

CORRESPONDENCE

Jomsky, Mark

From: Shelley Appelbaum <shelley.appelbaum@gmail.com>
Sent: Monday, July 15, 2019 4:18 PM
To: Jomsky, Mark
Cc: Steven Appelbaum
Subject: 253 South Los Robles Appeal

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

Hello Mr. Jomsky,

As Pasadena homeowners we would like to express our opinion on where we think Pasadena is moving vs. where our preferences are.

1. The development of large residential and office buildings should be limited in size. Traffic pressures are already quite significant in our City. Please don't make them worse.

2. Although we love Pasadena for its quaint architecture (and own a historically designated house ourselves), we do not agree that aesthetics should be dictated by the City. Homeowners and builders should have the freedom to decide what their properties look like.

Thank you very much,

Shelley & Steve Appelbaum
701 S Oakland Ave

Jomsky, Mark

From: Woodward, Julia <woodward@caltech.edu>
Sent: Monday, July 15, 2019 12:15 PM
To: Jomsky, Mark
Subject: 253 South Los Robles Appeal

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To the Mayor and City Council of Pasadena:

My husband and I wish to express our opposition to the size of the project that is being considered for 253 South Los Robles. While we are not opposed to Pasadena growing in a thoughtful way, we are concerned that too many permits are being awarded in an already densely populated area. Traffic on Los Robles is already a nightmare at rush hour times....

and we haven't even seen the completion of the projects which are going to bring even more traffic to this area: the Kaiser Permanente Project, the condominium that is being retrofitted at the southwest corner of Los Robles and Cordova, and the project at the southwest corner of Colorado Blvd and Los Robles. Please, please reconsider the impact that another huge housing complex is going to have on this area! At the very least, please limit the number of units which will be allowed.

Julia and James Woodward
694 South Oakland Avenue
Pasadena, CA

Jomsky, Mark

From: Erika Foy <foyfamily@sbcglobal.net>
Sent: Thursday, July 18, 2019 12:56 PM
To: Jomsky, Mark
Cc: Tornek, Terry; Reyes, David; Wilson, Andy; Mermell, Steve; Hampton, Tyron; McAustin, Margaret; Masuda, Gene; Madison, Steve; Gordo, Victor; Kennedy, John; Paige, Jennifer; Mirzakhanian, Talyn; Thyret, Pam
Subject: Erika Foy 253 South Los Robles

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Dear Mr Jomsky, City Council and Mayor,

I believe the city has not disclosed enough detailed environmental impacts in regards to the development 253 South Los Robles especially in a cumulative manner with the multitude of other developments in close proximity. By claiming 253 South Los Robles is "infill exempt" the community is at a loss of understanding the environmental impacts the project will have with traffic, traffic noise, air quality of idling cars next to kitchen windows, tree removal and the adjacent impacts on historic structures and the neighboring building 245 Cordova. Did you know that 245 Cordova might be caused to lean when the subterranean garage is dug for 253 South Los Robles?

CEQA is the law of our state for a reason. It is there to help evaluate the environmental impact on communities especially disadvantaged and historic communities.

The city has been misleading and negligent in explaining the environmental impacts for those living in and around 253 South Los Robles especially in regards to traffic noise. Using the street Cordova as the main segment for traffic noise counts is wrong mainly because the city self proclaims it to be one of the least traveled streets. Traffic noise is based on traffic counts and the city used the least invasive streets to claim CEQA exemption.

Not only is there an issue with traffic counts, CEQA can only be exempt if the project fits within our General Plan and it is obvious by every count this is not the case. When residents agreed on our General Plan they did not assume you would be taking out protected trees, agreeing on ugly architecture and going beyond state levels of traffic noise limits. What happens to all those who live in affordable units near these massive developments on Los Robles? Are they not protected under CEQA when it comes to environmental concerns?

I believe the city has yet to make a solid case that this project is what we agreed upon in 2015 with our General Plan. Please record my full support of Ken McCormick's opinion piece. My hope is every city official and council member reads it. This appeal is not about affordable housing but rather protecting those who must live with the cumulative effects of massive new development in and around their community.

Thank you, Erika Foy

<https://gcc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.pasadenanow.com%2Fmain%2Fguest-opinion-ken-mccormick-ceqa-and-urban-projects-does-it-matter%2F%23.XTDCxyVIDDu&data=02%7C01%7Cmjomsky%40cityofpasadena.net%7C1e61097ae50e487d459c08d70bb9f92a%7C82d9fc002c664402a28fc6bc32e491%7C1%7C1%7C636990765690742605&sdata=phAT7hkqlrRUwyZvVrsZOnRz8eod2F9zGbyqQvuPfvQ%3D&reserved=0>

Sent from Erika's iPhone

Guest Opinion | Ken McCormick: CEQA and Urban Projects: Does It Matter?

By KEN McCORMICK

Published : Wednesday, July 17, 2019 |

The City Council will be deciding the fate of two controversial development projects next Monday night, July 22.* While the proposed buildings are in different parts of downtown and have different characteristics, they are similar in one very important policy matter: their proposed special exemption from review under the California Environmental Quality Act (CEQA), an expediting process known as the "Infill Exemption."

In these cases, prior to even making a determination about the quality of the projects, the City Council, acting in a somewhat judiciary capacity, must decide that both projects warrant exemption from a detailed CEQA review. To do so, Council members must first find that each project is completely consistent with Pasadena's General Plan policies and all zoning regulations, including the urban design elements of the Central Business District Plan. The only inconsistencies in these cases, under state court rulings, can be in the projects' height and bulk.

This is a very high standard. The General Plan is the living constitution of our City. It establishes how Pasadena is meant to grow in the future, how it should look and how it should function. The General Plan and zoning documents necessarily have some pretty subjective qualities, such as contextual architecture, respect for historic neighborhoods, traffic mitigations and non-monolithic massing of buildings. But most people involved in the public debate know what was intended by the General Plan. It is a document that required decades of compromises between neighborhood and downtown interests, civic activists and developers, growth advocates and preservationists, and these compromises have built a better Pasadena.

