European cities at the time. And which they aspired to introduce back into American cities upon their return.

The following are the form ingredients that best define the character of historic American Beaux Arts Civic Centers. They are the ones integrated by Bennett into the Pasadena Plan Report of 1925, and the illustrative plan of 1925-26. They were fully incorporated into the grand ensemble of Pasadena civic buildings and public spaces by their individual architects.

Our task of infilling the remaining sites of our Civic Center entails being strictly true to them:

Formality: There is a comprehensiveness about Beaux Arts architecture that knows no exceptions. All architectural elements, arcades, doors, windows, stairs, ornament, hardscape patterns, are without exception chosen to produce a monumental effect. Every particular design move is purposeful. No randomness, informality, arbitrariness or exception from the classical canon is tolerated.

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Axiality: Beaux Arts building ensembles are organized with reference to axes. Primary buildings are placed perpendicular to a main and secondary axis in order to be presented for maximum visibility and theatrical effect. Secondary buildings are placed parallel to an axis and across from each other at carefully chosen distances relative to their height, to define distinctive avenues, boulevards, promenades, esplanades, etc.

Unity: The architectural expression of buildings is relatively uniform. Architectural character can be diverse, but building style is always guided by the classical language in its materials, features, massing, and so forth.

Symmetry: The preferred architectural composition of all architectural elements on buildings is symmetrical. This is in the interest of increasing their scale and rendering them as monumental as possible.

Hierarchy: The architectural character of buildings varies based on their location. The buildings with the most dominant program are placed to terminate axes with the most important building terminating the main axis. Less important buildings are not as prominently placed, are of lesser massing, but share some of the key qualities of the dominant buildings, such as their height datums, three-part facade composition, common ground floor definition, coordinated and aligned entrance ways, etc.

Space Figuration: If architecture is about the design of buildings, then urbanism is about the design of public space through the positioning, massing and detailing of these buildings. In the Beaux Arts tradition, public space is grand, well formed, geometric, regular and very formal. Often defined by highly geometric streetscape and focused on public art. Most Beaux Arts Civic and Government Centers tend to be dominated by hardscape, in the tradition of their European urban precedents.

There are, nonetheless, a number of American examples of Civic Centers organized around parks. Particularly, in a Mediterranean climate, the use of allées of trees and small lawns can provide the kind of public space that is place and climate specific, a counterpoint to buildings while supporting their monumentality,

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What are the specific ingredients of the Bennett Plan that should determine the form of the YWCA- Kimpton project?

There is a way to fully understand and appreciate the completion of the Civic Center according to the Bennett Plan. It is to think of it as a task equivalent to completing a Greene and Greene bungalow, or a Wallace Neff mansion according to their original plans. All three project types would sit at the pinnacle of Pasadena's cultural heritage. All three would have to be carried out with the utmost degree of seriousness and respect for the explicit directions provided by their architects long ago.

The following form patterns would ensure that a new building on the YWCA block would be in conformance with the spirit and the letter of the Bennett Plan. All of these are necessary and interrelated. Picking and choosing among them, or wantonly modifying them in dimension or geometry, irrevocably destroys the prospect of completing one of the country's most unique civic places.

- A symmetrical plan placement of the new building relative to City Hall, measured against the center line of Garfield Avenue at 30/40 feet of setback;
- A 30/40 foot setback plan alignment that locates the new building in a way that reveals the entrances to the Post Office and Hale Buildings;
- A diagonal building facade that focuses on the center of Centennial Plaza and is symmetrically repeated on the YM block.;
- A secondary but prominent entrance into the new building from this diagonal facade;
- Maintaining the dimensional integrity of the park space of the Holly Street Promenade, and modifying the northern face of the YWCA to become a building front, matching the formality of the YMCA (Construction of YW predated the Bennett plan and its Holly Street elevation is that of an undistinguished side yard that was never meant to be seen from the public realm);
- Understanding the project as an addition to the YWCA block and the overall Civic Center, not the YWCA building alone. Maintaining the full interior and exterior integrity of Julia Morgan's design for the YWCA building;

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- Forming a series of in- block interconnected courtyards as outdoor gathering and transition spaces on the model of City Hall and the Public Library;
- Building the east- facing portions of the project to the height of the base of City Hall;
- Providing massing transitions to the existing YWCA building;
- Articulating the corner of Garfield and Union to provide an entrance and proper transition from the major to the minor faces of the YW block;
- Planting in a rhythmic geometric format, drawing in formality from the geometry of the surrounding buildings and spaces”
- Using every opportunity to activate the public space between the property lines and building faces all around the block;

Summary Assessment

1 The 30/40 setback EIR option is the only one that approaches conformance with the Bennett Plan. What final building form develops from this option is a matter of final architectural design, accommodating the patterns outlined above.

2 Completion of the Bennett plan will be accomplished only when all the patterns associated with the new design of the YW block are projected symmetrically across the center line of Holly Street onto the YM block. This simple form-based code regulatory assignment should be imposed on the YM block upon the approval of the 30/40 setback EIR option.

3 The loss of the informal and residual parks facing City Hall on both the YW and YM blocks is significant. It can be mitigated by a project to convert the 1 acre of bare concrete in front of City Hall into a city park worthy of the name Centennial Plaza. This project should also be initiated by the City concurrently with the approval of the 30/40 setback EIR option, and should be built within 24 months.

For those of you interested in a Powerpoint presentation illustrating many of the issues covered in this White Paper, please visit www.mparchitects.com/thoughts

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The End-

LAW OFFICE OF
MICHAEL J. COPPESS
1055 E. COLORADO BLVD., SUITE 500
PASADENA, CALIFORNIA 91106
TEL: (626) 744-9620

August 12, 2016

Email: mjomsky@cityofpasadena.net
Terry Tornek, Mayor
Members of the Pasadena City Council

RE: Kimpton Hotel Project

Dear Mayor Tornek and Members of the City Council:

I write in opposition to the proposed Kimpton Hotel Project. In my view, the project (as proposed and each of the EIR alternatives) should be denied.

