



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Acting Director  
5796 Corporate Avenue  
Cypress, California 90630

19 APR 29 12:11 PM  
CITY CLERK



**Gavin Newsom**  
Governor

April 26, 2019

Mayor Terry Tornek  
City of Pasadena  
100 North Garfield Avenue  
Pasadena, California 91109

Dear Mayor Tornek:

Thank you for your recent letter requesting an extension to the public comment period for the proposed Removal Action Work Plan (RAW) for the Space Bank Mini-Storage Facility located at 3200 East Foothill Boulevard, Pasadena (Site).

Based on data gathered during the remedial investigation, and an analysis of the former operations at the Site, the Department of Toxic Substances Control (DTSC) believes that all chemicals of concern have been adequately identified. At this time, new information that would change or modify those conclusions has not been presented.

Although a public comment period for a RAW is not requirement, DTSC recognizes the importance of providing the opportunity for comment when there is community interest, and DTSC's practice is to provide a 30-day period. Please note that DTSC is providing a second and final extension to the public comment period until May 14, 2019. The 69-day (including the 39-day extension) public comment period provides the community with additional time for review and comment.

DTSC is committed to responding to all comments received during the review period and will be responding in writing to all those who have provided written comments. After careful evaluation and consideration of all comments, DTSC will render its final determination regarding approval of the RAW.

Mr. Terry Tornek, Mayor  
April 26, 2019  
Page 2 of 2

Thank you again for taking an interest in the project. DTSC is available to meet with you or your staff to answer any questions you may have, or if you would like additional background information on the project. Please contact me at [robert.senga@dtsc.ca.gov](mailto:robert.senga@dtsc.ca.gov) or (714) 484-5436 if you would like to arrange for a meeting, or to discuss the project.

Respectfully,



Robert M. Senga  
Acting Branch Chief  
Site Mitigation and Restoration Program, Cypress  
Department of Toxic Substances Control

# Trammell Crow Company

CITY CLERK  
19 APR 29 12:14 PM

## Vis Email and Hand Delivery

April 29, 2019

The Honorable City Council of  
the City of Pasadena  
City Hall, 100 Garfield Ave  
Pasadena, California 91101

Re: 3200 E. Foothill Boulevard/Item No. 14 on the Council's April 29 Agenda

Dear Councilmembers:

I am the Environmental Manager for Trammell Crow Company/High Street Residential, which has voluntarily and contractually committed to fully and safely clean up the above site so that there will be no health or safety risks to our future residents or the larger community. I hold a Master of Science degree in Environmental Science, and I am a Certified Hazardous Materials Manager at the Master Level. I have been employed in the environmental field for more than 35-years, during which time I have evaluated and remediated scores of contaminated Brownfield properties, including roughly a dozen Superfund sites, all of which were successfully and safely redeveloped into productive developments bringing local jobs, homes, businesses, and tax revenues to the benefit of the communities they were respectively located in. The majority of the properties I have successfully remediated have been in Southern California communities.

Since 2007, I have been spearheading our company's efforts to evaluate and clean up the existing contamination on the Space Bank site resulting from the US Navy's former use, to the highest applicable standards for the future planned residential community. In that role, I have worked closely with our team of hazardous materials testing and remediation experts at Ninyo & Moore, who have in their own right helped to successfully clean up scores of brownfield sites across the nation. I have a long track record of success in remediating sites with the State Department of Toxic Substances Control (DTSC), who will approve the Removal Action Workplan ("RAW") and oversee the cleanup effort. I am very familiar with the site, its history, the extent and types of existing contamination, and the RAW. I am writing to address certain misleading assertions made regarding the site, the RAW, and Trammell Crow Company's and DTSC's commitment to clean up the site in an open and transparent process

1. There has been No New Information Presented that Undermines the Conclusions of the SCEA or the Effectiveness of the RAW. Prior to approving the project, the City Council adopted a comprehensive Sustainable Communities Environmental Assessment (SCEA) that was prepared and approved by City Staff and their third-party consultant team of experts. The SCEA included voluminous information on the site's environmental conditions, as well as the proposed method of clean up for the site. The SCEA also included detailed information about the RAW (see pp. 10-15 and 120-121, attached at Exhibit 1 to this letter), as well as a detailed description of the proposed remediation approach and techniques (see pp. 14-15). All of the information included in the SCEA, including the remediation approach and techniques, is consistent with the RAW published by DTSC.

Some commenters maintain that there is new information that undermines the conclusions of the SCEA and the effectiveness of the RAW. As explained below, **none** of the comments include evidence that the SCEA was inaccurate or that the RAW will not be fully effective. **While we appreciate the commenter's concerns, none of their arguments are based on fact, but only speculation, conjecture, and a misunderstanding of the information available now and before the City Council when you approved the project last summer.**

2. The Site Will Be Fully Cleaned Up. Commenters have claimed that the RAW states that the site will only be partially cleaned up, that carcinogens will remain in place, and that it is "unknown" whether the cleanup will protect future residents. **The RAW does not state any of this.** In fact, the RAW provides that all of the impacted soils and infrastructure present at the site must be removed under supervision of DTSC to residential use standards. Following this removal, the site will be re-tested and a health risk assessment will be conducted, all under DTSC supervision, to confirm that the site is safe for the planned residential use. If there is any residual health risk remaining from soil vapor potentially emanating into the proposed buildings, the DTSC will require vapor intrusion barriers or other necessary measures to fully mitigate this risk, as is detailed in the RAW.

Nor does the RAW state that DTSC is allowing a partial cleanup to save the developer money. The RAW clearly states all of the impacted soils and infrastructure at the site must be removed under DTSC oversight without regard to cost.

One commenter has cited pages 4 and 8, (of 20) of the Response to DTSC Comments on the Remedial Investigation/Feasibility Study (RI/FS) report (Appendix A to Nino & Moore's RI/FS report November 3, 2017) and Page 31 of the RAW to support the above assertions. I have attached as Exhibit 2 copies of these pages; they clearly do not in any way support the commenter's allegations.

3. The Project Cannot Be Constructed Unless and Until the Site is Fully Remediated. One commenter asserts that the RAW states that cleanup activities will occur after completion of the project and that residents will be exposed to contaminants for over one year. In fact, the site must be fully cleaned up to the applicable residential standards for its intended use, with confirmation testing, **before** DTSC will allow new project construction to even begin.

The commenter maintains that pages 47 and 50 of the RAW (copies attached as Exhibit 3) support the above assertion. As shown on the attached pages, the commenter apparently confuses Alternative 1, the "No Action Alternative," (i.e., doing nothing and leaving the contaminants in place) with the preferred and selected Alternative 2, which will remove the containments of concern (COCs) and fully address soil vapors well in advance of project occupancy. DTSC has approved and will require us to implement Alternative 2.

4. DTSC Found that the Project Would Not Result in Significant Impacts, so a Statement of Overriding Considerations is not Required or Appropriate. Contrary to one commenter's allegations, DTSC's draft CEQA findings do not state that the project would result in significant health risks, and DTSC did not find that the project's economic benefits outweigh these risks. On the contrary, DTSC found that with mitigation, **all of the project's potential environmental impacts, including potential health and safety risks, would be less than significant.** Although DTSC's standard CEQA findings form includes a box to check when there are significant impacts, the CEQA findings (relevant portions attached as Exhibit 4) clearly show that DTSC **did not check this box.** While DTSC appears to have inadvertently checked the box indicating that a statement of overriding considerations would be adopted, such a statement is not

required or appropriate as the project will not result in any significant impacts. Public Resources Code Section 20181(b). This inadvertent error will be corrected in the final CEQA finding adopted by the DTSC relative to the RAW.

5. All Contaminants Likely to Occur On-site Were Fully Investigated. The site has been extensively investigated and tested for over 20 years, including 15 environmental studies and hazardous material investigations conducted by eight different qualified experts that collectively have included 382 soil samples and 157 soil gas samples. These extensive studies and testing, which have been carefully reviewed by DTSC, fully identified all COCs at the site.

a. There is No Evidence of RDX or TNT. Contrary to certain assertions, the historic record does not indicate that the site is contaminated with RDX and TNT. Nor is there any evidence that these compounds (which are explosives that are used in warheads) were used onsite. The site was a ***research and development facility for prototype fabrication and delivery testing – propulsion, pressure, and guidance testing***. Based on the historic record, the facility did not test torpedoes or missiles with warheads containing explosives or include a weapon testing range. Nonetheless, as part of the cleanup DTSC has indicated they will require testing for these compounds as an additional confirmation that they are not present.

b. There is No Evidence of Contamination by PFAs. Contrary to certain claims, the site was never used to conduct research on or test firefighting foam with perfluoroalkyls (PFAs). A commenter maintains that because one of the many investigative reports on the site referenced that the Navy conducted research on “fire control,” the Navy must have tested firefighting foam with PFAs at the site. In fact, the Navy researched the fire control ***of weapons*** (i.e., of targeting and firing of weapons), not firefighting foams or techniques. The commenter provides no evidence of high concentrations of PFAs on the site, but only conjecture and speculation based on general information or information specific to other military sites unrelated to this facility. While PFAs are present in a wide variety of materials and widespread throughout the environment, there is no evidence that there are unusual concentrations at the site. Moreover, PFAs are not currently regulated on a state or national level.

c. There is No Evidence of Radiation. The Navy did not test nuclear warheads at the site. Moreover, a radiation survey conducted by a qualified environmental consultant found no abnormal radiation levels.

6. The Possible Recordation of Land Use Covenants Will Not Reduce the Developer’s Obligation to Clean the Site Up. A commenter alleges that the DTSC will allow the developer to record land use covenants on the site in lieu of a thorough cleanup. As noted, the RAW requires the thorough cleanup of the site prior to development of the project. Land use covenants are frequently used to close sites that have residual contamination with no exposure pathway to harm site occupants, the public at large, or the environment. In this case, land use covenants would only be recorded if a vapor intrusion mitigation system becomes necessary (DTSC will decide this based soil vapor data to be collected post-remediation) to ensure continued operation and maintenance of that system. No corners will be cut, and any such covenants will not reduce our contractual obligations, nor would such a covenant result in any left-behind contamination that poses a risk to human health or the environment.

7. The Entire Site has been Appropriately Tested. Commenters assert that only a portion of the site has been tested for COCs. On the contrary, a workplan for further site investigation was produced in 2007 and was reviewed and approved by DTSC. After reviewing this data, DTSC specifically requesting

additional sampling and analytical testing to ensure that there were no “data gaps.” In other words, DTSC required the site to be “holistically” evaluated. The results of this holistic testing were presented in the Remedial Investigation/Feasibility Study (RI/FS) report approved by DTSC in 2017.

8. DTSC Does Not Consider the Site to be an Imminent and Substantial Danger. Commenters claim that DTSC considers the site to be an imminent and substantial danger. As set forth at pages 8 and 9 of the Environmental Summary Report dated May 22, 2007 by Kennedy/Jenks (see Exhibit 5), almost 15 years ago DTSC issued an order to compel the U.S. Army Corps of Engineers (USACE), which was involved with the site because it was formerly a U.S. Navy facility, to enter into negotiations to clean up the site:

As a consequence of USACE’s reluctance to further investigate or remediate the Site, DTSC issued an Imminent and Substantial Endangerment Determination and Remedial Action Order (Order) on 2 December 2004 ... ***On 13 November 2006, DTSC revoked the Order and entered into a formal dispute resolution process with the USACE.*** (Emphasis added.) A copy of the November 13, 2006 DTSC letter has been included in Exhibit 5.