The City has been processing these two projects through the system fairly expeditiously, as projects go. Initially, staff determined that for a project to be exempt from CEQA, to meet the state-required standard of total "consistency" with the General Plan, decision-makers only had to evaluate a project's quantifiable metrics, rules like setbacks from the property lines, driveway widths, and such. Under public pressure, however, the City acquiesced recently on one of these projects, determining that decision-makers review the qualitative aspects of a project's consistency as well as the easily observed metrics. This makes more sense, because the State law requires not just a look at the rules of the General Plan, but specifically at the purpose, or the "policies." Staff conducted a consistency review for this project on North Madison (adjacent to the historic Fuller campus) that Council will be wise to examine carefully. Developed by an outside consultant, the review appears exceedingly shallow, cherry-picking General Plan guidelines to find elements that were consistent, but avoiding blatant anomalies. It is more of an advocacy document than good analysis. But at least it is a step in the right direction.

Why is this policy issue important? What difference does expediting a project make if it helps reduce staff time? After all, CEQA is not a favorite state law for many Californians. CEQA places enormous burdens on developers to disclose detailed aspects of a project's impact on the environment, such as traffic, air quality, noise and adjacent historic structures. It is often exploited by labor unions to negotiate better wage contracts, or used capriciously by NIMBY groups to oppose nearby projects that otherwise would serve the greater public good.

But CEQA is the law, and it is still the best tool Californians have to evaluate the quality of a project on the future growth of their community. Without CEQA, Pasadenans would have had two enormous 19-story towers built at the corner of Los Robles and Colorado back in the 1980's, forever changing the small-town character of Pasadena's historic downtown. Without CEQA, Pasadena would have had a very large suburban-style office building at the corner of El Molino and Colorado across from the Playhouse, rather than what was eventually built, arguably one of the most beautiful and appropriate commercial buildings developed in Pasadena since the pre-war years. There are multiple examples when CEQA has helped inform residents of a project's problems, and allowed for a more intelligent debate.

With the two large projects going to Council July 22, despite considerable evidence that the projects will have significant impacts that have not been well analyzed or explained to the public, the City has so far avoided a deep look, going straight to the issue of the projects' benefits, like affordable housing units. We certainly need more affordable housing units. But the issue shouldn't be whether the project is good or bad until Council unequivocally determines the projects are eligible for a CEQA exemption, a step it cannot logically take at this point. Unlike some municipalities, we do not have a regularized process in place yet that requires the City to evaluate a project's overall consistency with the General Plan policies and zoning and design guidelines before determining that it is eligible to avoid a full CEQA review.

A number of projects have been given Infill Exemptions in recent years, including two that our company proposed in 2015. Up until now, none have been terribly controversial. Decision-makers and civic leaders have known intuitively whether a project is basically consistent with the General Plan – meeting tests like contextual massing and architecture, housing fulfillment and mobility objectives. The view has been, "Let's get these projects entitled and then let the Design Commission sort out other Plan and policy elements." In general, this short-hand process has worked. Good examples are the new condominium project at Oakland and Cordova or an upcoming apartment building at El Molino and Union Street.

But the two projects before Council on July 22 present serious General Plan questions that have been raised by leading neighborhood groups, including the Madison Heights Neighborhood Association, Pasadena Heritage, the Women's City Club and the Blinn House Foundation. One in particular has multiple conflicts, such as overshadowing an historic property, introducing a high ground floor parking garage which elevates the entire building (and creates an unattractive garage floor in a residential setting), failing to explore differentiated heights to break up massing. These are all incompatible elements with the General and Specific Plans. The other project on South Los Robles, which is more compatible with the General Plan architecturally, doesn't appear to satisfy noise and traffic goals, or at least the City doesn't appear to have objectively evaluated the issues.

Rather than stepping back and adopting a formal consistency review prior to giving a project the go-ahead, the City is advocating adoption of these projects and deflecting the real legal question, whatever their own attorneys advise otherwise: do these projects merit an exemption? A good case isn't being made. The issue isn't yet whether they should ultimately be built, but whether Council members, in their hearts, can make the determination that the projects are completely "consistent with the "all applicable general plan policies as well as with applicable zoning regulations" as required under State law.

CEQA has limitations. Even with a deeper CEQA review, both projects might be found to merit Council approval. But shortcutting the process isn't a good answer for Pasadena. We have invested mightily in a good General Plan over decades, and Council's first responsibility should be to insure it is upheld, that projects meet broader community objectives before they become eligible for exemption from CEQA evaluation, as state law requires.

Ken McCormick is a long-time Pasadena resident with an interest in civic affairs, having served on numerous City commissions. A former banker, he started Mill Creek Planning & Development to help activate the Playhouse District.

**The two hearings referenced are:*

July 22, 2019, 7:00 p.m. – Call for Review of a Board of Zoning Appeals Decision to the City Council Regarding Affordable Housing Concession Permit No. 11869 to Facilitate the Construction of a New 94,165 Square-Foot, Six-Story, 92-Unit, Multi-Family Residential Building (Including Eight "Very Low Income Units"), with 131 Parking Spaces in a Three-Level Subterranean Parking Garage for the Property Located at 253 South Los Robles Avenue

July 22, 2019, 7:00 p.m. – Appeal of Board of Zoning Appeals' Decision on Affordable Housing Concession Permit No. 11879 to Facilitate the Construction of a 72,000 Square-Foot, Five-Story Mixed-Use Project Consisting of 49 Residential Units (Including Four Units Dedicated To "Very-Low Income" Households), 4,210 Square Feet of Commercial Floor Area, and 101 Parking Spaces for the Properties Located at 127 & 141 N. Madison Avenue

My name is Erika Foy and I am here to represent MHNA on the appeal for 253 South Los Robles. I feel very fortunate to be here tonight to as the voice of this community. I also want to take this moment to thank you for serving our city and this council.

I am starting with this slide because I think it is really important to put faces to the decisions this body makes for our community. I thought it would be imperative to show who actually has to live with the outcomes tonight. Madison Heights is a thriving, beautiful community with kids, dogs, elderly and lots of historic homes. The decisions you make tonight and every night have the potential to help maintain the community we have or cause havoc within our boundaries with traffic, traffic noise, destruction of historical resources, tree removal, the loss of mountain views, well, you get the idea.