Instead, the City should either (a) pursue a new project limited to Parcels 1 and 2 only or (b) proceed with a public process to *cohesively* plan the area due west of City Hall, including the current YWCA and YMCA blocks. That planning process should prioritize the unrivaled importance of both honoring the City Hall building and enhancing the Garfield/Holly intersection and adjacent open space as the center of Pasadena public life. A cohesive plan would maintain balance on the south and north sides of Holly.

In my opinion, the current project cannot be saved because the project goals are out of alignment with the land allotted for the project. So long as limited to Parcels 1 and 2, the goals of re-using the historic YWCA building and developing a boutique hotel of appropriate scale and character, are fine goals. Such a project would leave undisturbed the historic and gracious public space to the west of City Hall. By adding Parcel 3, however, the project went well beyond any YWCA re-use effort and directly placed in issue the entire west facing setting of City Hall.

The proposed project may present a solution for the historic YWCA building and provide cash to the city, but it recklessly re-designs City Hall's historic west facing setting to serve a private hotel. If there is to be any redesign of the western setting of City Hall, including historic open space along Garfield and Holly, that effort should serve City Hall (not a private hotel) and enhance the *public* life around City Hall. City Hall and the western setting along Garfield and Holly are too important to be re-designed in piece meal fashion or as secondary to a private hotel.

Under no circumstances should the City convert any of the public open space across from City Hall to private hotel use. Generations of Pasadenans have kept this land open and public. You should do the same.

Fortunately, according to the EIR, the City retained full discretion with regard to any proposal and is within its discretion to simply deny the proposal and start over. I urge you to deny the project including all EIR alternatives.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Coppess", written in a cursive style.

Michael Coppess

Novelo, Lilia

Subject: FW: Comments on YWCA/Kimpton Hotel Project; 78 N. Marengo Avenue; SCH No: 2015031023
Attachments: Pasadena CCC Comments to City Council re YWCA Kimpton.pdf; ATT00001.htm

From: Cynthia Kellman <cpk@cbcearthlaw.com>

Date: August 12, 2016 at 5:39:16 PM PDT

To: <ttornek@cityofpasadena.net>, <janastewart@cityofpasadena.net>, <mjomsky@cityofpasadena.net>, <pthyret@cityofpasadena.net>, <jwest@cityofpasadena.net>, <mlmorales@cityofpasadena.net>, <cbell@cityofpasadena.net>

Cc: Amy Minter <acm@cbcearthlaw.com>

Subject: Comments on YWCA/Kimpton Hotel Project; 78 N. Marengo Avenue; SCH No: 2015031023

Honorable Mayor and Councilmembers,

Attached please find a comment letter from Amy Minter regarding the above-captioned project.

Please feel free to contact me with any questions or concerns.

Cynthia Kellman
Chatten-Brown & Carstens
2200 Pacific Coast Highway, Ste. 318
Hermosa Beach, CA 90254
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08/15/2016
Item 10

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August 12, 2016

Submitted via email

Mayor Tornek and City Council Members
City of Pasadena
175 N. Garfield Avenue
Pasadena, CA 91101

**Re: Comments on YWCA/Kimpton Hotel Project; 78 N. Marengo Avenue;
SCH No: 2015031023**

Honorable Mayor and Councilmembers:

On behalf of the Pasadena Civic Center Coalition (Pasadena CCC), we provide these comments on the proposed YWCA/Kimpton Hotel Project. The Project would allow the demolition of most of the existing public landscaped park along N. Garfield Avenue and Holly Street to make way for construction of a new hotel building. The Project would also include the renovation of the existing YWCA building as part of the Kimpton Hotel complex. The Pasadena CCC has been closely following this Project and provided detailed comments on the draft environmental impact report (DEIR) as well as at subsequent Planning Commission and Design Commission meetings. We submit the following comments regarding the proposed Project, the adequacy of the final environmental impact report (FEIR), and the environmental review process for the Project.

The Pasadena CCC supports the rehabilitation of the historic YWCA building, but not at the needless expense of the historic public parklands along N. Garfield Avenue and Holly Street, which the City proposes to build upon. The Pasadena CCC encourages the development of a revised plan that provides for rehabilitation of the YWCA building and compatible new construction on the adjacent vacant parcel (parking lot – Parcel 2) in accordance with the Secretary of Interior's Standards for Rehabilitation. Such a plan must also preserve the public parklands, with rehabilitation of the YWCA building and new construction that is compatible in design and scale with all of the historic buildings and setting of the Pasadena Civic Center National Register Historic District.

As such a plan has not yet been recommended by City Planning Staff, the Pasadena CCC asks the City Council: (1) not certify the FEIR; (2) not make the findings

necessary to declare the City-owned public parklands along N. Garfield Avenue and Holly Street surplus property; (3) not make the findings necessary for a variance to permit the ground floor ceiling height be reduced to 9 feet from 15 feet; (4) not approve the Alternative 2A design study in Attachment N of the staff report; and (5) require revised environmental review for the Project. If the City Council does decide to move forward with the Project without further environmental review, we request you approve Alternative 2E identified in the DEIR as the preferred alternative for design study...

A. The EIR Fails to Satisfy the California Environmental Quality Act (CEQA).

1. The EIR Fails to Adequately Analyze Potential Impacts to the Pasadena Civic Center National Register Historic District.

The Pasadena Civic Center National Register Historic District (PCCNRD) is a significant historic resource that must be adequately documented, in its entirety, to determine its character defining features and any potential significant impacts.