DTSC has not issued such an order since. At its recent public meeting on the RAW, DTSC stated:

***The site is safe at this time.*** Contamination is below paved surfaces and confined. (Emphasis added.)

9. DTSC Properly Concluded that Groundwater Did Not Need to be Tested for the Site to be Remediated and Redeveloped. COCs present on the site are primarily located in shallow soils and in soil vapor. Soil borings onsite were conducted to a depth of 150 feet and did not encounter groundwater. The closest groundwater well to the site (Jourdan well), which is located approximately 1/8 mile to the southwest, had a measured depth to groundwater of approximately 333 feet. Given the depth to groundwater, the project does not have, nor would it create a pathway for humans to be exposed to groundwater, contaminated or otherwise. Therefore, testing of groundwater was not necessary to render the site safe for residential occupancy. However, as a component and obligation of the RAW, four groundwater monitoring wells will be installed, and groundwater sampling conducted to ascertain if groundwater has been impacted by the former U.S. Navy operations at the site. If this monitoring shows that the groundwater is in fact impacted, DTSC will use that data to hold the U.S. Navy responsible for any response actions that are necessary.

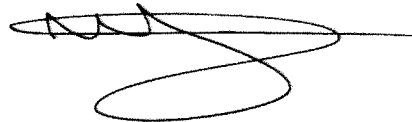
10. There Was No Fraudulent Testing. Commenters maintain that the studies supporting the RAW are flawed because they include information gathered by two consultants, Tetra Tech and Science Applications International Corporation (SAIC), which they allege committed testing fraud on other sites and insinuate committed fraud on this site. However, these firms only had very small roles on the site. Tetra Tech was retained by the Los Angeles Metropolitan Transit Authority (LAMTA) in 1994 to perform a Phase I Environmental Assessment (EA) and after the EA a workplan for site investigation. Both documents were “desktop” type studies (i.e., research of existing documentation), and neither included the collection of any physical samples. SAIC performed three studies on behalf of USACE in the early 2000’s time frame. Two of these were studies relative to the storm drain system and a third was a site investigation that was produced in draft form, but apparently never finalized. In any event, Ninyo & Moore, a well-respected and widely recognized environmental consulting firm that prepared the draft RAW, and the DTSC independently vetted all relevant data to ensure their accuracy. Therefore, both the SCEA and the RAW are based exclusively on accurate data.

11. The Data Supporting the RAW has been Appropriately Validated. One commenter alleges that testing data was not properly validated. In fact, data validation was a required component of the RI/FS performed by Nino & Moore. The data validation memorandum demonstrates that all key historic data meets the stringent Level 2 Data Validation requirements set forth by DTSC.

The Trammell Crow Company remains committed to cleaning up the Space Bank property (which we did not pollute) at our cost and expense to the highest applicable standards in an open and transparent process to ensure the long-term safety of the residents of the Pasadena community. We are also looking forward to working with the City's third party consultant being retained by the City to conduct peer review before, during, and after construction to (a) ensure that DTSC receives all the City's and the public's comments and responds fully these comments, and (b) conduct a comprehensive review of the cleanup to ensure that we are complying with all requirements of the RAW and the SCEA and protecting the community and future project residents.

I am available to provide any further information that you may request.

Very truly yours,  
**TRAMMELL CROW COMPANY**



Neal H. Holdridge  
Principal / Environmental Manager  
3501 Jamboree Road, Suite 230  
Newport Beach, CA 92660  
(949) 477-4719

Cc: Steve Merrill, City Manager  
David Reyes, Planning & Community Development Director  
Michele Beal Bagneris, Esq., City Attorney

## Exhibit 1



private construction contractor who provides short-haul trucking services and uses the area for vehicle parking.

Figure 3 shows the proposed site plan and Figure 5a and Figure 5b show the proposed land use and landscape plans. Figure 6a through Figure 6e provide simulations of the proposed development compared to existing on-site conditions. The project's proposed development statistics would comply with the allowed density, gross floor area, and floor-to-area ratio (FAR) permitted by the City of Pasadena General Plan Land Use Element. The Land Use Element allows an FAR of 2.25:1 and the proposed project would have an FAR of 1.53:1. However, the project would exceed the maximum allowed gross floor area and FAR of the East Pasadena Specific Plan (1.20:1).

### Construction<sup>1</sup>

Construction operations are planned to begin in May 2019 and end by March 2022. Construction will occur in the following phases:

- Site remediation: May 2019 – July 2019
- Grading: August 2019 - September 2019
- Construction: October 2019 - March 2022

The estimated project occupancy date is April 2022.

### Remedial Activities

Historical use of the project site for research, testing, and assembly of torpedoes and other weapon systems has generated the presence of hazardous materials in soil and soil vapor, and potentially in groundwater beneath the property. Numerous environmental site assessments have been conducted of the site by various consultants and have been documented in the following reports:

- *Memorandum, Defense Environmental Restoration Program (DERP) Report for Army Corps of Engineers, Formerly Used Defense Sites (FUDS) Site No. J09CA105200, December 1992-April 1994*, prepared by Wheeler and Gray
- *Space Bank, Ltd, Phase I Environmental Assessment Final Report, February 10, 1994*, prepared by Tetra Tech, Inc.
- *UST Closure Report, Removal and Disposal of One 2,000-Gallon and Two 200-Gallon Underground Storage Tanks, NIRF Under Sea Center, October 2, 1998*, prepared for US Army Corps of Engineers, prepared by Maness Corporation
- *Draft Site Investigation Report, NIRF Under Sea Center Site Inspection, Pasadena, California, DERP-FUDS Project Number J09CA105200, June, 1999*, prepared by US Army Corps of Engineers
- *Phase I Environmental Site Assessment Report, Space Bank, Ltd., June 21, 1999*, prepared by ATC Associates, Inc.

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<sup>1</sup> The project's construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), which is provided in Appendix C. The timeline for construction used in CalEEMod is based on an earlier estimate that would begin in October 2018 and end by July 2021. This section provides a revised timeline; however, the overall timeframe would remain at approximately 34 to 35 months. Therefore, this revision would not alter the significance determinations provided for the analyses that are based CalEEMod calculations, which include: Section 2, *Air Quality*, Section 6, *Energy*, Section 8, *Greenhouse Gas Emissions*, Section 13, *Noise*, and Section 19, *Utilities and Service Systems*.

- *Draft Site Investigation Report and Site Assessment, NIRF Undersea Center, Pasadena, California, prepared for US Army Corps of Engineers, Los Angeles District, July 12, 2002, prepared by Science Applications International Corporation (SAIC)*
- *Final Report, Nonpoint Source Pollution of the Stormwater Drainage System, Naval Information Research Foundation, Undersea Center (AKA NOTS Pasadena), Prepared for US Army Corps of Engineers, December, 2003, prepared by SAIC*
- *Draft Final Preliminary Endangerment Assessment (PEA) Report, NIRF Undersea Center, Pasadena, California, August 2005, US Army Corps of Engineers (ACE), Los Angeles District, prepared by Enviroguide*
- *Expedited Phase 2 Environmental Site Assessment Report, Space Bank Mini Storage, February 1, 2006, prepared by SECOR International, Incorporated*
- *Expedited Phase I Environmental Site Assessment Report, Space Bank Mini Storage, March 30, 2006, prepared by SECOR International, Incorporated*
- *Final Focused Site Investigation, Naval Information Research Foundation (NIRF), Undersea Center, Pasadena, California, November 2006, prepared for US Army Corps of Engineers, prepared by Innovative Technical Solutions, Inc.*
- *Soil Vapor Survey Report, Former NIRF Site, April 13, 2007, prepared by Kennedy/Jenks Consultants*
- *Environmental Summary Report, Former NIRF Site/Space Bank, May 22, 2007, prepared by Kennedy/Jenks Consultants*
- *Draft Final Phase I Environmental Site Assessment, Space Bank Mini Storage Facility, April 17, 2008, prepared by Ninyo & Moore*
- *Tenant History Report, Space Bank Facility, July 3, 2008, prepared by Kennedy/Jenks Consultants*
- *Removal Action Workplan (RAW), Former Naval Information Research Foundation Under Sea Center (AKA Space Bank Mini Storage Facility, June 16, 2017, prepared by Ninyo & Moore*
- *Draft Final Remedial Investigation and Feasibility Study (RI/FS), Former Naval Information Research Foundation Undersea Center (AKA Space bank Mini Storage Facility), December 11, 2017, prepared by Ninyo & Moore*
- *Draft Final Remedial Investigation and Feasibility Study Former Naval Former Naval Information Research Foundation Under Sea Center (AKA Space Bank Mini Storage Facility) 3202 East Foothill Boulevard, November 3, 2017, prepared by Ninyo & Moore (see Appendix J)*
- *Removal Action Workplan Former Naval Information Research Foundation Undersea Center (Aka Space Bank Mini Storage Facility) 3202 East Foothill Boulevard, December 11, 2017, prepared by Ninyo & Moore (see Appendix K)*
- *Building 5 Anechoic Tank Evaluation Former Naval Information Research Foundation (NIRF) Undersea Center Current Space Bank Mini Storage Facility 3202 East Foothill Boulevard, April 12, 2018, prepared by Ninyo & Moore (see Appendix L)*

In addition, the following list includes pertinent DTSC documents and correspondence:

- *Review of Remedial Investigation and Feasibility Study Report for the Former Naval Information Research Foundation Under Sea Center (AKA Space Bank Mini Storage Facility), DTSC, February 22, 2017.*
- *Executed Amendment to Agreement and Covenant Not to Sue, DTSC, December 13, 2017.*

Based on the information provided in the assessment reports listed above, historical use of the property by the U.S. Navy for research and development of torpedoes and other weapon systems has resulted in the presence of contaminated soil, soil vapor, and sediments in the storm drain system. Numerous soil and soil vapor assessments have been conducted to evaluate the impact of the former military use on the site. The identified contaminants of concern (COCs) and an evaluation of the potential health risks associated with detected concentrations at the site, as detailed in previous assessment reports, are discussed below.

- **Contaminated Sediments in Drainage System.** Elevated concentrations of total lead exceeding hazardous waste criteria have been detected in sediment samples collected from the drainage system (i.e. sumps, catchment basins, seepage pits). In addition, elevated arsenic, mercury, and Total Petroleum Hydrocarbons (TPH) levels have been detected in connection with the storm drain system. Elevated lead levels were detected at depths up to 21 feet below grade in a seepage pit. Elevated concentrations of semi-volatile organic compounds (SVOCs), more specifically polycyclic aromatic hydrocarbons (PAHs), have been detected at concentrations exceeding Regional Screening Levels (RSLs) set forth by the US Environmental Protection Agency (US EPA) in sediment samples collected from catch basins. In addition, a health risk assessment conducted by Ninyo & Moore and documented in their 2017 RI/FS determined that SVOC concentrations in soil exceed the cancer risk and hazard index for a residential use scenario.
- **Lead and Mercury.** Elevated concentrations of mercury and lead exceeding RSLs were detected in soil at several locations (“hot-spots”) outside of the drainage system. Two lead and two mercury “hot spot” locations were identified. At one hot spot location, the mercury concentration exceeded the hazard risk for a residential use scenario, according to the health risk assessment conducted in Ninyo & Moore’s 2017 RI/FS.
- **TPH.** According to Ninyo & Moore’s 2017 RI/FS, an elevated concentration of TPH in the diesel range was detected in one location outside of the storm drain system and will be removed as a hot spot.
- **Volatile Organic Compounds (VOCs) in Soil Vapor.** Tetrachloroethylene (PCE), trichloroethylene (TCE), and carbon tetrachloride exceeded the DTSC California Human Health Screening Levels (CHHSL) of 0.470 µg/L, 1.3 µg/L, and 0.063 µg/L, respectively, for residential soil vapor at various locations throughout the site. Concentrations of carbon tetrachloride, PCE, TCE and dibromochloromethane in soil vapor exceed the cancer risk and hazard index set forth by the US EPA. PCE and carbon tetrachloride have been detected at depths up to 150 feet below grade in soil vapor.
- **Dioxins and Furans.** Dioxins and furans were detected in sediment samples in a catchment basin located near a former incinerator in Building 126. According to the 1999 Draft Site Investigation Report, the incinerator facility was believed to have provided the NIRF Under Sea Center with an enclosed receptacle for burning trash, and ash disposal practices were not known. The report indicated that dioxins were detected in sediment samples collected from a concrete-lined catchment basin above the Preliminary Remediation Goals (PRGs) set forth by US EPA Region 9 (PRGs) in effect at the time of the assessment (ACE, 1999). During a November 2001 assessment conducted by SAIC, soil samples were collected just below the pavement in two locations near the incinerator (SAIC, 2002). The samples were analyzed for metals, with the exception of arsenic, did not exceed PRGs. The samples were not analyzed for dioxins, however, Ninyo & Moore surmised in their 2017 RIFS that, since the metals did not appear to have migrated, dioxins and furans were unlikely to have migrated.