It is all the simple things we take for granted of what makes Pasadena so livable which are slowly being chipped away every time a development attempts to go beyond our General Plan. MHNA residents are in a difficult position because our beautiful and historic streets are utilized and accessed by many residents of Pasadena.

Our neighborhood is literally surrounded by all this upcoming development which is about to squash us into an inescapable island. It is not that we don't want development, it is just we want it according to what we all agreed on in 2015- our General Plan.

We believe our neighborhood will be exposed to noise levels that exceed established standards with this development combined with the 5 others nearby and further studies must be required before 253 South Los Robles is given their affordable housing concession permit. The minimal traffic study the city provided for this one property just doesn't fulfill what our General Plan has set out to do which is protect single-family neighborhoods.

The compounding result of these projects' generation of noise will forever change our neighborhood without the proper studies for mitigation provided through CEQA. We are also concerned about how the process of CEQA exemption is occurring. Developers should not be given height and mass concessions before design review is finished. The only way a project can be CEQA exempt is if it fits within our General Plan and as I go through the issues, you will see it does not.

The board of MHNA believes an error has been made by city staff and the hearing officer in determining that the proposed project is exempt from environmental review under CEQA. MHNA is asking for a full CEQA review of traffic, noise and environmental impacts on our neighborhood. The reason being, South Los Robles, goes directly through our boundaries starting at the north side of California Blvd and ends down at where it meets Marengo Ave. The proposed developments north of MHNA on Los Robles are in no question going to add an untold number of cars in our neighborhood boundaries affecting the noise and livability of our environment. We believe the livability of our neighborhood and those above us will be ultimately changed for the worse if you continue down this path.

It is important to remember not all density bonus projects qualify for CEQA exemptions and it seems our city has forgotten this. When you have a property zoned for 71 units as 253 South Los Robles is, and then it expands up to 92 units, there is a chance that the additional density may bring the project out of the coverage of our CEQA approval for our general plan. Does our EIR cover the larger project especially since there have been 5 other significant projects approved within .25 miles? At what point do all of these projects tip the scales where we take a deep breath and evaluate further how all this development will affect our current residents?

As you can see here the design commission had an issue with the massing of the project and how it related to the street. This reason alone makes the infill exemption inappropriate because the City failed to first establish whether the project was truly consistent with other elements of the General Plan and Zoning Code.

What's alarming about the process is once the developer gets their entitlements tonight with the form of massing and height, it makes it impossible for design commission to have any real impact by asking the developer to step back a bit! These concessions just get the architect completely around the height and mass issue by bringing forth the affordable housing concession first.

Since the city does not evaluate the project first from a design standpoint, it cannot decide whether to apply the infill exemption which is only allowed if the project is consistent with the General Plan. If we insisted our developers first finish design review before asking for the concessions, I think we would all save ourselves a huge headache and we would create a city envisioned by our General Plan.

In 2010, 3,000 participants were questioned about the future of Pasadena in relation to the General Plan. What's interesting is that Comments related to density, design, and traffic presented some of the most pressing themes for residents.

The 9-month outreach effort, found that the majority of participants were concerned that worsening traffic, density, and design of future developments would negatively impact their quality of life. These same residents overwhelmingly agreed that they wanted a "small town feel, good neighborhoods, historic architecture, and tree preservation" in their city, that these factors must be maintained, and that any future changes should not threaten the way of life in Pasadena...Look at us tonight fighting for those exact values we asked to remain.

The exemption of Class 32 urban infill exemption found in CEQA Guidelines Section 15332 being used tonight is available if the project is consistent with applicable general plan designation and zoning which we see already with the design review it is not. In addition, the project also cannot have any significant effects relating to traffic noise, but you will see as I proceed, this just isn't the case.

253 Los Robles is the 3rd successive project of the same type of multi-family housing on the same block of Los Robles over an extremely short period of time. We have 399 Del Mar of 55 condos being built where you see the dirt lot and trucks, and 245 Los Robles (105 condos) where the tall black building is in back, and both share property lines with 253 Los Robles who plans 92 condos and you can see just in between the dirt lot and the black building.

Here you can see the satellite image of the area and the properties under construction. It is really something to think an entire block of Pasadena undergoing renovation and yet we haven't stopped to look at the cumulative impacts this will have on neighborhoods below or allow for any further environmental studies.

Let us not forget the new Kaiser Medical school, Hyatt Place hotel and, soon to be built apartments at 260 Colorado.

It is our sincere belief city staff and hearing officer have erred in failing to require an initial study particularly since there are significant errors in the ESA Noise Technical Report. Please notice, it says right here on the top page, "CEQA Class 32 Categorical Exemption Report" Can you imagine how important this study is to MHNA since we believe 253 Los Robles should not be exempt? Let's dig through this but first let's look at the guidelines

In accordance with Appendix G of the State CEQA Guidelines, the proposed project must be studied for significant impacts related to noise levels in excess of standards established in the General Plan and the noise ordinance. ESA says 253 Los Robles does not reach any of these determinations but it is obvious to any Pasadena resident these several projects will in combination generate substantial additional noise in the area because they are all high vehicle trip generators and will add significant and unexpected vehicle trips to already studied roadways. The ESA evaluation did not include a cumulative understanding but rather just a simple and incorrect overview of the area. We believe the evaluation was not reflective of what is really happening in the area.

And this is what is really happening. We all know projects cannot be stopped by traffic impacts as per state law but traffic noise still pertains to CEQA and traffic noise is generated and calculated by traffic volumes.

So what does our General Plan say about noise? Well, it basically says you need to follow noise compatibility matrix which shows acceptable and unacceptable ranges of noise for various land uses.

We will have to refer to the Noise Element Table 3 for our guidelines. As you can see, the biggest concern is when it gets in the charcoal and very black zone. You can see when it hits 75 dBA in both low density and multi family, new construction should generally not be undertaken.

So what did the ESA Report on noise conclude on ambient and roadway noise and what was wrong with their evaluation?