The PCCNRD is described in the April 26, 1989 Nomination Form for the National Register of Historic Places. The Nomination Form provides great detail on the importance to the garden-like setting and the approach to the district:

Upon entering the district, one is aware that this is an important place in the city. Far less commercial and much more park-like, the Civic Center area is distinct from its surrounding neighborhoods both in architectural style and feeling. The streets are wider here, and lined with trees, the sidewalks are wider too; some of them paved in tile and brick set in decorative patterns. Small parks abound, planted with trees and flowers. Unlike other areas in the city, this section was planned *around the citizen, truly a place for people—to walk, to picnic and sunbathe, and to sit with friends among the trees and enjoy the open vistas.*

(Nomination Form: Continuation Sheet Significance Item Number 8 Page 2)

The Pasadena CCC submitted extensive comments on the DEIR regarding the need to fully analyze the impacts to the PCCNRD and identified the ways in which the Project, as proposed, would have a significant adverse impact. For example, the Pasadena CCC commented that the DEIR focused solely on the potential impacts on the YWCA building, but did not analyze the impacts *on the far more significant PCCNRD*. The FEIR continued to largely ignore the buildings of the PCCNRD, including City Hall, and its monuments, appurtenances, grounds, and approaches. It also failed to include a bona-fide identification and analysis of the character-defining features of the PCCNRD or a Cultural Landscape Report, which was requested by Pasadena CCC and the Design Commission due to the importance of the historic resources of the PCCNRD *as a whole*.

The FEIR also failed to provide substantial evidence for the conclusion that removal of the public parklands along Garfield Avenue and Holly Street is not a significant adverse impact under CEQA despite comments of Pasadena CCC indicating that their removal could trigger de-listing from the National Register of Historic Places. Instead, the City improperly segmented the consideration of impacts on landscaped space in the Civic Center, as discussed in section 5 below.

The FEIR failed to adequately address Pasadena CCC's comments, claiming the Project would not have significant adverse impacts on the PCCNRD. However, the FEIR lacks substantial evidence to support its conclusions that: (1) public parkland is not a character-defining feature of the PCCNRD; (2) the removal of the public parkland and scale of the newly-constructed hotel rooms would not adversely impact the PCCNRD and trigger de-listing of the PCCNRD from the National Register for Historic Places; (3) and these potential impacts on the PCCNRD are not significant adverse impacts that require disclosure, analysis, and mitigation under CEQA. Support for these claims must be included in the EIR. The response to comments included in Attachment O to the August 15, 2016 Staff Report do not add that required evidentiary support.

2. The Project Continues to Impact the Robinson Memorial.

The Pasadena CCC appreciates the City's recognition of the importance of the Robinson Memorial and that an additional condition of approval has been added in an attempt to address impacts to this resource. However, the Project would still significantly encroach upon the Robinson Memorial. The FEIR fails to provide substantial evidence for its conclusion that constructing a six-story hotel building on the public parklands along Garfield Avenue will not have significant adverse impacts to the Robinson Memorial.

3. The FEIR Fails to Adequately Analyze the Project's Inconsistencies with City Planning Documents and to Respond to Related Public Comments.

The FEIR fails to address or adequately respond to Pasadena CCC's specific comments regarding the City's land use and planning rules and regulations. Instead, the FEIR makes only general comments about consistency. The City's responses result in both a failure to adequately respond to comments and a failure to adequately disclose the project's impacts on land use.

a. Public Parks.

For example, the DEIR's land use analysis and the FEIR fail to provide satisfactory responses to Pasadena CCC's many questions about the project's consistency

with City policies encouraging the retention and increase in public park space:

- The FEIR does not answer how the removal of the parkland is consistent with any of the plans and policies discussed on pages 14 and 15 of Pasadena CCC Comment Letter, such as Pasadena's Green Space, Recreation and Parks Master Plan, which calls for additional public open space defined as: "...public outdoor spaces that cannot be classified as parks, but that fulfill many of the same functions as public parks. Public plazas, golf courses and the grounds of museums and historic sites are examples of this type of open space. Community gardens and *pocket parks* also fit into this classification." (emphasis added.) The FEIR fails to explain the City's claim that the parkland at Holly and Garfield cannot be defined, and function, as "pocket parks."
- The FEIR does not support the claim that the project is consistent with the Central District Specific Plan, District wide Urban Design Concept. The Public Realm – Section 6, p. 811 states, "because of limited Downtown parkland, there is a critical need to maximize the benefit of existing park resources, as well as explore opportunities for new park and recreational facilities." Because of this lack of park space, the Central District Specific Plan (CDSP) calls for the expansion of the open space network, "the provision of smaller-scaled urban outdoor spaces" in conjunction with public improvements and private development projects, allowing public access where feasible (CDSP p. 82) and the protection of mature street trees and other landscaped resources (CDSP p 149.) Also, the CDSP calls for the "presence of gracious landscape space" as one of the "defining qualities of the Civic Center/Midtown area" (CDSP p. 172) and "Courtyards, gardens and other landscaped areas should be embellished with year-round greenery and floral abundance." (CDSP p. 172). The project's removal of green space and replacement with large buildings is inconsistent with this concept. Thus, the FEIR's failure to explain how the removal of the parkland is consistent with the District Wide Urban Design Concept and the CDSP to maximize the benefit of existing park resources given the critical need and limited Downtown parkland presents a failure to adequately respond to comments.
- Pasadena CCC's comments expressed concerns about the project's consistency with Pasadena Municipal Code 4.17.040 Paragraph D. The City Council adopted an ordinance in December 15, 2014 that added "Pocket Park" to the definition of park that could be funded by the City's Residential Impact Fees. "Pocket Parks" are defined in this ordinance as small urban outdoor spaces, usually less than one acre in size, that are open to the general public. As Paragraph D states, "These public outdoor spaces may include amenities such as seating areas, plazas, rest areas, landmarks and public art installations, are typically in urbanized areas of the city, and primarily serve the immediate local population." The definition of

“Pocket Park” succinctly describes the nature of the “Civic Gardens or parks at Holly and Garfield and the tree-lined promenade north of the YWCA and south of the YMCA along Holly between N. Garfield and N. Marengo. The effect of having funding available for “Pocket Parks” is that this parkland can now be enhanced in a manner consistent with adopted plans (“*Design Development Plan for the Pasadena Civic Center/Mid-town District Design Project*, 2003 and 2007). The FEIR fails to explain how the proposed Project and removal of parkland is consistent with this recent legislative action.