- **Polychlorinated Biphenyls (PCBs).** PCBs were previously present in transformer oil onsite, however, PCBs have not been detected in soil during any of the previous assessments conducted at the project site (Ninyo & Moore, 2017). Transformers containing PCBs were either removed from the site or their oil was removed and replaced (Tetra Tech, 1994; ACE, 1999).
- **Nitroisodimethylamine (NDMA).** According to Ninyo & Moore's 2017 RI/FS, NDMA has not been detected in soil during any of the previous assessments conducted at the project site.
- **Hexavalent Chromium.** Hexavalent chromium has been detected in soil at various locations onsite at concentrations exceeding the RSL. However, according to information provided in their 2017 RI/FS, based on data reviewed for a nearby site, Ninyo & Moore determined that the chromium concentrations were within typical regional background concentrations. DTSC concurred with this evaluation in their February 22, 2017 response letter.
- **Radioactive Materials.** Building 20 was noted to have contained unidentified classified material. A 1992 report by Wheeler and Gray for ACE indicated that a "Radioactive" sign had at one time been observed in the building but was no longer present. During a November 2001 site investigation conducted by SAIC four wipe samples were collected inside the building and were tested for gross alpha and beta radiation (SAIC, 2002). In addition, an instrument survey was conducted by SAIC's subcontractor Occupational Services, Inc. during the 2002 assessment within and around the perimeter of the building. No radiation was identified above background levels. It was speculated in the 2002 SAIC report that the radiation sign was related to x-ray equipment which may have been used in the building and/or supplies may have been present during Navy ownership. The torpedoes were reportedly x-rayed during non-destructive testing procedures (SAIC, 2002). According to the 2005 ACE PEA, the actual presence of the "Radioactive" sign was unconfirmed (Enviroguide, 2005).
- **Perchlorate.** According to information provided by the DTSC, a City of Pasadena Water and Power Department municipal water well known as the Jourdan Well, located on an adjacent property, was shut down in 1997 due to the presence of perchlorate and nitrates. Perchlorate is commonly used as a propellant for torpedoes; therefore, the subject site is a suspected source for the perchlorate contamination. Based on historical documentation provided by the Navy, torpedoes were developed and tested at the subject site, and were also tested at the nearby Morris Dam site. Perchlorate contamination has been identified at the Morris Dam. Therefore, it follows that torpedoes manufactured at the subject site may have contained perchlorate, and the nearby perchlorate groundwater contamination may have originated at the subject site. Although perchlorate has not been detected in soil onsite, additional, deeper soil samples, as well as groundwater samples, are necessary to determine if perchlorate exists in deep soils and groundwater beneath the project site, due to the mobile nature of perchlorate. Additional soil assessment and preliminary groundwater assessment for perchlorate has been mandated by the DTSC in their 2017 Amendment to Agreement and Covenant Not to Sue.

According to the DTSC, the additional assessment to evaluate the presence of perchlorate in groundwater and deeper soil will be conducted concurrent with the onset of site redevelopment and completion of the remediation field work, and is not required as part of the currently planned remediation. Based on historical assessments, perchlorate has not been detected in shallow soils, and groundwater is expected to be present deeper than 300 feet below grade. Further, perchlorate is not considered volatile and is not expected to present a vapor intrusion risk for the property. Therefore, the potential presence of perchlorate is not expected to present a health risk to construction workers or future residents onsite, or to occupants of surrounding properties.

The additional perchlorate investigation was requested by DTSC to provide additional data to inform potential future DTSC actions related to the existing areawide perchlorate contamination.

Based on these findings, the DTSC has directed the property owner to remediate the COCs prior to site redevelopment. According to the Executed Amendment to Agreement and Covenant Not to Sue, the current property owner has been required to prepare and submit a RI/FS for the remediation of shallow soils. The document further required the preparation of a RAW if DTSC determined that a removal action is appropriate within shallow soils. DTSC has since determined that removal actions would be required, and the RI/FS and RAW have been prepared for the property and are discussed below.

Based on the findings of previous site assessments and in response to DTSC requirements, Ninyo & Moore developed a RI/FS and a RAW. The proposed project includes implementing these documents. Accordingly, the following remediation measures would be implemented as part of the project to address COCs during redevelopment activities.

- **Storm Drain System:** The existing storm drain system would be removed, consisting of approximately 1,000 to 1,200 linear feet of concrete or clay pipe, numerous storm drain inlets and catch basins, and seepage pits. Storm water seepage pits are typically 6 feet in diameter and 18 to 25 feet deep. During excavation activities, the storm drain basins and pipes would be observed for any suspected breaks or leakage. Confirmation soil samples would be collected at a minimum of one sample per 20 linear feet of pipe removed. Samples would be analyzed for COCs at a state-certified laboratory. Clean overburden soil would be stockpiled separately from impacted soil, and clean soil would be re-used as backfill material. Samples would be collected from impacted soil for waste characterization. Remedial excavation includes removal of contaminated sediments associated with the storm drain system.
- **Impacted Soil Excavation:** Remedial excavations would be conducted in previously identified impacted areas. The lateral limits of proposed excavations are illustrated on Figure 7 of the RAW. The estimated volumes of soil to be excavated are as follows:

Clean Overburden	Non-Hazardous Waste	Non-Resource Conservation Recovery Act (RCRA) Hazardous Waste	RCRA Hazardous Waste
408 cubic yards	414.4 cubic yards	302.5 cubic yards	29.1 cubic yards

Excavations may be adjusted based on field conditions, i.e., visual observations or other field or instrument indications of potentially impacted soil. Confirmation samples would be collected at sidewalls and bottom of each remedial excavation and analyzed for COCs at a state-certified laboratory. Soil samples would be collected at a minimum frequency of one sample per each sidewall and bottom. Each excavation will be considered complete when concentrations of COCs in confirmation samples do not exceed site-specific cleanup goals identified in the RAW.

Following remedial excavation activities and prior to mass grading of the site, Ninyo & Moore would conduct a soil gas survey. Results of the survey would be used to conduct a Human Health Risk Assessment to evaluate if VOCs in soil gas pose a vapor intrusion health risk. If soil vapor concentrations detected during the initial soil gas survey exceed health risk criteria, i.e., a calculated cancer risk greater than  $1 \times 10^{-6}$  and/or hazard index greater than 1, Ninyo & Moore would conduct step-out excavations, per the RAW. An additional soil gas survey would be conducted after step-out

excavations and site-wide grading have been conducted. If a human health risk remains, passive systems to prevent the migration of VOCs into indoor air would be installed at the site, per Ninyo & Moore's 2017 RI/FS. The system may include impermeable vapor barriers and subslab passive venting systems. The venting system would be designed so that it could be converted to an active venting system if the passive system does not reduce VOC contaminant levels to below health risk thresholds. An active venting system would include the use of fans to depressurize the subslab area, thus actively removing vapors from beneath the building. Based on information provided by the DTSC, if passive or active systems are utilized to prevent vapor migration, a Land Use Covenant would be required, and recorded, and an Operation and Maintenance (O&M) Plan would be developed for the systems.

In addition to addressing remediation of soil, the DTSC is requiring the property owner to conduct a Preliminary Groundwater Investigation (PGI) consisting of the installation of four groundwater monitoring wells. Soil samples are to be collected at 50-foot intervals. Fifteen soil samples would be analyzed for VOCs and perchlorate. Groundwater samples would be collected at the time of well installation and during three subsequent quarterly groundwater monitoring events. Groundwater samples would be analyzed for VOCs and perchlorate. If elevated concentrations of VOCs and perchlorate are detected in groundwater, groundwater remediation may be warranted. DTSC will evaluate the findings of the groundwater monitoring activities and remedial alternatives for groundwater will be developed at a later date. As previously noted, the additional perchlorate and VOC investigation is being requested by DTSC to provide additional data to evaluate deeper soil conditions and to inform potential future DTSC actions related to the existing areawide perchlorate and VOC contamination. The proposed project would not risk exacerbating this existing environmental condition.

The remediation activities, as well as subsequent assessment activities, would be implemented as outlined in the RAW and RI/FS and under the direction of the DTSC. All applicable federal, state, and local regulations would be adhered to during remedial excavations and transport of wastes.

City of Pasadena  
**3200 East Foothill Boulevard Mixed Use Project**

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This section analyzes the project’s impacts on hazards and hazardous materials. As discussed in the Project Description, the property was historically used by the U. S. Navy for research and development of torpedoes and other weapon systems. The historical property use has resulted in the presence of COCs in the soil and soil vapor beneath the site. However, as discussed in the Project Description, the site is currently under the oversight of the DTSC. Plans for remediation and additional assessment have been approved by the DTSC and would be implemented as part of the project by Ninyo & Moore, as detailed in their 2017 RAW and RI/FS documents. Implementation of activities outlined in these remediation documents would reduce hazards to less than significant levels for the identified COCs.

In addition to the COCs addressed in the 2017 RAW and RI/FS, Rincon has identified the following additional concerns which have not been addressed in the RAW or RI/FS.

- Water remaining in an onsite anechoic tank previously used for torpedo testing may contain elevated concentrations of metals or other COCs, therefore sampling and analysis of the water and offsite disposal would be necessary.
- Groundwater contamination may be identified during groundwater monitoring outlined in the RAW. It is possible that groundwater remediation would be required in the future.

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

**LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED**

Generally, the exposure of persons to hazardous materials could occur in the following manners: 1) improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development, particularly by untrained personnel; 2) an accident during transport of hazardous waste; 3) environmentally unsound disposal methods; or 4) fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

The project involves construction activities associated with removal of the existing uses, excavation and disposal of contaminated soil and storm drain features, grading, and construction and operation

of a 550-unit mixed-use (residential and commercial) development. Due to the historical use and identified contamination present, the project site is currently listed as a State Response facility and the DTSC is currently providing oversight for environmental assessment and proposed remediation, as discussed in the Project Description. COCs include metals, PAHs, dioxins and furans, perchlorate and VOCs in soil and VOCs in soil vapor. Perchlorate and VOCs have been identified as potential COCs in groundwater and are discussed further in Part d.

Soil remediation and removal of the storm drain system will involve the excavation of impacted soil and sediments, and the transport of these materials to an offsite disposal facility. However, risks associated with these activities will be reduced to a less than significant level, as excavation and transport activities are required to be conducted in accordance with the RAW. As outlined in the RAW, excavation activities will be conducted in accordance with SCAQMD Rules 403, 1166, and 1466. Dust suppression will be conducted and VOCs will be monitored during excavation activities. In addition, construction activities will be conducted in accordance with requirements of the Construction Activities Storm Water General Permit, and best management practices in accordance with the site-specific stormwater pollution prevention plan (SWPPP) will be implemented which would prevent contaminated soils from migrating offsite. Furthermore, soil removal activities will be conducted in accordance with applicable laws and regulations of EPA RCRA, Federal and State Occupational Safety Health Administration (OSHA), Department of Transportation (DOT), and the DTSC (CCR Title 22) for the characterization, excavation, and off-site transport/disposal of contaminated soil, as outlined in Ninyo & Moore's Transportation Plan, included as Appendix A of the 2017 RAW. Further, the proposed project would be subject to mitigation measure MM-HAZ-1(b) from SCAG's 2016 RTP/SCS EIR, provided below, with regard to compliance with applicable federal regulatory provisions for transport of hazardous material.