- 1) They tested our busiest streets during non traffic hours. Here is a map of the locations tested.
And see here that Del Mar was tested at 940am whereas side street Euclid was tested at 830am. See the 69.4 value on R2 -Del Mar during non traffic times?
- 2) They used Cordova street segments for evaluating traffic noise levels which are inextricably linked to traffic volumes.
The City of Pasadena transportation department admits Cordova is way under the street capacity and is a quiet street on their road diet page.
But here we have three segments of Cordova representing traffic noise levels. Wouldn't it be better to test upper Los Robles or the segment in front of the project, or how about Del mar rather than Cordova? Would this have created a more correct picture of what is happening and possible tip the project to not being CEQA exempt?

Here you can see there is double the difference in traffic volume when you compare Cordova to Del Mar.

Did you know they have decibel apps on the iphone? So here I am at the exact location of R2 at 830 am on March 20th to test what the level of noise would be at the more impactful time of 830am. Curious to know what happened?

My study came out at an average of 70.9 dBA and this is on my cell phone. There were sounds as great as 82.6

As you can see, there are single family homes right on this street and a church which all are limited at the 75 level. I am here to say, these folks shouldn't be living like this and something must be done. We must think about those living in these homes at these noise levels especially when all these projects are completed. What is going to happen?

It seems to be in both examples of ambient noise and traffic noise, ESA chose the area of value with the least impact. I actually find this issue so fascinating that I pulled the noise technical report for Kaiser Medical School which was done in 2017 to compare. My stomach dropped when I saw yet again, Cordova was used and Colorado Blvd. which is much closer was not. So how will we ever know what the real impact on real people unless we study this in an alternative view?

Would studying it from a perspective of a resident and not a developer change the outcome? Are the added trips in cumulation going to increase the ambient noise levels above the 5.0 on our streets? This is what CEQA is for. CEQA hasn't been tripped in the case for 253 Los Robles because they used all the wrong evaluations. If proper and relative streets were to have been used in the study, the outcomes would have been very different.

And to add to the gravity of the situation, The developer wants to remove this tree even though it is on the edge of the property. This 100ft canary pine is the only remaining protected tree left on the block. Its removal does not conform with Policy 7c in the City Land Use plans which encourages landscaping activities that employ techniques to minimize noise. The tree provides a barrier effect reducing point and line source noise levels and noise levels will only go up once it is removed. The tree must stay.

Our residents really want to understand the city process of our tree ordinance which allows this removal especially when we specifically asked our General Plan to include tree preservation? There are two other trees clustered next to the one tall protected tree to be removed and it doesn't make sense how they will be able to remain with the property line just a few feet from the remaining trees especially when design commission will not have a chance to scale back building to make sure they stay healthy. How will they dig the subterranean garage and build massive walls just feet away from the trees that are to remain? Will we see another Kaiser wrongdoing? In fact, we have protections in place for this but it through the design commission.

If the design commission first had the opportunity to see how the development could be altered and minimized to save these trees as it says in our protection policy, we might see a completely different project. After these concessions are given though, you have put the design commission in a corner. They cannot save the tree by giving more incentives to the developer with height or reduced garden requirements because the project is already out of scope of the General Plan. The design commission has to choose between two evils to remove the last protected tree on the block or go even bigger which will not be consistent with our General Plan. What a mess.

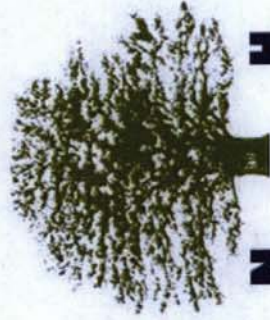
Not only did the city approve the removal of all trees at 399 Del Mar, see how the neighboring trees have been cut back to the point of no return?

I wonder what will happen to the oak looming over at 399 East Del Mar? I can't imagine this is going to go well.

When applied correctly and consistently with its purpose, the California Environmental Quality Act gives communities the opportunity to provide input on how development will impact their neighborhoods. No other state law guarantees a seat at the table for disadvantaged communities and historic communities in land use decisions which impact their health, their future, and their neighborhood.

So when we are concerned about elevated pollution exposure from idling cars and diesel trucks only feet away from a kitchen window and traffic noise levels beyond what is acceptable which can make housing unlivable, displace residents, and destabilizing communities, we turn to CEQA.