CEQA requires disclosure, analysis, and mitigation of significant adverse impacts to land use, which occur when a project is inconsistent with a lead agency’s land use plans. Absent substantial evidence to the contrary, the project conflicts with City park policies.

b. Central District Specific Plan.

The FEIR does not respond to Pasadena CCC’s concerns about how the Project is consistent with *any* of the Central District Specific Plan (CDSP) policy statements cited on pages 17 – 20 of the Pasadena CCC Comment Letter and the Bennett Plan. Given that the Project would remove public parkland and that the Project would place new construction on almost 100 percent of Parcels 2 and 3, of scale and massing that overwhelms the YWCA, City Hall and all historical buildings and garden-like setting of the PCCNRD, consistency with the 84 policies, principles, and objectives, and Secretary of Interior’s Standards for Rehabilitation, referenced in the Pasadena CCC Comment Letter appears impossible. The FEIR must be revised to respond to consistency concerns regarding:

- “The Public Realm: An engaging public realm is important to the development of any great city. Pasadena’s residents also believe that their quality of life is related to the provision of accessible outdoor space that not only serves their recreation needs, but also finds a balance between built and natural resources. Building on the notion of a well-connected Downtown, this component describes a District-wide network of key pedestrian streets, public parks and civic spaces.” (CDSP p. 76.)
- “Downtown Linkages: Civic Heart: The Civic Center/Mid-town area is also one of Downtown’s principal activity nodes, additionally recognized as the symbolic center of the community. Highlighted by a collection of extraordinary civic landmarks sited in accordance with the historic Bennett Plan, this place should be highly accessible and communicate its status as the heart of the community. Public improvements that reinforce the significance and grandeur of the Bennett Plan’s axial arrangements are recommended.” (CDSP p. 77.)

- **Public Parks:** Because of limited Downtown parkland, there is a critical need to maximize the benefit of existing park resources, as well as explore opportunities for new park and recreational facilities.” (CDSP p. 81.)
- “Urban outdoor spaces may encompass a variety of types, including pocket parks, plazas, courtyards, gardens, and pedestrian passages. These spaces will often accommodate public access, especially when provided in conjunction with a non-residential project.” (CDSP p. 82.)
- “Precinct Character: Civic Center Core: This precinct in particular functions as the City’s symbolic and public center, and features a distinguished grouping of civic buildings that includes City Hall and the Central Library. The design of all buildings and public spaces in the precinct should reflect the highest quality, respect the prominence of civic landmark buildings, and reinforce the vision of the Bennett Plan” (CDSP p. 102.)
- **Sub-district Concept: Civic Center/Midtown: “City Beautiful Vision”:** Some of Pasadena’s most significant architectural treasures are found within the Civic Center/Midtown areas, particularly the complex of public buildings that includes the City Hall, the Central Library, and the Civic Auditorium. The setting for these buildings is no less important, and therefore, the realization of the 1920’s “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.” (CDSP p. 104.)
- “BD 1.3 Establish a harmonious transition between newer and older buildings; compatible design should respect the scale, massing and materials of adjacent buildings and landscape.” (CDSP p. 152.)
- “BD.2 Mitigate Massing and Bulk: Intent: Large monolithic buildings negate the qualities particular to the Central District. As their worst, these buildings make Downtown a less humane place. The proper consideration of the scale, massing and detail of the individual buildings will contribute to a coherent streetscape and satisfying public environment.” (CDSP p. 153.)
- **Section 10 Sub-district Guidelines Civic Center/Midtown Design Character**
“Guideline 3: Create Dignified Public Spaces: Distinguish this area by the presence of major public plazas and outdoor spaces suitable for public gatherings. These should include dignified spaces associated with public buildings and institutions.”
- **Guideline 1: “Provide a Gracious Landscape Setting: The presence of gracious**

landscape spaces is one of the defining qualities of the Civic Center/Midtown area. Significantly, these spaces exhibit a strong relationship and comfortable flow between interior and exterior space.” (CDSP p. 172.)

- Guideline 2: Embellish Outdoor Spaces: Courtyards, gardens and other landscape areas should be embellished with year-round greenery and floral abundance. These elements present a gracious quality and are evocative of the Tournament of Roses Parade.” (CDSP p. 172.)

If the EIR cannot be revised to provide evidence of the Project’s consistency with these policies, the project’s inconsistency with these policies would present a significant adverse impact on land use that the EIR fails to disclose, analyze, or mitigate.

c. Bennett Plan.

The FEIR discusses in great length its interpretation of the requirements of the 1923 and 1925 Bennett Plans and its comparisons of the two. However, neither the FEIR nor the City’s Staff Report for the July 13, 2016 Planning Commission meeting contain the meeting reports and minutes requested in the Pasadena CCC Comment Letter. These documents must be provided to demonstrate they support the City’s conclusion about consistency. The City claims it does not have copies of these reports and minutes; however, the City cannot be allowed to hide behind the failure to gather evidence to support its position. (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.) The City fails to provide a good faith, response response to this request.

d. Pasadena Zoning Code Section 17.30.040.