Construction activities may also involve the routine transport, use, or disposal of hazardous materials such as petroleum-based fuels or hydraulic fluid used for construction equipment. However, for all transport and disposal activities, the construction contractor would be required to use standard construction controls and safety procedures that would minimize the potential for hazards associated with the transport, use, and disposal of hazardous materials. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, state, and federal law.

Any water remaining in the anechoic chamber historically used for testing torpedoes in Building 5, in addition to surface water reportedly present in Building 103, may need to be disposed of due to elevated levels of cadmium, copper, lead, mercury, chromium, and/or TPH. These waters will need to be properly characterized, i.e., samples collected and analyzed for COCs by a state-certified laboratory prior to disposal. Depending on analytical results, disposal of the water may represent a risk during handling and transport. Therefore, construction activities associated with the proposed project would involve the transport to and disposal of these hazardous materials at an approved disposal facility. However, hazards associated with transport and disposal could be reduced to less than significant with the implementation of mitigation measure HAZ-1.

Operation of the proposed project would not involve the use or storage of hazardous substances other than the small amounts of cleaning and degreasing solvents, fertilizers, pesticides, and other materials used in the regular maintenance of buildings and landscaping.

While the risk of exposure to hazardous materials cannot be entirely eliminated, best practices and adherence to the RAW can be implemented to reduce risk to acceptable levels. Adherence to Mitigation Measure HAZ-1, existing regulations as outlined in the RAW (which would ensure compliance with safety standards related to the use and storage of hazardous materials), and the



## **Exhibit 2**

**RESPONSE TO DTSC COMMENTS, REMEDIAL INVESTIGATION AND FEASIBILITY STUDY, FORMER NAVAL INFORMATION RESEARCH FOUNDATION UNDER SEA CENTER (AKA SPACE BANK MINI STORAGE FACILITY), NOVEMBER 2, 2017**

Reviewer/ Comment No.	DTSC Review Comment	TCC Response to Comment	Revision Location	DTSC Response to TCC Comments	TCC Response	Revision Location
8.	Section 8.2.4.1, Vapor Mitigation Systems for Future Buildings, Effectiveness HERO does not agree with applying the San Francisco Regional Water Quality Control Board (SFRWQCB) environmental screening levels (ESLs) as the action levels for VOC concentrations below the vapor barrier. HERO recommends that the soil gas levels be derived by applying an attenuation factor (AF) of 0.001 (Vapor Intrusion Guidance Document, Final, DTSC, 2011). The ESLs apply the AF of 0.002, which results in a more conservative soil gas value compared to the soil gas value based on the AF of 0.001, as recommended by DTSC. The proposed action levels below the vapor barrier should be changed to the following: <ul style="list-style-type: none"> <li>• Carbon tetrachloride 67 µg/m<sup>3</sup></li> <li>• PCE 460 µg/m<sup>3</sup></li> <li>• TCE 480 µg/m<sup>3</sup></li> </ul>	RIFS revised to no longer use the SFRWQCB ESLs. The action levels have been changed to the proposed action levels in DTSC comment no. 8 based on the referenced DTSC guidance document.	Section 8.2.4.1			
9.	Data Validation HERO questions the statement that remedial decisions can be made by using data that did not meet level 2 data validation. The validation process should qualify the data and R-qualified data should not be used in making decisions. Data qualified as estimated values may be used to support remedial decisions.	Section text revised to indicate that estimated data is usable for supporting remedial decisions.	Section 9			
Conclusions	This Draft RI/FS requires some changes that do not necessarily change the conclusion that VOCs in soil gas are the chemicals of concern that require remediation. It is important, however, that the deficiencies identified in the preceding specific comments should be addressed to lend quality and accuracy to the document.	Preceding comments addressed in referenced locations	See identified sections above			

**RESPONSE TO DTSC COMMENTS, REMEDIAL INVESTIGATION AND FEASIBILITY STUDY, FORMER NAVAL INFORMATION RESEARCH FOUNDATION UNDER SEA CENTER (AKA SPACE BANK MINI STORAGE FACILITY), NOVEMBER 2, 2017**

Reviewer/ Comment No.	DTSC Review Comment	TCC Response to Comment	Revision Location	DTSC Response to TCC Comments	TCC Response	Revision Location
7	It is suggested that the drinking water well concentration data, depths, screened intervals, and water levels, along with soil vapor probe, soil and groundwater data be used to present multiple lines of evidence that the deep soil vapor concentrations proposed to be left in place will not be a future threat to groundwater resources.	Per the scope of work within the PPA & subsequent PPA Amendment, the obligations of Pasadena Gateway, LLC are primarily limited to the following: <ul style="list-style-type: none"> <li>• Cleanup of site soils to provide a safe, healthy environment for future residential site users and provision of necessary documentation to DTSC (WP, RIFS, RAW, etc.)</li> <li>• Installation of four groundwater monitoring wells and four quarters of groundwater sampling and reporting.</li> </ul> Pasadena Gateway understands that obtaining this information may be useful to DTSC, however we believe it is outside the responsibilities and obligations of Pasadena Gateway, LLC under the PPA.	Section 7.2.3	No additional changes are necessary to the RIFS.	No action needed; issue closed	

## **Exhibit 3**

structures over the parking garages would not require additional vapor mitigation measures. VMSs for the slab-on-grade residential structures that do not have subterranean parking garages would include a sub-slab impermeable vapor barrier with a passive venting system. Installation of VMSs on slab-on-grade residential buildings provides attenuation of the vapors and thus reduces the risk of vapors intruding into the building, and lowering the health risk from this pathway.

### **6.3.3. Alternative 3 – Soil Excavation, Off-Site Disposal, and Soil Vapor Extraction**

Alternative 3 is similar to Alternative 2, in that it includes soil excavation of selected areas of the site shown in Figure 7 (AOC1, AOC2, AOC3). However, Alternative 3 would address remediation of AOC4, and deeper soil (greater than 25 feet bgs) if necessary, through use of soil vapor extraction (SVE).

SVE would require installation of vapor extraction wells to a depth of approximately 30 feet throughout the site, applying a vacuum, and capturing VOCs in carbon vessels. Such a process of removing VOCs from soil gas at the site would eliminate any potential vapor intrusion threat to future residential site users, but would be a costly and time-intensive process.

## **6.4. Evaluation of Remedial Alternatives**

A comparative analysis was conducted to identify the advantages of each of the three remedial action alternatives present in Section 6.3. The analysis was conducted using the nine NCP evaluation criteria listed in Section 6.1.

### **6.4.1. Overall Protection of Human Health and the Environment**

- Alternative 1 would not result in any reduction in the potential risk associated with the elevated COPCs detected in soil at the site and RAOs would not be met.
- Alternative 2 is overall protective of human health and the environment and would meet the RAOs for AOC1, AOC2, and AOC3. Via implementation of a post-excavation soil gas survey (with associated risk evaluation) and implementation of a VMS (if necessary) Alternative 2 also meets the RAOs for AOC4. If a VMS

Alternative 1 will not reduce the toxicity, mobility, and volume of COPCs in soil gas associated with their respective AOCs. Alternatives 2 and 3 will reduce the toxicity, mobility, and volume of COPCs associated with their respective AOCs.

#### **6.4.5. Short-Term Effectiveness**

- For Alternative 1, COPCs would be left in place that could be exposed during site development, thus Alternative 1 would not be considered short-term effective. Under implementation of Alternative 1, if the site was developed for residential and commercial use, it would be neither short-term nor long-term effective. Also during site development there would be potential short-term exposures of on-site workers to COPCs that remain in site soil during construction grading and excavation activities. These same activities would also increase the short-term risks to the surrounding community as impacted soil was released to the atmosphere during construction if construction mitigation measures are not implemented.
- Alternative 2 would result in potential short-term risks to site worker as soil is excavated and handled for AOC1, AOC2, AOC3, and AOC4. These risks would be adequately mitigated through construction control measures, such as dust suppression, air monitoring, and worker health and safety protection. Soil removed from AOC1, AOC2, and AOC3 could contain VOCs (AOC4) that could be released to the atmosphere during excavation, but would be mitigated through air monitoring and compliance with SCAQMD Rules 403, 1166, and 1466 requirements. Alternative 2 would be short-term effective if construction mitigation measures are implemented and the ARARs are followed.
- Alternative 3 to mitigate AOC4 would result in potential short-term risks to site workers and the community that would need to be mitigated through construction control measures such as dust suppression, air monitoring, and worker health and safety protection. Implementation of Alternative 3 would not be short-term effective in mitigating vapor intrusion to future structures based on the rapid construction schedule that will be implemented once development is approved. It is projected that implementation of Alternative 3 will take more than a year to remove soil vapors at the site to mitigate vapor intrusion potential. Future residential and commercial users could be exposed to vapor intrusion until such time that soil vapor is removed which could be more than a year.

Alternative 2 will be immediately effective given that proper construction control measures are implemented during the development phase of the project. Alternatives 1 and 3 are not considered immediately effective in the short-term.

#### **6.4.6. Implementability**

- Alternative 1 would be difficult, if not impossible, to implement administratively, because agencies would not likely issue the necessary approvals to leave COPCs in place at the site without remedial action.

## Exhibit 4

	<p><b>TCR-1 Native American Monitoring</b></p> <p>During ground-disturbing activities, a monitor meeting the satisfaction of the Gabrieleño Band of Mission Indians—Kizh Nation shall be present. Consistent with Mitigation Measure 4-1 in the Pasadena General Plan EIR, if Native American artifacts are found, all ground disturbing activities in the immediate vicinity of the find shall be halted until the find is evaluated by a Registered Professional Archaeologist. If testing determines that significance criteria are met, then the Project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; and provide a comprehensive final report, including site record to the City and the South-Central Coastal Information Center at California State University, Fullerton. No further grading shall occur in the area of the discovery until Planning Department approves the report. Subsequently, the find shall be turned over to the tribe. In addition, any cultural resources found shall be treated in accordance with regulatory requirements. Grading and excavation may continue around the isolated area of the find so long as the activities do not impede or jeopardize the protection and preservation of any cultural resources as determined by the monitor.</p>
<input type="checkbox"/> Utilities / Service Systems	

Mitigation measures identified in the Lead Agency Final Environmental Document have been adopted by DTSC for this Project and will be implemented to avoid, reduce, or substantially lessen the project impacts. No additional mitigation measures are necessary, and no additional mitigation monitoring plan is required pursuant to CEQA.

For each significant environmental effect identified for the Project:

- Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the Lead Agency Final Environmental Document.
- Such changes or alterations are within the responsibility and jurisdiction of the Placer County not DTSC.
- Such changes have been adopted by this public agency or can and should be adopted by this public agency.
- Mitigation measures included in the Lead Agency Final Environmental Document are infeasible, and therefore, will not be incorporated into the DTSC Project for the following reasons: N/A

**Based on the above findings, DTSC concludes:**

The proposed Project will not result in significant and unavoidable effects to the environment.

The proposed Project will result in significant and unavoidable effects to the following environmental resources:\*

- Air Quality
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geology/ Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/ Water Quality
- Land Use/Planning



## Exhibit 5

investigation conducted by Spectrum Geophysics in June 1998 was unable to locate a tank in the area (Maness, 1998). Former UST locations are shown on Figure 3.

In 1998, USACE submitted a work plan to DTSC to investigate specific areas of the Site. DTSC commented that the work plan was insufficient in addressing all potential areas of concern, but agreed that any information gathered would help determine further actions. In August 1998, the USACE conducted an investigation at the Site that included site-specific research and sampling of sediment, subsurface soil, and surface water. This investigation focused mainly on sampling sediment in and soil near features associated with storm water collection, including catch basins, inlets, and seepage pits. The locations of such features are shown on Figure 3 and a seepage pit design diagram is included in Appendix C. Results were reported in the *Draft Site Inspection Report*, dated June 1999. Upon review, DTSC determined that the investigation was inadequate and incomplete in its scope and presentation. Following this and internal review, USACE determined that additional field sampling and analysis should be conducted to address DTSC's perceived data gaps and withdrew the draft report; i.e., the report was never officially finalized and released, although copies of the draft were provided to and kept by DTSC and Space Bank.