**M A D I S O N H E I G H T S
N E I G H B O R H O O D A S S O C I A T I O N**



Appeal of Hearing Officer Decision

AHCP #11869

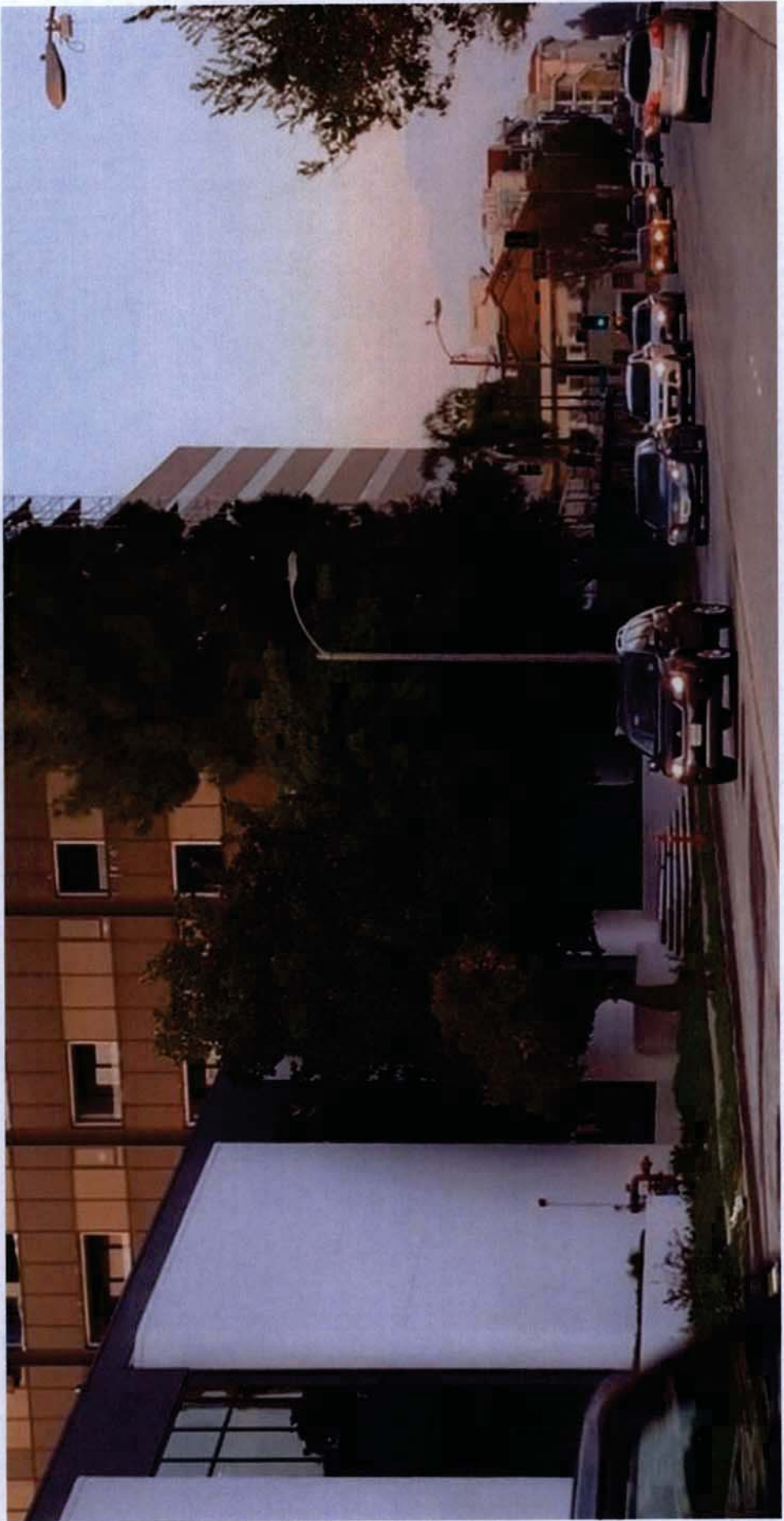


Protecting the character of our neighborhood





**MADISON HEIGHTS
LANDMARK DISTRICT**





2 of 16



Design Comments

Planning & Community Development Department

- Preliminary Consultation with Design Commission:
 - Massing
 - Neighborhood Context
 - Pedestrian Engagement
 - Building Wall Articulation
 - Quality of Material

Design Commission
Preliminary Consultation – 253 South Los Robles Avenue
June 13, 2017
Page 2 of 4

Applicable Design Guidelines:

- The applicable design guidelines are the design-related goals and policies in the Land Use Element of the General Plan and the Design Guidelines in the Central District Specific Plan.

Previous/Existing Entitlements:

Predevelopment Plan Review (PPR). A PPR comment letter was provided to the applicant on July 20, 2016. The project does not meet the threshold for City Council PPR review.

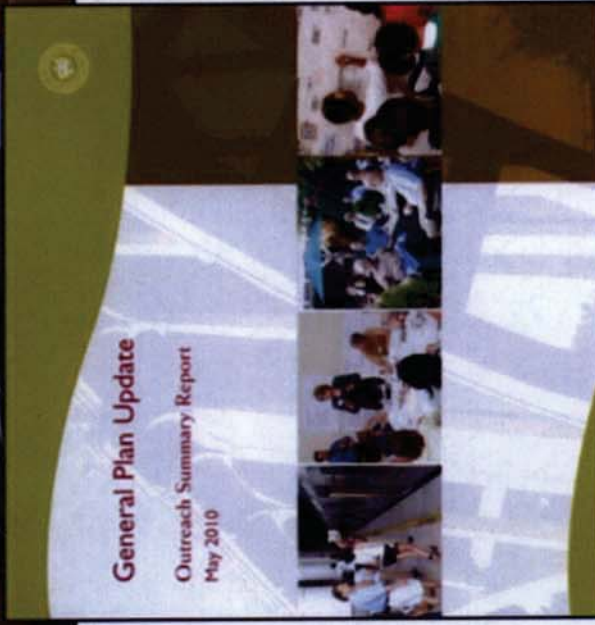
Approvals needed/project scheduling:

- Predevelopment Plan Review (City Council, information only)
- Affordable Housing Concession Permit (Zoning Hearing Officer)
 - FAR
 - Height
- Concept and Final Design Review (Design Commission)
- Building Permits (Building Staff)





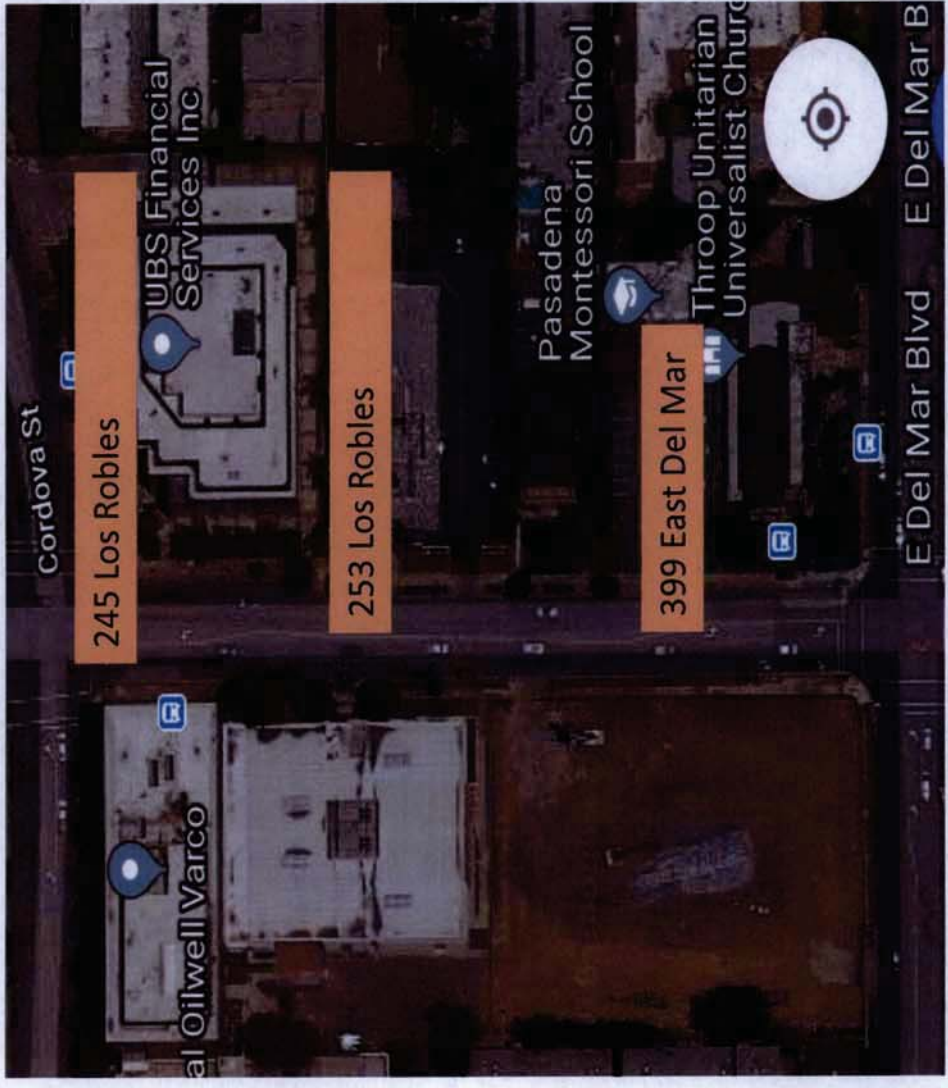
**2009 &
Spring 2010
Identifying
the
Issues
Phase I
Outreach**