The General Development Standards for the Central District require that the first floor of all non-residential buildings in this District have a ceiling height of at least 15 feet. The Applicant’s request for a variance that would permit reduction of the first floor height cannot be supported by either the FEIR or the staff findings. Section 17.30.050 of the Pasadena Zoning Code sets out limited exceptions to the general development standards. While the Code provides for exceptions to other development standards (and provides requirements for granting these exceptions), *no exception is provided for any exception to the required minimum 15 foot first floor height*. The City cannot create an exception that does not exist in the Zoning Code. Additionally, since this type of exception has never been allowed before, it would set a precedent whereby other development would seek to skirt this requirement. This requirement is essential to a number of General Plan and Specific Plan principles directed at creating a pedestrian-friendly and engaging ground floor environment. A precedent for exceptions to this requirement would require CEQA review of the reasonably foreseeable impacts.

The FEIR states that the difference between the first-floor height of the hotel rooms and that of the contributing buildings would not result in a significant adverse impact because this difference in height does not result in any physical demolition, destruction, relocation or alteration of any portion of the Historic District. The FEIR also states that, due to exterior design, the floor height is not discernible. This reasoning is flawed because the first-floor height difference is not just a historic resources concern; is an aesthetic concern. Further, compliance with the City's rules and regulations are necessary to create a pedestrian-friendly environment consistent with the City's guiding land use plan. The City will not be able to make the findings to grant this variance, and it must be denied.

Regarding the first-floor height variance, the FEIR fails to adequately respond to the specific questions asked on page 9 of the Pasadena CCC Comment Letter, including:

1. Will the first floor height of the addition be compatible with the first floor height of the historic YWCA?
2. Are there other buildings within sight of the proposal that have such a short first floor?
3. Does this difference in first floor height have a negative effect on the Beaux Arts Bennett Plan?

Good faith responses to these questions are required. The FEIR must answer the questions above and support its conclusion, if possible, that the requested variance would not result in a significant adverse impact, especially when it conflicts with the Pasadena Zoning Code.

4. The City Must Either Select the Environmentally Superior Alternative or Adopt a Statement of Overriding Considerations.

The EIR identifies Alternative 2E as the environmentally superior alternative and concludes that it meets project objectives, retains and reuses the historic YWCA, and significantly reduces or eliminates overall project impacts. Most importantly, Alternative 2E reduces the loss of public parklands and approaches to the PCCNRD monumental buildings, including City Hall, which would eliminate the biggest, yet unacknowledged, impact of the Project. (A visual rendering of Alternative 2E is attached.)

While the FEIR concludes that it need not adopt the environmentally superior alternative, substantial evidence does not support the FEIR conclusion that the Project has no significant unavoidable adverse impacts. As discussed above and in Pasadena CCC's April 4, 2016 comments, the Project's removal of public parklands and the

massive scale of new construction will have a significant adverse impact on the PCCNRD. CEQA prohibits approval of projects with significant adverse environmental impacts if there are feasible alternatives or mitigation measures that would reduce or eliminate those impacts. (Pub. Resources Code § 21002; Guidelines § 15021(a)(2).) When an agency seeks to approve a project despite its significant unmitigated impacts on the environment, the agency must adopt a statement of overriding considerations. (Pub. Resources Code § 21081.) Until the EIR adequately supports its flawed conclusion that the project will not have significant adverse impacts on historic resources, the City must either choose the environmentally superior alternative, or adopt a statement of overriding considerations. (Pub. Resources Code § 21081.)

A statement of overriding considerations must include two specific findings, supported by substantial evidence. The first finding that must be made is that “There is no feasible way to lessen or avoid the significant effect...” of the project. (Guidelines §§ 15043, 15093(b).) The second finding is that the project’s benefits outweigh its significant adverse environmental impacts. (Guidelines § 15093(a).) These findings must both be supported by substantial evidence. (Guidelines § 15093(a)-(b).)

Contrary to the City assertion that the YWCA/Kimpton Hotel Project was not selected based on economics, evidence suggests economics was the *only* reason the Kimpton Hotels and Restaurants, LLC was selected as the private hotel developer and operator. Arguably, the only reason to not choose the environmentally superior alternative is due to financial considerations, which the draft EIR alludes to as having “less operational capacity.” Here, if the City chooses to not select the environmentally superior alternative, it must disclose its reasons and support them with legal, economic and financial data and analysis, and other relevant documentation. The August 15, 2016 Staff Report does include a two page document entitled “Financial Analysis of the Project.” This document fails to provide the underlying assumptions it is relying upon regarding the project construction, financing and operations that are necessary to support its conclusions, nor does it provide assumptions and analysis of the impact of other existing and planned hotels on the projected financial benefits from the Project.

Additionally, Pasadena CCC notes that the Urban Forests Advisory Committee continued its hearing on the proposal to removal any public or private trees, and recommended the City consider an alternative to the Project that would limit tree removal and encroachment into the public parkland. The environmentally superior Alternative 2E would do just that.

5. The City is Segmenting/Piecemealing the Project in Violation of CEQA.

During meetings convened and led by the Applicant’s attorney, looking at design

for the Project, the issue of landscaped space and symmetry became an important topic of discussion. These discussions made it clear that any encroachment by the Project into the public open space in Parcel 3 would leave the rest of the Civic Center in an "unbalanced" and non-symmetrical condition where buildings were no longer following a Beaus-Arts "axial" relationship. Instead of addressing this issue in the environmental review process for the Project, the City has improperly segmented consideration of impacts to a later time by a Planning Commission Subcommittee for Civic Center Undeveloped Landscaped Space and Symmetry of Future New Construction on Holly Street. As the analysis of undeveloped landscaped space and what to construct upon it directly implicates the project, the City's environmental review of this item separate from the project violates CEQA. CEQA prohibits a public agency from "subdivide[ing] a single project into smaller individual subprojects in order to avoid the responsibility of considering the environmental impact of the project as a whole." (*Orinda Assn v Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1171.)

The Planning Commission had agendized this item for consideration at the July 13, 2016 meeting, but then continued the item until after the City Council determination on the Project. CEQA requires consideration of these projects, together, in a single environmental review process.