### **3.1.3 Reports & Investigations from 2001 to 2002**

To address the perceived data gaps, a second site investigation was undertaken in November 2001 by Science Application International Corporation (SAIC) on behalf of USACE. Field work was conducted to characterize the soil and sediment at additional locations on the Site and to further characterize select areas previously sampled in 1998. The *Draft Site Investigation Report and Site Assessment* that included information from this and the 1998 study was submitted to DTSC in July 2002. DTSC offered comments on the report, which generally accepted the data submitted and requested additional sampling throughout the Site. This draft report was also withdrawn by USACE, with revision of the report suspended until research on historical operations of the Site had been conducted. This was done to comply with investigation and funding restrictions within the DERP-FUDS program. As with the 1999 report, the report was never officially finalized and released, although copies of the draft were provided to and kept by DTSC and Space Bank.

Research conducted by the USACE subsequent to the 2002 draft report led them to conclude that not all the areas of the Site investigated in 1998 and 2001 were eligible for response under DERP-FUDS. Certain areas investigated were found to have been beneficially used by Space Bank subsequent to Navy/DOD ownership of the Site. The specific features considered ineligible were the remaining buildings, stormwater drainage system, and transformers on the Site.

### **3.1.4 Reports & Investigations from 2003 to 2005**

In December 2003, SAIC released the *Final Report, Nonpoint Source Pollution of the Stormwater Drainage System* that addressed potential impacts associated with the stormwater drainage system at the Site on behalf of the USACE. The report concluded that the chemical profile of the sediments found in the stormwater drainage system could not be attributed to specific historical or current operations at the Site. Comparison of chemicals detected in sediment with the composition of urban stormwater runoff led SAIC to conclude that sediments in the stormwater drainage system had concentrated metals from stormwater runoff from Site parking lots and pavement, the adjacent Foothill Boulevard, and I-210.

As a consequence of USACE's reluctance to further investigate or remediate the Site, DTSC issued an *Imminent and Substantial Endangerment Determination and Remedial Action Order* (Order) on 2 December 2004. The Order was later revoked by DTSC as described in Section 3.1.5.

The *Draft Final Preliminary Endangerment Assessment Report*, produced by EnviroGuide for the USACE, was released in August 2005. The report only deals with results from the 1998 and 2001 investigations for those areas that were deemed DERP-FUDS eligible. These areas include the former incinerator (Building 126), former flammable materials storage (Building 131), and footprints of former buildings that were demolished during the period of DOD ownership (see former buildings on Figure 2). A risk assessment performed as part of the report concluded that exposure to soil at the investigated sites did not present a human health risk under a hypothetical residential use scenario. The report also concluded that, with the exception of soil beneath the former flammable materials storage (Building 131), both the 1998 and 2001 investigations found no evidence of release of chemicals from the DERP-FUDS eligible portions of the Site. The report also concluded that, other than the soil impacts associated with the former flammable materials storage (Building 131), no further action is warranted for the DERP-FUDS eligible portion of the Site.

DTSC's 12 December 2005 response to the 2005 EnviroGuide report rejected the findings of the risk assessment portion of the report. DTSC stated that the risk assessment was not adequate and that further investigation of the Site, including soil vapor, groundwater, and soil matrix sampling, is necessary.

Separate from the USACE investigations, a subsurface soil investigation was conducted by SECOR on behalf of Kaiser in December 2005. Soil borings were advanced throughout the Site to investigate environmental concerns identified in the *Phase I Environmental Site Assessment* completed by SECOR in 2005. Some of the borings were located in areas previously investigated by USACE and others were intended to generally screen the Site for potential chemical releases. The final report, *Expedited Phase 2 Environmental Site Assessment Report*, dated 1 February 2006, summarized the analytical findings of the soil sampling and found that none of the detected constituents were above screening level concentrations. No other conclusions or recommendations were provided.

### **3.1.5 Reports & Investigations from 2006**

In March 2006, USACE submitted a work plan to DTSC for a focused site investigation in the area of the former flammable/hazardous storage building (Building 131). In a follow-up e-mail to DTSC on 21 April 2006, USACE indicated that they would proceed with the work plan as written, without DTSC comments, and reiterated a prior challenge of DTSC's legal authority in this case. DTSC's 15 May 2006 response found the work plan to be deficient citing that it did not characterize the release of hazardous substances from military activities at the Site to soil and groundwater.

On 27 and 28 April 2006, an investigation of the vertical and lateral extent of existing VOC impacts to soil in the vicinity of the former flammable/hazardous storage building (Building 131) was conducted on behalf of the USACE by Innovative Technical Solutions, Inc. (ITSI). The *Final, Focused Site Investigation Report* (November 2006) stated that the subsurface conditions have been characterized in accordance with the requirements and limitations of the DERP-FUDS program. In conclusion, the report recommends that no further DOD action is indicated for soils near the former flammable/hazardous storage building (Building 131).

Response comments provided by DTSC in their 31 October 2006 letter found the focused investigation inadequate, insufficient in scope or type of sampling, and lacking the required signature of a State-registered geologist.

On 13 November 2006, DTSC revoked the Order and entered into a formal dispute resolution process with the USACE. An initial meeting between DTSC and USACE representatives took place



## Department of Toxic Substances Control



Linda S. Adams  
Secretary for  
Environmental Protection

Maureen F. Gorsen, Director  
5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

November 13, 2006

Mr. Larry Sievers  
FUDES Program Manager  
U. S. Army Corps of Engineers  
Los Angeles District  
P.O. Box 532711  
Los Angeles, California 90053-2325

Dear Mr. Sievers:

The California Department of Toxic Substances Control (DTSC) hereby invokes dispute resolution pursuant to Section IV of the Department of Defense/State of California Memorandum of Agreement (DSMOA) executed on February 4, 1993. The purpose of the dispute is to resolve disagreements between DTSC and the United States Army Corps of Engineers (USACE) over future remedial actions at the Naval Information Research Foundation Under Sea Center (NIRF) site in Pasadena, California. DTSC and USACE met on October 30, 2006 to informally resolve this dispute and were not successful. **By this letter, DTSC revokes the remedial action order issued to USACE and other potentially responsible parties on December 2, 2004.** If the dispute resolution process does not resolve the above disagreement, DTSC will immediately reissue the order and refer the matter to the California Attorney General for enforcement.

### Background

The NIRF site is a former naval facility where torpedoes and classified materials were tested from 1945 to 1974. The NIRF site was sold in 1978 to Space Bank, Ltd, who now rents the property for metal, furniture, and fixture shops; parking for recreational van rentals; and private storage space. USACE, as the Department of Defense (DoD) agent for remedying hazardous substance releases at formerly used defense sites, collected samples in 1998 and 2001 from the storm water collection system, catch basins, storm drain inlets, seepage pits, and manholes. Significant concentrations of lead, arsenic, mercury, antimony, cadmium, chromium, benzo(a)pyrene, benzo(a)anthracene, chrysene, and dioxins were detected in those samples.

## Jomsky, Mark

---

**From:** Ross, Trenton <Trenton.Ross@colliers.com>  
**Sent:** Monday, April 29, 2019 11:14 AM  
**To:** Jomsky, Mark  
**Subject:** Development of Space Bank - GREEN LIGHT

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Good Morning,

As a Pasadena resident, I am expressing my support for the new development on the 9.27 acre space Bank Property – 3202 East Foothill Blvd Pasadena.

We need affordable housing in Pasadena and this project will provide 69 affordable housing units and create many Union Jobs. The project is close to the Gold line station and will a great fit for Pasadena and its development as a community.

To better understand the environmental remediation please call, Brad Cox of Trammell Crow Company at 310-363-4707 or Cell 310- 462-0715. He is the developer who will develop and remediate the site.

Best Regards,

**Trenton Dane Ross**

CalBRE Lic# 02031980

Direct +1 818 334 1848 | Mobile +1 626 319 5226

Main +1 818 334 1900 | Fax +1 818 334 1876

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Glendale, CA 91203  
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PASADENA CITY CLERK

Honorable Pasadena City Council Members,

This letter is to support the 3200 Foothill Pasadena project.

From what I have learned, the site has been used by the Navy in the past and there has been toxic and polluted substance left for about 20 years. The project, as part of its goal, is to clean up the polluted soil and as a someone who lives in Pasadena I want to express my support for it.

I understand the concerns of my neighbors and from what I have read, the developer is aimed to respond to all the concerns raised by our neighbors and incorporate recommendations to protect Pasadena resident's safety in the final issued work plan. Without this development, the cleanup may never happen.

The project grants us affordable housing, smart transit adjacent developments and the millions of dollars in fees for clean-up costs invested by the developer which would be a huge benefit and win for the City and its resident.

Thank you for your hard work for our city.

## Jomsky, Mark

---

**From:** Fengshuang Zhang <zhangfs.rex@gmail.com>  
**Sent:** Monday, April 29, 2019 10:44 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** 3200 Foothill Pasadena project

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Honorable Pasadena City Council Members,

This letter is to support the 3200 Foothill Pasadena project.

From what I have learned, the site has been used by the Navy in the past and there has been toxic and polluted substance left for about 20 years. The project, as part of its goal, is to clean up the intoxicated soil and as someone who lives in Pasadena I want to express my support for it.

I understand the concerns of my neighbors and from what I have read, the developer is aimed to respond to all the concerns raised by our neighbors and incorporate recommendations to protect Pasadena resident's safety in the final issued work plan. Without this development, the cleanup may never happen.

The project grants us affordable housing, smart transit adjacent developments and the millions of dollars in fees for clean-up costs invested by the developer which would be a huge benefit and win for the City and its resident.

Thank you for your hard work for our city.

--  
Fengshuang (Rex) Zhang  
290 N Hudson residence

## Jomsky, Mark

---

**From:** Pete Hernandez <PHernandez@saifulbouquet.com>  
**Sent:** Monday, April 29, 2019 11:36 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** City Council Meeting: 3200 E. Foothill Blvd.

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

The Honorable City Council of the City of Pasadena:

As a Pasadena resident that has had generations including my Grandparents and their siblings to my nieces and nephews that has lived and still live in the great City of Pasadena, I have great interest in the planning of the cleanup of the Space Bank site (3200 East Foothill Boulevard, Pasadena, CA). I have Family that live across the street on Santa Paula Ave. It would give me great peace of mind for my family and friends in the area, also with potential new residents that this project will allow. To be able to raise the next generations to come without the worry of toxins that may have been left from previous residents.

Please **SUPPORT** the 550-unit Space Bank project located at 3200 E Foothill Blvd in East Pasadena. This TOD project will bring much needed housing, including 69 affordable units, to East Pasadena and be a vast improvement to the currently underutilized site.

Please **SUPPORT** the Trammell Crow Company & High Street Residential in their 12+ year effort to clean up a contaminated site to the highest regulatory standard in conjunction with the DTSC , a State agency whose entire mission is to protect public health and the environment from harm. Trammell Crow has a proven track record of cleaning up brownfield sites over the past 70+ years in business and is committed to a transparent and open clean-up process.

Please **SUPPORT** the local community and help expedite a mixed-use project that:

- Makes Foothill Blvd much more walkable
- Introduces 2+ acres of open, public space for community benefit.
- Commits to a Local Hire Program.
- Commemorates and conveys the site's history.
- Implements the vision of the General Plan and concentrates housing on transit.