**The exemption of Class 32 urban
infill found in CEQA Guidelines
Section 15332, which is being
used today, is available if the
project is consistent with
applicable general plan
designation and zoning, and does
not have any significant effects
relating to traffic, noise, and other
environmental concerns.**



URBANIZE
LOS ANGELES



Cordova St

245 Los Robles

UBS Financial Services Inc.

253 Los Robles

Pasadena Montessori School

399 East Del Mar

Throop Unitarian Universalist Church

E Del Mar Blvd







**253 SOUTH LOS ROBLES AVENUE MULTI-FAMILY
PROJECT**

CEQA Class 32 Categorical Exemption Report

Prepared for
City of Pasadena
175 N Garfield Avenue
Pasadena, CA 91101

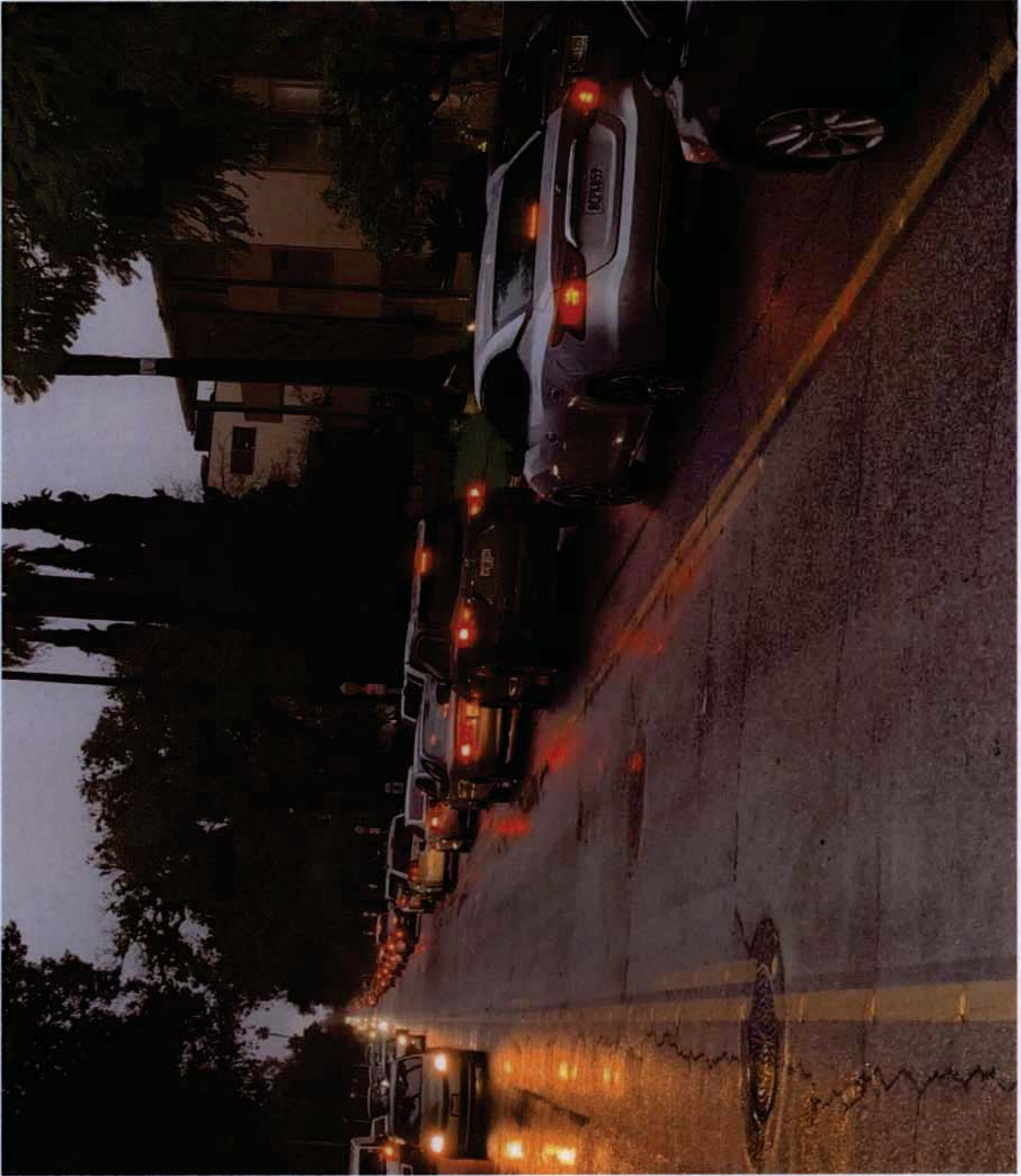
August 2018



II. Noise

The following review of potential noise impacts is based on the Noise Technical Report prepared by ESA (included as **Attachment C** of this report) for the proposed Project. In accordance with Appendix G of the State *CEQA Guidelines*, the proposed Project would result in potentially significant impacts related to noise if it would result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project; or
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.