Moreover, the formation of this Planning Commission subcommittee supports Pasadena CCC's claim that the Project will have significant and adverse impacts on the City due to the removal of public parklands and open space. Based on the City's admission that these impacts are significant enough to require a separate public process to provide mitigation, the project's impacts to parklands and due to the reduction in open space must be disclosed, analyzed as significant impacts, and mitigated or avoided to the extent feasible.

B. The City Has Not Complied with Other Local and State Requirements.

1. Exclusive Negotiation Agreement.

The Pasadena CCC DEIR comments raised concerns about the City's public process for choosing the Applicant for this Project. The FEIR fails to respond to these comments, including, but not limited to:

- How was the Applicant chosen and why? Who were the other applicants, what were their design solutions and why were they rejected?
- Is there documentation of the Exclusive Negotiating Agreement (ENA) extensions and why is it now further extended to January 17?

- If the City has a direct financial interest in the proposed Project given that it owns the land and the building and will receive compensation for some sort of lease agreement, how can the city separate its role as a regulator and decision maker from its financial interest? Does the ENA define the City's financial interest in the Project? Does that interest vary depending on the number of rooms and design of the Project?
- The City as landlord and as the recipient of transient occupancy tax and property taxes has a financial interest in defining an "Operational Capacity" in a manner that maximizes its financial interest. An independent, third party analysis must be made and the financial assumptions and details must be made public.

Instead of answering these questions, the FEIR states only that because the Project creates no significant unavoidable impacts, the FEIR does not need to disclose financial details, including the terms and conditions of the ENA. Whether the Project's environmental impacts are significant is irrelevant to the City's disclosure of public documents. The document is disclosable pursuant to the California Public Records Act and must be provided. The responses attached to the August 15, 2016 Staff Report fail to provide this document or a legally valid basis for the City's failure to disclose it.

2. Declaration of Surplus Property.

The City has not complied with State and City regulations regarding disposition of surplus property, nor has it provided support for its findings.

The Pasadena Municipal Code defines "surplus real property" as "real property of the city not needed for the purpose for which it was acquired *or for any other public purpose.*" (Pasadena Municipal Code, Title 4.02.010 A, emphasis added.) The City's findings originally addressed only whether Parcel 3 (the public parkland) is needed for the purpose for which it was *acquired*, i.e. "part of the development of the Civic Center, specifically City Hall and its appurtenances, grounds and approaches." First neither the City nor the FEIR have provided substantial evidence that this parkland is not needed for "City Hall and its appurtenances, grounds and approaches."

Additionally, despite an acknowledgement in the August 15, 2016 Staff Report that other public purposes must be considered before Parcel 3 can be deemed surplus property, the Staff Report and findings still fail to consider *any other public purpose* for which Parcel 3 could be used. Instead, the Staff Report just states the declaration of surplus property is required to allow hotel development. As discussed above and in Pasadena CCC's previous comments, there is inadequate evidence to support a claim that Parcel 3 is required for development of a hotel project. Moreover, that is not the standard set out. The City must consider whether there are any other *public* purposes for which this public land could be used.

Also, according to City staff, the City has no precedent where public parkland has been declared surplus property. The Pasadena CCC asks that prior to approval of any project at this site, additional information be provided to the public regarding how the City supports its findings that all three project parcels are not needed for either the purpose for which they were acquired in 1923 and/or for any other public purpose.

The Municipal Code also provides that a sale of surplus real property may only occur if "it has made special findings, after public hearing, that an extraordinary and overriding public benefit will be achieved. Such public benefit may relate to the provision of public parking, low-cost housing, a public service facility, or a museum or other cultural or artistic institution, or the economic and public well being of other properties in the immediate vicinity." (Pasadena Municipal Code, Title 4.02.03 A.)


The City has not and cannot make the necessary findings. In finding that the Project is exempt from the competitive bid requirements, the City has not provided evidentiary support for claims that the project (1) would have an extraordinary and overriding public benefit related to the economic and public well-being of other properties; and/or (2) is necessary to cause the rehabilitation of the YWCA building. The City has also failed to discuss the declaration of the property as "surplus" in a public hearing. While the City provided some limited financial information for the first time just days before the City Council hearing, this information lacks foundational support and provides no analysis of the economic benefits of property other than the hotel Project.

The City has also failed to comply with the State Surplus Land Act because it failed to offer Parcel 3 for park and open space uses prior to disposal of the property. Government Code section 54420 subd. (b) provides, "there is an identifiable deficiency in the amount of land available for recreational purposes and that surplus land, prior to disposition, should be made available for park and recreation purposes or for open-space purposes."

Conclusion

Thank you for your consideration of these comments. The Pasadena CCC urges the City Council to uphold the City's goals and objectives outlined in the General Plan, Central District Specific Plan, and other relevant plans and policies related to historic resources, parks and open space. Compliance with CEQA requires further documentation and analysis of the entire PCCNRD in the EIR, and of the need for public parkland and open space in the Civic Center to truly assess project impacts and provide the good-faith effort at full disclosure required by CEQA.