Sincerely,

Pasadena resident  
509 E. Howard St.  
Pasadena, Ca 91104

### **PETE HERNANDEZ**

IT Support Specialist

#### **Saiful Bouquet Structural Engineers**

*an MBE / SBE firm*

155 N. Lake Ave, 6<sup>th</sup> Floor, Pasadena, CA 91101

T: (626) 304-2616 [www.SaifulBouquet.com](http://www.SaifulBouquet.com)

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Pasadena ■ Los Angeles ■ San Diego



## Jomsky, Mark

---

**From:** Masood Inamdar <Minamdar@saifulbouquet.com>  
**Sent:** Monday, April 29, 2019 11:22 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** Support for 550 - unit Space Bank Project located at 3200 E Foothill Boulevard, East Pasadena

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

The Honorable City Council of the City of Pasadena:

Last July, the Pasadena City Council approved the mixed-use project at 3200 Foothill. The approved project includes 481 market rate and 69 badly needed affordable apartment units. The project will be built by skilled union workers, the developer has committed to an aggressive local hiring, training, and procurement program to ensure the residents of Pasadena benefit from this project.

Now that the City process has ended, the State Department of Toxic Control Substances (DTSC) will oversee the clean-up of the existing soil contamination resulting from the U.S. Navy's former use of the site. As a concerned citizen, after 20 years of many extensive environmental site investigations, we are pleased that that the site will be cleaned up and turned into a much-needed housing and residential community

It has come to my attention that several our community members are making false accusations about the cleanup effort, it is important we allow the DTSC experts to oversee the cleanup of the site. If the project does not move forward, the worst possible outcome would occur, and the site may never be cleaned up.

Please **SUPPORT** the local community and help expedite a mixed-use project that:

- Makes Foothill Blvd much more walkable
- Introduces 2+ acres of open, public space for community benefit.
- Commits to a Local Hire Program.
- Commemorates and conveys the site's history.
- Implements the vision of the General Plan and concentrates housing on transit.

Please continue to move this project forward.

### **MASOOD INAMDAR**

Engineer

#### **Saiful Bouquet Structural Engineers**

*an MBE / SBE firm*

155 N. Lake Ave, 6<sup>th</sup> Floor, Pasadena, CA 91101

T: (626) 304-2616 [www.SaifulBouquet.com](http://www.SaifulBouquet.com)

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## Jomsky, Mark

---

**From:** Kyle Spitznagel <kylespitz@gmail.com>  
**Sent:** Monday, April 29, 2019 9:35 AM  
**To:** Jomsky, Mark  
**Subject:** 3200 Foothill Project

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Mr. Jomsky:

My wife and I are excited about the 3200 Foothill project, which will bring much needed housing near transit, a 1-acre park, local hire programs for our residents, and affordable housing that our community desperately needs. My wife and I have lived in Pasadena for the past 6 years in developments similar to this one (Avalon Del Mar Station a few years ago and Arpeggio currently), and in fact, my wife works a few blocks north of 3200 Foothill. I feel that I have an obligation as a Pasadena resident to support affordable housing for my neighbors, and this project would help nearly 70 families have affordable housing within the city boundaries.

The Ellington project at 3300 Foothill was a substantial improvement to the area a few years ago, transitioning the area to higher density near the metro Gold Line, improving walkability and the human scale of the neighborhood. The new proposed project at 3200 Foothill would do the same.

Furthermore, the developer has committed to the cleanup of the property. I understand that some residents have concerns about the noise or construction traffic created by the cleanup effort, but it seems much better to remove these toxins now before they contaminate our city ground water supply. The developer has agreed to clean up the site at their cost and if the project does not move forward, we may be stuck with the contaminants at the site for a long time to come.

We are supportive of this project. Please consider the substantial benefits this project will bring to the broader community while weighing the concerns that other residents have raised.

Kyle Spitznagel, 6-year Pasadena Resident

## Jomsky, Mark

---

**From:** Ben Caras <benycaras@gmail.com>  
**Sent:** Monday, April 29, 2019 10:29 AM  
**To:** Wilson, Andy  
**Cc:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Jomsky, Mark; Mermell, Steve  
**Subject:** 3200 East Foothill Project

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Dear Councilman Wilson,

I am writing to you today to ask that you continue to vote in favor of the residential development project located at 3200 E Foothill Blvd in East Pasadena. This project will bring much needed housing to Pasadena.

My wife and I have lived in Pasadena for the past seven years. We have made this city our home. We hope to own here one day but the economics make that difficult. Nevertheless, we continue to save money however possible as we strive toward our ultimate goal of being a Pasadena home owner. However, until that day comes we hope to continue to live and work here and appreciate all the things our beautiful city offers. But with so many others finding Pasadena desirable, too, it places a large demand on housing. And with demand comes the inevitable reduction in supply - which is directly affecting rents. And if Pasadena cannot keep up with the demand for housing, how are working professionals and responsible families supposed to continue to live here and contribute to the richness of the cultural landscape? Who will be the ones that contribute to and support the local businesses? Which demographic spends more - those under 55 or those over 55?

Please vote in favor of this project once again. The impact it will have on this community will resonate for years to come.

Sincerely,

Ben Caras  
840 E. Green St. #417  
Pasadena, CA 91101

## Jomsky, Mark

---

**From:** alice@urbangrid.com  
**Sent:** Monday, April 29, 2019 12:03 PM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** 3200 Foothill

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Honorable Pasadena City Council Members,

I am writing in support of the 3200 Foothill Pasadena project. It is important to remember why this project was approved by the Council. The project implements the goals of our General Plan putting housing near transit, the project is 2/3 of allowable density, it will reduce vehicle trips, activate Foothill/Kinneloa Avenues, creates a 1-acre onsite park, preserves and commemorate the site's history as a US Navy research facility, partners with local business for procurement and creates local jobs. The project provides 550 much needed housing units to meet our State housing requirements with 69 onsite affordable units!

The site has had 20 years of extensive investigation by the Department of Toxic and Substances Control who has worked diligently with the Developer, Trammell Crow Company, to establish a plan to finally cleanup the property after many years of use by the Navy. Without this development, there will be no cleanup of the property.

I understand the concerns of our neighbors and I too want to ensure the property is properly cleaned up to protect us from any contaminants, but let's have the state agency experts do their job and move this forward. From what I have read, they will respond to all the concerns raised by our neighbors and incorporate recommendations to protect our safety in the final issued work plan. Without this development, the cleanup will never happen.

We need affordable housing, smart transit adjacent developments and the millions of dollars in fees and clean-up costs invested by the developer will be a huge benefit and win for the City.

Thanks for listening.

**Alice Lee**  
279 E Glenarm Street, Unit 5  
Pasadena, CA 91106

## Jomsky, Mark

---

**From:** Jivan V. Pachpande <Jivan@saifulbouquet.com>  
**Sent:** Monday, April 29, 2019 9:45 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** 3200 Foothill

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Honorable Pasadena City Councilmembers:

As a Pasadena resident, I have followed with great interest the planning of the cleanup of the Space Bank site. In reading and following the project approval process, it has become evident that the site has been significantly investigated during a 20-year period by the California DTSC, the agency responsible for the cleanup of properties in our area. Most recently, I have also followed the local East Pasadena residents who are claiming the developer is planning on starting to construct the project without cleanup of the site.

Although not an expert on site cleanup, the reports indicate the site must be cleaned up prior to any construction of buildings and the DTSC will oversee the cleanup to ensure the project is safe for future residents.

It is important we build housing to allow people to live near their employment and not be required to spend hours on freeways commuting to and from work. The project is adjacent to our East Pasadena transit stop and is smart development for our City.

I am very supportive of this project and most important, please allow the project to move forward to cleanup this site.

Thanks  
Regards,

### **JIVAN VILAS PACHPANDE, MSCE**

Project Engineer

#### **Saiful Bouquet Structural Engineers**

*an MBE / SBE firm*

155 N. Lake Ave, 6<sup>th</sup> Floor, Pasadena, CA 91101

T: (626) 304-2616 [www.SaifulBouquet.com](http://www.SaifulBouquet.com)

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## Jomsky, Mark

---

**From:** Richard Ge <mailrichardge@gmail.com>  
**Sent:** Monday, April 29, 2019 8:31 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** Letter to Pasadena City Council Members

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Honorable Pasadena City Council Members,

As a resident of Pasadena at the Paseo Colorado, I am writing in support of the 3200 E. Foothill Pasadena project.

It's my understanding that the site was contaminated by military testing and has been allowed to stay contaminated for many years. The site needs to be cleaned up and it seems the only way this will happen is if the project is approved to move forward.

The developer has said they'll clean up the site in compliance with the requirements set by the DTSC agency.

I've been eagerly awaiting new housing options in Pasadena. Supply has been very limited and we need more housing, especially near transit. We are paying for Measure M and we deserve to reap the benefits of the Metro line improvements. Without housing on transit, Measure M doesn't really help us.

Housing is extremely limited in Pasadena and we need more of it. Our residents and businesses depend on it.

Please support this project and housing in Pasadena.

Thank you for your time.

Sincerely,

Richard Ge,  
Current Resident at the Paseo Colorado.

19 APR 29 09:13AM

CITY CLERK

Honorable Pasadena City Councilmembers:

Re: 3200 Foothill

As a Pasadena resident, I have followed with great interest the planning of the cleanup of the Space Bank site. In reading and following the project approval process, it has become evident that the site has been significantly investigated during a 20-year period by the California DTSC, the agency responsible for the cleanup of properties in our area. Most recently, I have also followed the local East Pasadena residents who are claiming the developer is planning on starting to construct the project without cleanup of the site.

Although not an expert on site cleanup, the reports indicate the site must be cleaned up prior to any construction of buildings and the DTSC will oversee the cleanup to ensure the project is safe for future residents.

It is important we build housing to allow people to live near their employment and not be required to spend hours on freeways commuting to and from work. The project is adjacent to our East Pasadena transit stop and is smart development for our City.

I am very supportive of this project and most important, please allow the project to move forward to cleanup this site.

Thanks

Lewis L. Tsangeos

830 Laguna Rd.

Pasadena, CA 91105

## Jomsky, Mark

---

**From:** Paul Little <Paul@pasadena-chamber.org>  
**Sent:** Monday, April 29, 2019 7:18 AM  
**To:** City\_Council; Mermell, Steve; Reyes, David; Jomsky, Mark  
**Subject:** Clean up at 3500 E. Foothill

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Good morning.

I am out of town and unable to attend tonight's Council meeting.

I have experience with the California Department of Toxic Substances during my time serving on the Board that built the Gold Line to Pasadena.

This is a diligent and stringent state agency that is determined to perform its responsibilities in a manner that most effectively protects the people of California. They are exacting, thorough, independent and extremely conscientious. Their inspectors are extremely diligent.

I am confident that, under their supervision and inspection, cleanup at the Space Bank site will be completed in a way that absolutely protects the current residents of the area and future inhabitants of the project.

Please do not interfere with the Department's performance of their duties, or assume this is anything but a professional agency that takes its mandate and responsibility extremely seriously.

Thank you,

Paul Little  
President and Chief Executive Officer  
Pasadena Chamber of Commerce

Sent from a remote device. Please excuse any bizarre auto-spell errors. (If they're really funny, please let me know.) Thanks.



## Jomsky, Mark

---

**From:** Vanessa Hong <vanessajhong@gmail.com>  
**Sent:** Sunday, April 28, 2019 11:04 PM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** 3200 Foothill - Project Support

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Honorable Pasadena City Councilmembers,

As a Pasadena resident, I have followed the planning of the cleanup of the Space Bank site. In reading and following the project approval process, it has become evident that the site has been significantly investigated during a 20-year period by the California DTSC, the agency responsible for the cleanup of properties in our area. Most recently, I have also followed the local East Pasadena residents who are claiming the developer is planning on starting to construct the project without cleanup of the site.

Although not an expert on site cleanup, the reports indicate the site must be cleaned up prior to any construction of buildings and the DTSC will oversee the cleanup to ensure the project is safe for future residents.