2.1.1 City of Pasadena Noise Element of the General Plan

The Noise Element of the General Plan is primarily used by the Planning and Community Development Department as a guideline for siting noise sensitive land use land uses in the vicinity of preemptive noise sources unless adequate noise abatement is incorporated into the encroaching development. The City of Pasadena Noise Element contains a noise compatibility matrix that shows acceptable and unacceptable ranges of noise for various land uses. The noise compatibility matrix is shown in **Table 3, City of Pasadena Guidelines for Noise Compatible Land Use**, (appears as **Figure 1** in the City's Noise Element).⁹

**TABLE 3
CITY OF PASADENA GUIDELINES FOR NOISE COMPATIBLE LAND USE**

Land Use Category	Community Noise Exposure <i>L_{dn}</i> or CNEL, dBA											
	55	60	65	70	75	80	85					
Residential – Low Density Single Family, Duplex, Mobile Homes												
Residential – Multi-Family and Mixed Commercial/Residential Use												
Transient Lodging – Motels, Hotels												
Schools, Libraries, Churches, Hospitals, Nursing Homes												
Auditoriums, Concert Halls, Amphitheatres												
Sports Arena, Outdoor Spectator Sports												
Playgrounds, Neighborhood Parks												
Golf Courses, Riding Stables, Water Recreation, Cemeteries												
Office Buildings, Business Commercial and Professional												
Industrial, Manufacturing, Utilities, Agriculture												



CONDITIONALLY ACCEPTABLE: If new construction or development proceeds, an analysis of the noise reduction requirement should be made and needed noise insulation features included in the design.

NORMALLY UNACCEPTABLE: New construction or development should generally not be undertaken, unless it can be demonstrated that an interior level of 45 dBA can be achieved.



TABLE 1
SUMMARY OF AMBIENT NOISE MEASUREMENTS

	Location, Duration, Existing Land Uses and, Date of Measurements	Measured Ambient Noise Levels ^a (dBA)
R1	2/7/18 (8:30 a.m. to 8:45 a.m.) Wednesday	58.8
R2	2/7/18 (9:39 a.m. to 9:54 a.m.) Wednesday	69.4
R3	2/7/18 (9:23 a.m. to 9:38 a.m.) Wednesday	67.0
R4	2/7/18 (8:47 a.m. to 9:02 a.m.) Wednesday	51.7
R5	2/7/18 (9:05 a.m. to 9:20 a.m.) Wednesday	68.8

^a Detailed measured noise data, including hourly L_{eq} levels, are included in Appendix A.

SOURCE: ESA 2018.

**TABLE 2
EXISTING ROADWAY NOISE LEVELS**

Roadway Segment	Calculated Traffic Noise Levels along the Roadway dBA CNEL
Cordova St between Marengo Ave & Euclid Ave	67.2
Cordova St between Euclid Ave & Los Robles Ave	67.6
Cordova St between Los Robles Ave & Oakland Ave	68.1
Marengo Ave between Del Mar Blvd & California Blvd	68.9
Los Robles Ave between Del Mar Blvd & California Blvd	67.9

SOURCE: ESA 2018.

Cordova Street Enhancements

If Cordova is so quiet already, why do we need a bike lane? Seems like a bike lane is more necessary on a street which is traveling at higher speeds and has higher vehicle trips.

The intent of the road diet is to manage speeds on Cordova Street and to enhance pedestrian safety crossings at un-signalized intersections. Cordova Street traffic volumes are well below volume capacities of a four-lane roadway leading to speeding by motorists. Repurposing a travel lane in each direction to a bike lane in an industry-standard strategy to manage speeds and improve pedestrians' safety.

TABLE 2
EXISTING ROADWAY NOISE LEVELS

Roadway Segment	Calculated Traffic Noise Levels along the Roadway dBA CNEL
➔ Cordova St between Marengo Ave & Euclid Ave	67.2
➔ Cordova St between Euclid Ave & Los Robles Ave	67.6
➔ Cordova St between Los Robles Ave & Oakland Ave	68.1
Marengo Ave between Del Mar Blvd & California Blvd	68.9
Los Robles Ave between Del Mar Blvd & California Blvd	67.9

SOURCE: ESA 2018.

Why was upper Los Robles and Del Mar not evaluated for the study?

Average daily traffic counts (ADT) collected in 2016 along access and neighborhood connector street types within the project vicinity are summarized as follows:

Street Segment	Existing ADT Volumes
Cordova Street between Marengo Avenue and Euclid Avenue	10,368
Cordova Street between Euclid Avenue and Los Robles Avenue	10,333
Cordova Street between Los Robles Avenue and Oakland Avenue	11,987
Marengo Avenue south of Del Mar Boulevard	15,719
Los Robles Avenue south of Del Mar Boulevard	12,869