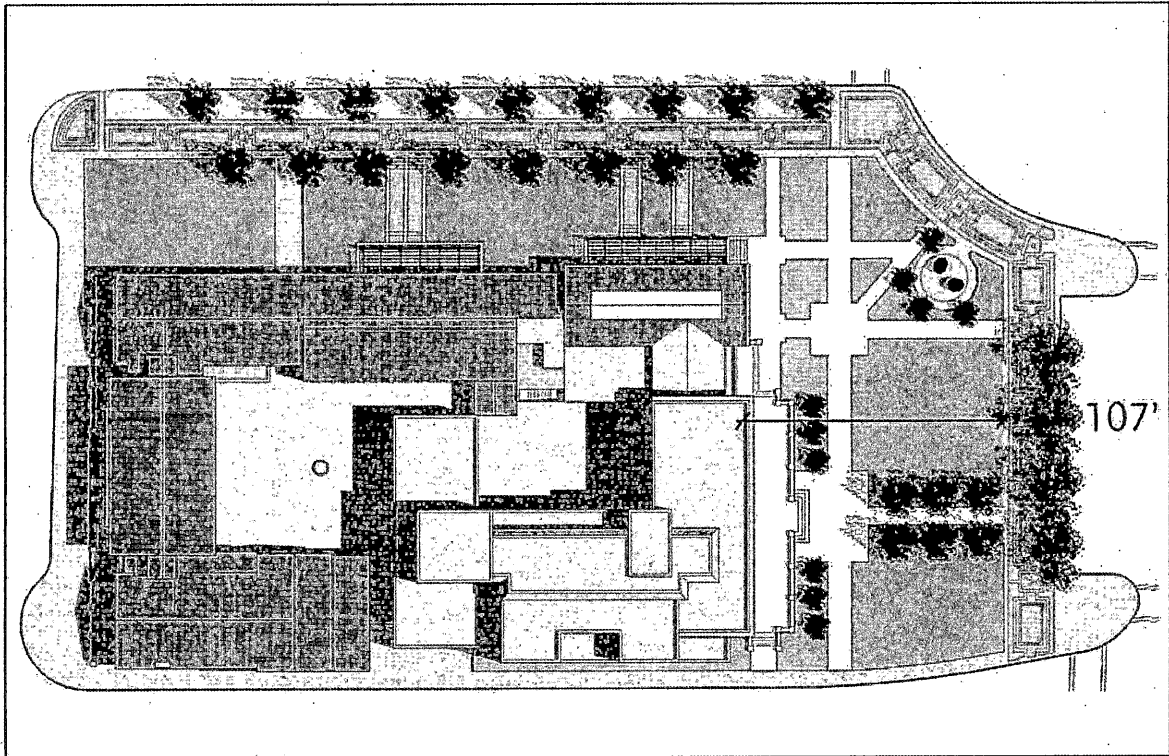
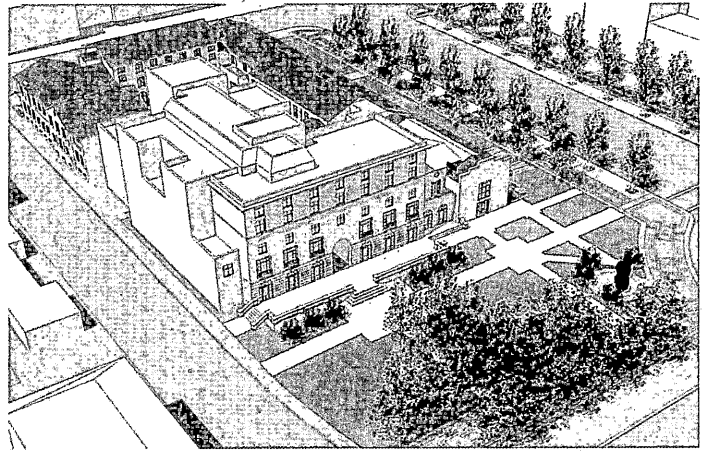
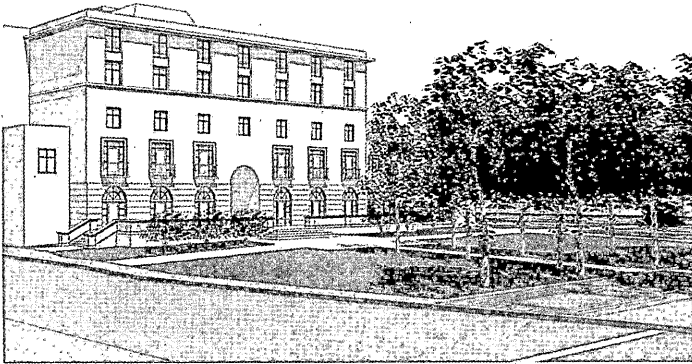
Sincerely,


Amy C. Minter, on behalf of
Pasadena CCC

cc: Pasadena Design Commissioners, cburciag@cityofpasadena.net
Pasadena Historic Preservation Commissioners, cburciag@cityofpasadena.net
Kevin Johnson, Senior Planner, rkevinjohnson@cityofpasadena.net
Steve, Mermell, Pasadena City Manager, smermell@cityofpasadena.net
David Reyes, Pasadena Planning Director, davidreyes@cityofpasadena.net
Mark Jomsky, City Clerk, mjomsky@cityofpasadena.net

Alternative 2E

Preserves parkland, preserves all Sister City Trees, presents a better 'face' to City Hall.
The "Environmentally Superior" alternative.



Note: Setback distances are approximate.
Source: Maula & Palyzoides, 2015



Figure 4-11
Alternative 2E - 107 Foot Setback with No Increased Height and Reduced Room Count
YWCA Kimpton Hotel Project Draft EIR



Novelo, Lilia

Subject: FW: Comments on YWCA-Kimpton for City Council
Attachments: PH_coloremail.sig.jpg; ATT00001.htm; PH - City Council YWCA Kimpton 8-11-16.pdf; ATT00002.htm

From: Sue Mossman <smossman@pasadenaheritage.org>
Date: August 12, 2016 at 5:02:43 PM PDT
To: "Jomsky, Mark" <mjomsky@cityofpasadena.net>
Subject: Comments on YWCA-Kimpton for City Council

Dear Mark - attached is our comment letter for Monday night's hearing.
I will also send individually to each council member in hopes they might see and read it over the weekend, but please also distribute as you generally do.
Many thanks!
Sue

Susan N. Mossman
Executive Director

08/15/2016
Item 10



**PASADENA
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July 11, 2016

Mayor Tornek and Members of the City Council
City Of Pasadena
100 N. Garfield Avenue
Pasadena, CA 91101

VIA EMAIL

Certification of the YWCA/Kimpton Hotel Final EIR and Support for Alternative 2A

Dear Mayor Tornek and Council Members:

The historic YWCA building has sat vacant for nearly 20 years. Today, its possible reuse offers a rare and much needed opportunity not only to bring that building back to productive use but also to reactivate and enhance our iconic Civic Center. Pasadena Heritage's goals for a project in the Civic Center that includes the former YWCA building have remained the same over more than four years. An acceptable project would:

Rehabilitate and restore the former YWCA and return it to productive use.