It is important we build housing to allow people to live near their employment and not be required to spend hours on freeways commuting to and from work. The project is adjacent to our East Pasadena transit stop and is smart development for our City.

I am very supportive of this project and most important, please allow the project to move forward to cleanup this site.

Thanks,

Vanessa Hong

## Jomsky, Mark

---

**From:** Marrone, Michael <Michael.Marrone@ClarionPartners.com>  
**Sent:** Saturday, April 27, 2019 6:12 PM  
**To:** ek@cityofpasadena.net; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark  
**Subject:** 3200 Foothill - Pasadena

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Honorable Pasadena City Councilmembers,

My family and I are a resident of East Pasadena at 2030 Jefferson Dr. Pasadena CA 91104.

I am writing in enthusiastic support of the Pasadena Gateway, 3200 Foothill Boulevard project. The project implements the goals of our General Plan putting housing near transit, the project is 2/3 of allowable density, it will reduce vehicle trips, activate Foothill/Kinneloa Avenues, creates a 1-acre onsite park, preserves and commemorate the site's history as a US Navy research facility, the developer will partner with local business for procurement and committed to creating an aggressive local jobs program.

The project provides 550 much needed housing units to meet Pasadena's housing requirements with 69 onsite affordable units!

Most important, Trammell Crow Company has voluntarily committed to safely cleanup the site, at their own cost and expense, under the strict oversight of the DTSC to the highest applicable regulatory standard for its intended use as a multi-family community.

As a Senior Vice President at Clarion Partners, I have the opportunity of working as an investment partner with Trammell Crow Company on many complex environmentally challenged properties. In fact, Neal Holdridge with Trammell Crow Company has worked on the environmental characterization of this property for the last 10 years and I can speak from personal experience, there is no one person better at solving complex environmental clean-up challenges than Neal. Neal is our 'go to' problem solver on all our national portfolio of properties with environmental cleanup challenges.

Trammell Crow is highly respected in every City where we work together and have a stellar reputation of being transparent and open to the local community in the environmental cleanup execution.

If we do not move forward on this development, the site may never be cleaned up, we lose millions of fees that can be used for parks/transportation/infrastructure upgrades and we fail to provide much needed affordable housing for workers who cannot afford to live in Pasadena close to their places of employment.

Please continue to support this important project for the East Pasadena community.

Thank you

Michael Marrone

## Jomsky, Mark

---

**From:** KP <kpham33@gmail.com>  
**Sent:** Friday, April 26, 2019 8:37 PM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** 3200 E Foothill Blvd in East Pasadena

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Dear Councilman Hampton,

Please **SUPPORT** the 550-unit Space Bank project located at 3200 E Foothill Blvd in East Pasadena. This TOD project will bring much-needed housing, including 69 affordable units, to East Pasadena and be a vast improvement to the currently underutilized site.

Please **SUPPORT** the Trammell Crow Company & High Street Residential in their 12+ year effort to clean up a contaminated site to the highest regulatory standard in conjunction with the DTSC , a Stata agency who's entire mission is to protect public health and the environment from harm.

Trammell Crow has a proven track record of cleaning up brownfield sites over the past 70+ years in business and is committed to a transparent and open clean-up process.

Please **SUPPORT** the local community and help expedite a mixed-use project that:

- Makes Foothill Blvd much more walkable
- Introduces 2+ acres of open, public space for community benefit.
- Commits to a Local Hire Program.
- Commemorates and conveys the site's history.
- Implements the vision of the General Plan and concentrates housing on transit.

Sincerely,

Khuong Pham

137 N. Oak Knoll Ave. #10

Pasadena, CA 91101

## Jomsky, Mark

---

**From:** Shelly Lee <splee562@gmail.com>  
**Sent:** Monday, April 29, 2019 9:04 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** 3200 Foothill Project

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

Honorable Pasadena City Councilmembers:

Re: 3200 Foothill Project

As a Pasadena resident, I have followed with great interest the planning of the cleanup of the Space Bank site. In reading and following the project approval process, it has become evident that the site has been significantly investigated during a 20-year period by the California DTSC, the agency responsible for the cleanup of properties in our area. Most recently, I have also followed the local East Pasadena residents who are claiming the developer is planning on starting to construct the project without cleanup of the site.

Although not an expert on site cleanup, the reports indicate the site must be cleaned up prior to any construction of buildings and the DTSC will oversee the cleanup to ensure the project is safe for future residents.

It is important we build housing to allow people to live near their employment and not be required to spend hours on freeways commuting to and from work. The project is adjacent to our East Pasadena transit stop and is smart development for our City.

I am very supportive of this project and most important, please allow the project to move forward to cleanup this site.

Thank You

Shelly Lee

773 S. Marengo Ave. #4

Pasadena, CA 91106

## Jomsky, Mark

---

**From:** Mike Burke <mburke@smithemery.com>  
**Sent:** Monday, April 29, 2019 9:11 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** E-mailed in support of 3200 E. Foothill Blvd

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Dear Councilman Masuda,

Please **SUPPORT** the 550-unit Space Bank project located at 3200 E Foothill Blvd in East Pasadena. This TOD project will bring much needed housing, including 69 affordable units, to East Pasadena and be a vast improvement to the currently underutilized site.

Please **SUPPORT** the Trammell Crow Company & High Street Residential in their 12+ year effort to clean up a contaminated site to the highest regulatory standard in conjunction with the DTSC, a State agency whose entire mission is to protect public health and the environment from harm.

Trammell Crow has a proven track record of cleaning up brownfield sites over the past 70+ years in business and is committed to a transparent and open clean-up process.

Please **SUPPORT** the local community and help expedite a mixed-use project that:

- Makes Foothill Blvd much more walkable
- Introduces 2+ acres of open, public space for community benefit.
- Commits to a Local Hire Program.
- Commemorates and conveys the site's history.
- Implements the vision of the General Plan and concentrates housing on transit.

Emailed on behalf of –

James P Slater  
457 S. Roosevelt Ave  
Pasadena, CA 91107

Regards,

Michael Burke  
Smith-Emery International  
**Los Angeles | San Francisco | Anaheim | Las Vegas | Shanghai**  
D: 213.699.7814  
C: 714.396.0448  
O: 213.749.3411 (Dispatch)

## Jomsky, Mark

---

**From:** Silvia Van Wingerden <silviavanwingerden@gmail.com>  
**Sent:** Monday, April 29, 2019 9:24 AM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** SUPPORTING 3200 Foothill

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Honorable Pasadena City Councilmembers:

Re: 3200 Foothill

I'm am a Pasadena resident in District 4 and have lived here for 6 years. I have followed with great interest the planning of the cleanup of the Space Bank site and the addition of much needed housing in this city. In fact, I was upset to learn from my neighbors that I missed council Gene Masuda the other weekend who apparently came by the house to speak about this project.

We are in desperate need of housing in this city! Smart development isn't about developing in the fire prone hillsides, but near transit - where people can live, work and commute more efficiently. This is the urban density we need. Lets stop the NIMBYism, we must evolve as a city and community and create housing for all! I believe that the best cities embrace change, as it is inevitable.

In reading and following the project approval process, it has become evident that the site has been significantly investigated during a 20-year period by the California DTSC, the agency responsible for the cleanup of properties in our area. Most recently, I have also followed the local East Pasadena residents who are claiming the developer is planning on starting to construct the project without cleanup of the site.

Although not an expert on site cleanup, the reports indicate the site must be cleaned up prior to any construction of buildings and the DTSC will oversee the cleanup to ensure the project is safe for future residents. This must happen now, or else it may never happen!!! And if the site is contaminated now, isn't this worse than a imminent clean up?

My children are 3 and 1, and frequent (daily) the public parks and libraries in the neighborhood - Vina Viejas, Victory Park and Hasting Ranch Library... and I believe in the future of our children and neighborhood, which will be better if this development has the opportunity to clean up this site versus leaving it underutilized and contaminated!

I am very supportive of this project and most important, please allow the project to move forward to cleanup this site.

Thanks,

Silvia Van Wingerden Themudo

Resident, District 4

3300 E Sierra Madre Blvd, Pasadena, CA 91107

## Jomsky, Mark

---

**From:** Talin Espinoza <tespinoza@twininginc.com>  
**Sent:** Monday, April 29, 2019 1:43 PM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** Pasadena Resident FOR - Pasadena Gateway, 3200 Foothill Boulevard project

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Honorable Pasadena City Council Members,

I am a Pasadena resident, born and raised in Pasadena, living within blocks of this project at 285 Sierra Madre Villa, Pasadena 91107. My family, church, school communities are all in Pasadena and close to this project. Transit Oriented Development promoted the health of our city.

I am writing in enthusiastic support of the Pasadena Gateway, 3200 Foothill Boulevard project. It is important to remember why this project was approved by the Council. The project implements the goals of our General Plan putting housing near transit, the project is 2/3 of allowable density, it will reduce vehicle trips, activate Foothill/Kinneloa Avenues, creates a 1-acre onsite park, preserves and commemorate the site's history as a US Navy research facility, partners with local business for procurement and creates local jobs. The project provides 550 much needed housing units to meet our State housing requirements with 69 onsite affordable units!

Please **SUPPORT** this TOD project. It will bring much needed housing, including 69 affordable units, to East Pasadena and be a vast improvement to the currently underutilized site.

Please **SUPPORT** the Trammell Crow Company & High Street Residential in their 12+ year effort to clean up a contaminated site to the highest regulatory standard in conjunction with the DTSC, a State agency who's entire mission is to protect public health and the environment from harm.

Trammell Crow has a proven track record of cleaning up brownfield sites over the past 70+ years in business and is committed to a transparent and open clean-up process.

Please **SUPPORT** the local community and help expedite a mixed-use project that:

- Makes Foothill Blvd much more walkable
- Introduces 2+ acres of open, public space for community benefit.
- Commits to a Local Hire Program.
- Commemorates and conveys the site's history.
- Implements the vision of the General Plan and concentrates housing on transit.

Sincerely,

**Talin Espinoza**  
Senior Vice President,  
Strategic Growth

**Twining, Inc.**  
[tespinoza@twininginc.com](mailto:tespinoza@twininginc.com)  
Home Address: 285 Sierra Madre Villa, Pasadena



## Jomsky, Mark

---

**From:** Guillaume Rodrigue <Grodrigue@saifulbouquet.com>  
**Sent:** Monday, April 29, 2019 1:24 PM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Cc:** Andrea Hammer  
**Subject:** 3200 Foothill

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

The Honorable City Council of the City of Pasadena:

Last July, the Pasadena City Council approved the mixed-use project at 3200 Foothill. The approved project includes 481 market rate and 69 badly needed affordable apartment units. The project will be built by skilled union workers, the developer has committed to an aggressive local hiring, training, and procurement program to ensure the residents of Pasadena benefit from this project.

Now that the City process has ended, the State Department of Toxic Control Substances (DTSC) will oversee the clean-up of the existing soil contamination resulting from the U.S. Navy's former use of the site. As a concerned citizen, after 20 years of many extensive environmental site investigations, we are pleased that that the site will be cleaned up and turned into a much-needed housing and residential community. It has come to my attention that several our community members are making false accusations about the cleanup effort, it is important we allow the DTSC experts to oversee the cleanup of the site. If the project does not move forward, the worst possible outcome would occur, and the site may never be cleaned up.

Please continue to move this project forward.

Thank you.

### **GUILLAUME RODRIGUE, MSSE**

Senior Engineer

#### **Saiful Bouquet Structural Engineers**

*an MBE firm*

155 N. Lake Ave, 6<sup>th</sup> Floor, Pasadena, CA 91101

T: (626) 304-2616 [www.SaifulBouquet.com](http://www.SaifulBouquet.com)

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Pasadena ■ San Diego

## Jomsky, Mark

---

**From:** Martin Ortega <mortegala@gmail.com>  
**Sent:** Monday, April 29, 2019 12:32 PM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** Needed Housing for Pasadena

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

The Honorable City Council of the City of Pasadena:

Last July, the Pasadena City Council approved the mixed-use project at 3200 Foothill. The approved project includes 481 market rate and 69 badly needed affordable apartment units. The project will be built by skilled union workers, the developer has committed to aggressive local hiring, training, and procurement program to ensure the residents of Pasadena benefit from this project.

Now that the City process has ended, the State Department of Toxic Control Substances (DTSC) will oversee the clean-up of the existing soil contamination resulting from the U.S. Navy's former use of the site. As a concerned citizen, after 20 years of many extensive environmental site investigations, we are pleased that the site will be cleaned up and turned into a much-needed housing and residential community

It has come to my attention that several our community members are making false accusations about the cleanup effort, it is important we allow the DTSC experts to oversee the cleanup of the site. If the project does not move forward, the worst possible outcome would occur, and the site may never be cleaned up.

Please continue to move this project forward and thank you for your time.

Thank you.  
Martin Ortega  
Pasadena Resident.

## Jomsky, Mark

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**From:** Ken Kules <kules.ken@gmail.com>  
**Sent:** Monday, April 29, 2019 1:31 PM  
**To:** Jomsky, Mark  
**Cc:** Masuda, Gene  
**Subject:** City Council April 29, 2019 Agenda Item 14: PLANNED DEVELOPMENT 36 – PASADENA GATEWAY 3200 E. FOOTHILL MIXED-USE PROJECT ("SPACE BANK")

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Please enter the following comments into the record for the subject item:

First, I support the scope of work that is being proposed by the Department of Toxic Substances Control for the subject project. I request, however, that the "adaptive management" components of DTSC proposal (e.g., results of testing under buildings subsequent to demolition & testing of deep soils and groundwater) be made available timely for public information prior to proceeding with associated site remediation.

With regard to testing by the Navy at the Space Bank site, the following restrictions were placed on the Navy's testing of torpedoes at Morris Dam under the October 1, 1945 and July 2, 1968 agreements with the Metropolitan Water District:

*No explosives shall be detonated in or adjoining the reservoir or dam; provided, that harmless explosions resulting from the use of rocket motors and the detonation or primers or signalling devices are not prohibited hereby, and provided further, that reasonable use by the United States of explosives for construction or experimental purposes, at locations and in accordance with plans previously approved by the District's General Manager, will be permitted.*

This suggests that it's not appropriate to assume that use of "live" torpedoes was necessary for testing during the time that the Navy occupied the Space Bank property.

The DTSC has indicated that the source for their statements that the Jourdan groundwater well was shut down in 1997 as a result of perchlorate contamination was based on Pasadena Water and Power's 2013 and 2016 "Report On City's Water Quality Relative To Public Health Goals." (The SCEA has a similar claim that is attributed to DTSC.) PWP has since asserted that the 2013/2016 PHG reports were poorly-worded and the Jourdan well use was discontinued in 1995 (there is no PWP record of perchlorate in groundwater having been tested by PWP prior to 1997).

Ken Kules  
Pasadena Resident

2221 Rosecrans Avenue  
Suite 200  
El Segundo, California 90245

310 363 4707 Direct  
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bcox@trammellcrow.com  
www.trammellcrow.com

Bradley T. Cox  
Senior Managing Director

Trammell Crow Company  
Development and Investment  
Greater Los Angeles

19 APR 29 02:34 PM

CITY CLERK

Vis Email

April 29, 2019

The Honorable City Council of the City of Pasadena  
City Hall  
100 Garfield Ave,  
Pasadena, California 91101

Re: 3200 E. Foothill Boulevard/Item No. 14 on the Council's April 29 Agenda

Dear Councilmembers:

As you know, I am the Senior Managing Director of Trammell Crow/High Street Residential, the developer of the mixed-use project at 3200 E. Foothill Boulevard. Last July, this Council approved our mixed-use project at 3200 Foothill. The approved project includes 481 market rate and 69 badly needed affordable apartment units. Our project will be built by skilled union workers, and we have committed to an aggressive local hiring, training, and materials procurement program to ensure the residents of Pasadena benefit from this project.

Now that the City process has ended, the State Department of Toxic Control Substances (DTSC) is considering approval of Removal Action Work Plan (RAW) to address existing soil contamination resulting from the U.S. Navy's former use of the site. This plan is the culmination of over 20 years of site investigation and testing, including 15 environmental studies and hazardous material investigations conducted by eight different qualified experts that collectively have included 382 soil samples and 157 soil gas samples. ***These extensive studies and testing, which have been carefully review by the DTSC, fully identified all contaminants of concern (COC) at the site.***

The RAW will ensure that all COCs will be removed and properly disposed in accordance with all applicable laws, codes and regulations. Following this removal, the site will be re-tested, and health risk assessment will be conducted, all under DTSC supervision, to confirm that the site is safe for the planned residential use. If there is any residual health risk remaining from soil vapor which may potentially emanate into the proposed buildings, the DTSC will require vapor intrusion barriers or other necessary measures to fully mitigate this risk. ***The RAW and DTSC oversight will ensure that the site is cleaned-up to the highest applicable standards for residential use and that there will be no health or safety risks to our future residents or the larger community.***

It has come to my attention that there have been false accusations made about the cleanup effort, including that we are somehow not honoring our commitments and that DTSC is allowing us to cut corners. I want to assure the Council that nothing could be further from the truth. ***We remain***

***committed to completely fulfilling all our obligations in an open and transparent process and delivering a safe and fully remediated site.***

We have a long record as a public company in maintaining the highest level of integrity and following thru on our commitments. We have been openly invited back in every community that we have developed properties. Our firm and I personally have been involved in the development of millions of square feet of properties in Los Angeles County. For the last 30 years we have turned former trash dumps, sand and gravel pits and numerous military sites into productive tax generating assets for their local communities.

We are extremely proud of our track record in solving complex environmental issues on properties. ***We have voluntarily undertaken the clean-up effort and have entered into binding contractual commitments to fully and safely clean-up the site.*** As of this date we have invested over \$5 million dollars into this property for environmental site testing, design, and CEQA documentation. Without our commitment to clean-up the site, I am fearful that the site will never be cleaned-up.

It is important to recognize that all aspects of clean-up will be under the close supervision of the DTSC and in accordance with federal and state safety regulations, and South Coast Air Quality Management District and Los Angeles Regional Water Quality Control Board regulations. The statutory mission of DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products. ***As they have done on millions of acres of brownfield sites locally and across the state, DTSC will fulfill its legislative duty and will exercise vigilant oversight of our clean-up efforts.***

We appreciate and welcome the City's interest in hiring an independent 3<sup>rd</sup> Party expert to review the RAW, provide advice to the City, and together with the DTSC, monitor the clean-up process. ***We support an open and transparent process that will safely and completely clean-up the site.***

I would be pleased to answer any questions you may have; our team will be at the Council meeting this evening to publicly address any concerns of the Council for the Public. Thank you.

Very truly yours,

  
Bradley Cox

cc: Steve Merrill, City Manager

David Reyes, Planning & Community Development Director

Michele Beal Bagneris, Esq., City Attorney

APR 29 09:39AM

CITY CLERK

Honorable Pasadena City Councilmembers:

Re: 3200 Foothill

As a Pasadena resident, I have followed with great interest the planning of the cleanup of the Space Bank site. In reading and following the project approval process, it has become evident that the site has been significantly investigated during a 20-year period by the California DTSC, the agency responsible for the cleanup of properties in our area. Most recently, I have also followed the local East Pasadena residents who are claiming the developer is planning on starting to construct the project without cleanup of the site.

Although not an expert on site cleanup, the reports indicate the site must be cleaned up prior to any construction of buildings and the DTSC will oversee the cleanup to ensure the project is safe for future residents.

It is important we build housing to allow people to live near their employment and not be required to spend hours on freeways commuting to and from work. The project is adjacent to our East Pasadena transit stop and is smart development for our City.

I am very supportive of this project and most important, please allow the project to move forward to cleanup this site.

Thanks,

A handwritten signature in blue ink, appearing to read "Keith Law", is written over the typed name.

Keith Law

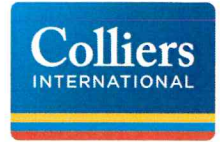
Bill Ukropina  
Senior Executive Vice President  
CalBRE Lic#00820557

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FAX 818.334.1876  
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19 APR 29 04:26PM

CITY CLERK



April 29, 2019

Mayor Terry Tornek  
City of Pasadena  
100 North Garfield Avenue  
Pasadena, CA 91101

Dear Mayor Tornek,

I am writing to express my support as an East Pasadena resident and long-time community volunteer, for the new development on the 9.27 acre Space Bank Property at 3202 East Foothill Boulevard. I was twice President of Pasadena American Little League at Hamilton Park in Hastings Ranch, served on the Region 13 AYSO Board of Directors for five years and coached youth soccer in Pasadena for 11. I also served on the Parks and Recreation Commission for 5 years and was very helpful in creating the Off Leash Dog Park on East Paloma Street. I currently serve on the Pasadena Cancer Support Community Board of Directors and my wife Linan and I have supported many Pasadena based charities for over 30 years. I want what is best for East Pasadena.

I have been marketing the 9.27 acre Space Bank Property for the last twelve years since 2007. There have been some negative articles in local papers and other media regarding the extensive environmental remediation plan that will be completed on the Space Bank Property when escrow closes. I wanted to make sure you are fully aware that the DTSC has a very specific remediation plan, and the property will be cleaned up to the highest standards of care. The new project consists of 555 residential units that include 69 affordable. **Construction will not commence until the site is cleaned up.**

As you know, we really need affordable housing in East Pasadena, and this new project will create **\$18.594 million in fees** to Pasadena, provide 69 affordable housing units and create many Union jobs. The proposed development is located only 160 yards from the Sierra Madre Villa Gold Line Station and is transit oriented.

You are welcome to call Brad Cox of Trammell Crow Company, the developer that wants to purchase the property, at 310-363-4707 or Cell 310-462-0715, regarding the environmental remediation that will be completely supervised by the DTSC on the Space Bank Property. Brad is also happy to meet you to explain the environmental remediation plan.

Thank you for supporting this new project.

A handwritten signature in blue ink that reads "Bill Ukropina".

Bill Ukropina  
2339 Lambert Drive  
Pasadena  
Ph: 626.233.0383

04/29/2019  
Item 14



## Jomsky, Mark

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**From:** Justin Tang <jusmtang@gmail.com>  
**Sent:** Monday, April 29, 2019 4:23 PM  
**To:** Tornek, Terry; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; Jomsky, Mark; Mermell, Steve  
**Subject:** The Pasadena Gateway Project

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Honorable Pasadena City Council Members,

I am writing in enthusiastic support of the Pasadena Gateway, 3200 Foothill Boulevard project. It is important to remember why this project was approved by the Council. The project implements the goals of our General Plan putting housing near transit, the project is 2/3 of allowable density, it will reduce vehicle trips, activate Foothill/Kinneloa Avenues, creates a 1-acre onsite park, preserves and commemorate the site's history as a US Navy research facility, partners with local business for procurement and creates local jobs. The project provides 550 much needed housing units to meet our State housing requirements with 69 onsite affordable units!

Most important, Trammell Crow Company has voluntarily committed to safely cleanup the site, at their own cost and expense, under the strict oversight of the DTSC to the highest applicable regulatory standard for its intended use as a multi-family community. Trammell Crow did not cause any of the contamination present and is a company with an excellent reputation and proven track record of cleaning up contaminated sites.

If we do not move forward, the site is never cleaned up, we lose millions of fees that can be used for parks/transportation/infrastructure upgrades and we fail to provide much needed affordable housing for workers who cannot pay to live in the community they work.

Please continue to support an important project for the East Pasadena community.

Best,

Justin Tang

--

Justin M. Tang  
(626) 807-6970

<https://www.linkedin.com/in/jmtang6/>