Respect the Bennett Plan and conform to the intent and drawings of the plan.

Be a project of the highest quality that is an asset to the Civic Center, a worthy companion to City Hall across the street, and compatible with the former YWCA.

A use that will enliven and activate the Civic Center as a whole.

We believe that the proposed hotel project can meet these goals. **Pasadena Heritage supports Alternative 2A with modifications as conceptually illustrated in Attachment N to better address design and massing issues.**

We find that the FEIR is adequate and provides the information necessary for sound decision-making purposes. We support its certification.

Pasadena Heritage has continually worked to encourage the best possible project concept that would achieve a successful outcome. The rehabilitation of the historic YWCA site has the potential to positively transform more than just the building's outer walls. Pasadena Heritage, with nearly four decades of interest, concern, advocacy, and first-hand knowledge, has diligently participated in the process to bring back this vacant and neglected property and return it to productive and positive use. We reviewed the RFP documents, organized public information sessions and tours of the existing building early on, reviewed and commented on the project through numerous iterations, and participated in every Commission and Council hearing on the project. Pasadena Heritage attended all the community working group sessions led by Stefanos Polyzoides aimed at developing EIR alternatives. We also attended multiple meetings with the developer and design team and with city staff to discuss and make recommendations to improve the project. The process has been long and arduous, but we believe the project has improved significantly through public participation. The time has come to make a decision.

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We ask that you please consider the following additional specific comments:

Comments on Alternative 2A with Modifications and Conditions

Pasadena Heritage agrees with Staff that Alternative 2A is most appropriate due to its reinforcement of the 1925 Civic Center plan designed by Bennett, Parsons, and Frost, and its relationship to City Hall and Centennial Plaza. **Specifically, we support and ask the Council to approve the revised 2A alternative (Attachment N)** that includes modifications to better address the heights of Union Street frontages. This more thoughtful articulation of massing along Union will improve how the new hotel wing transitions from the modest height of the YWCA to the monumental civic architecture of City Hall in a manner consistent with the urban character of the district. Further development of this concept is and should be the purview of the Design Commission.

Another strength of the 2A design is its **diagonal face to City Hall at the intersection of Garfield and Holly**, reflecting the Bennett Plan drawings. This design introduces a formal and welcoming public entrance at this key intersection with Centennial Plaza and a still gracious landscaped space in front of a subordinate building – a quality place-making gesture with strong linkages to the existing historic architectural vocabulary and public circulation in the District.

Regarding room count, there have been conflicting references to the number of hotel rooms in the many documents circulated during the review process. **Pasadena Heritage asks that all approval documents in their final form state a maximum of 180 rooms rather than 185 rooms.** Although the number of rooms is not the best measure of the size of the project, we believe a lower number of rooms (180 vs. 185) sets one critical boundary to the size or density of the project.

Findings and Conditions for CUP #6279, other CUPs and Variances

Pasadena Heritage finds the surplus property declaration appropriate for the purposes of historic YWCA's rehabilitation as well as exemption of the lease from the competitive sale requirement. The project was the subject of an open RFP process, so a variety of proposals and developers were invited and considered. The fact that the City will continue to own the land provides the City, and thus the community, with ongoing controls.

We support the other requested CUPs and variances with one modification:

Pasadena Heritage asks that the variance (Item 3h) requested for ground-floor ceiling height be modified to state that the required ceiling height of the new construction remain at the required 15 - 19 feet in the angled entrance pavilion portion of the building facing Centennial Plaza and City Hall at Holly and Garfield. This will be a primary entry point and the one often used by the public. This should be a welcoming space of grand proportions, in keeping with the civic nature of its location. This code requirement is rooted in a sophisticated understanding of features that define quality public spaces. The new construction, in this most sensitive setting, must intentionally reflect the monumental character of City Hall. We ask that you stipulate that the floor-to-ceiling height in this portion of the project conform to the 15-19 ft. required ceiling height. In other areas, more flexibility and a reduced ceiling height can be mitigated through good design.

We support the plan for a new Sister City Garden with renewed prominence and a formal design combined with the proposed Lot Line Adjustment and **careful consideration of the Robinson Memorial.** The proposed project alternative 2A now includes a thoughtful and

appropriate solution that balances these important contributors to the Civic Center with better defined and beautified open space and the careful siting of a new hotel wing.

Pasadena Heritage asks the Council to support creating additional landscape areas in the parking areas along Garfield Avenue. This would add green space back to the Civic Center, additionally buffer the hotel from cars, better direct and control traffic circulation around Centennial Plaza, and be a definite public improvement. We ask that this concept, first suggested by Pasadena Heritage and shown in various iterations of the project along the way, become part of the approved plan.

The Design Commission (Condition 13) holds the authority to review and approve design details and questions of contextual compatibility and compliance with the Secretary of the Interior's Standards for Rehabilitation. We ask that the Design Commission be given the maximum flexibility possible to work with the design team on the many challenges this project presents.

In conclusion, Pasadena Heritage continues to believe that a hotel project incorporating the former YWCA building is appropriate for the Civic Center and has much to offer the community. This project could augment the character of the area by saving an important historic resource, creating a supportive mix of uses, breathing new life into a vacant lot, and demonstrating our City's commitment to its iconic public architecture and landscape.

The Pasadena Heritage Board of Directors joins me in thanking you for your consideration of our comments in your review of this most important project.

Sincerely yours,

(signed)

Susan N. Mossman

Executive Director