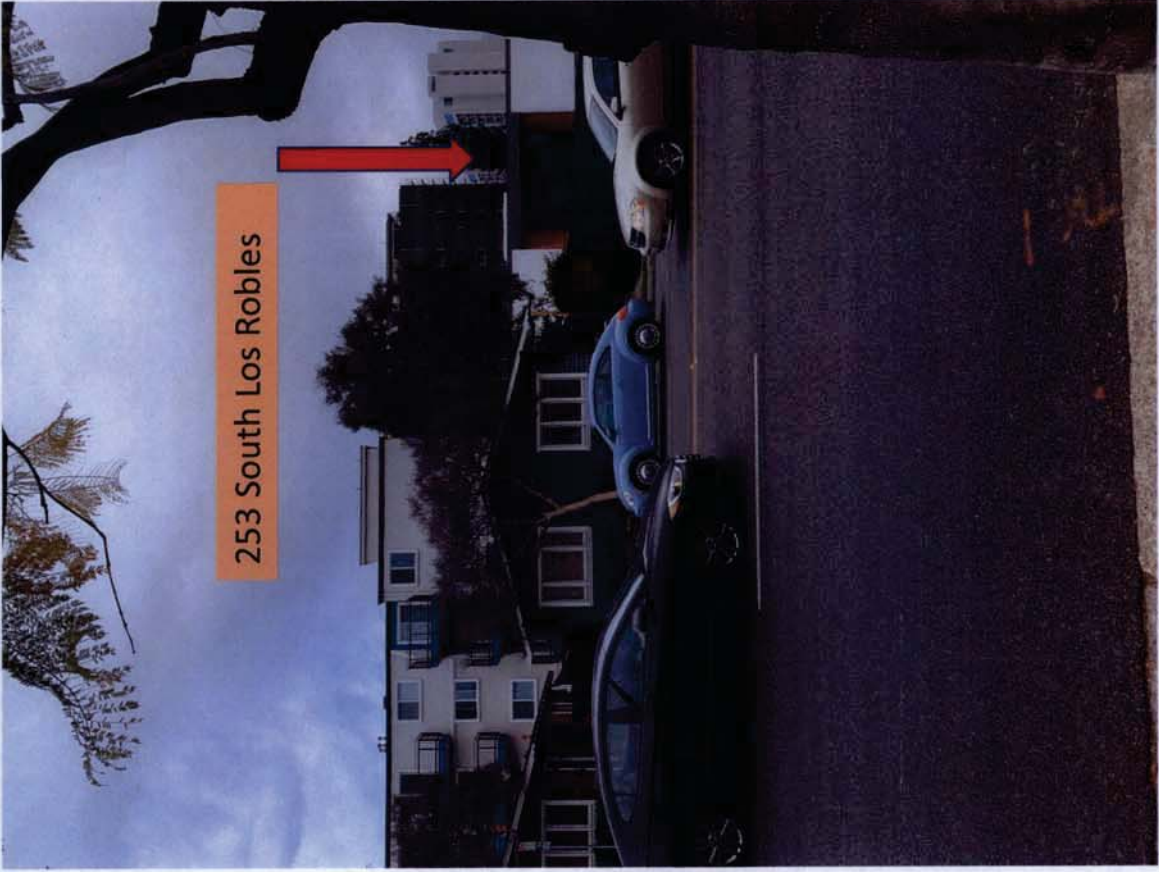
Evietina Transit Corridor

* Del Mar at Los Robles- 19,800

Los Robles at Colorado- 16,500

* Location of R2





253 South Los Robles

**TABLE 3
EXISTING TRAFFIC NOISE LEVELS**

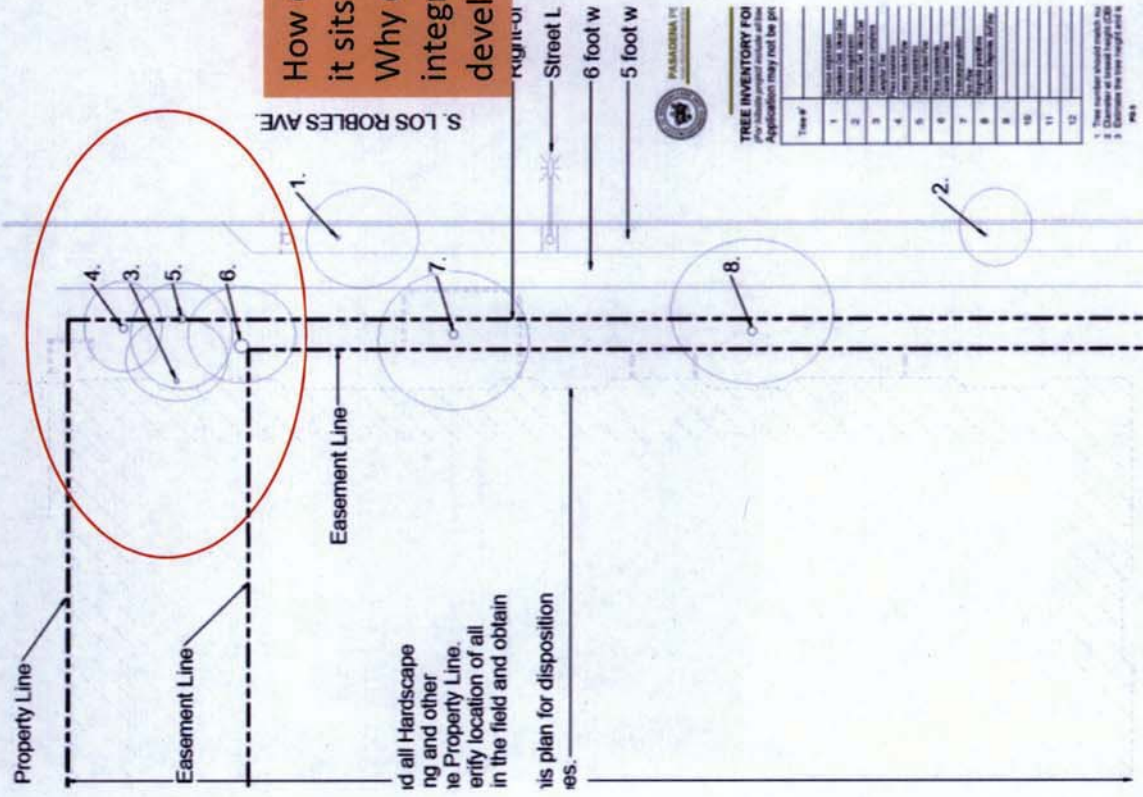
Roadway Segment	Surrounding Uses	L_{dn} at 100 Feet from Centerline of Roadway
Cordova Street		
Marengo Avenue to Euclid Avenue	Residential/ Commercial	57.6
Arroyo Parkway to Marengo Avenue	Residential/ Commercial	56.8
Euclid Avenue to Los Robles Avenue	Commercial	57.7
Los Robles Avenue to Oakland Avenue	Residential/ Commercial	58.7
El Dorado Street		
Los Robles Avenue to Oakland Avenue	Commercial	48.6
Oakland Avenue to Madison Avenue	Residential/ Commercial	43.6
Madison Avenue		
Green Street to El Dorado Street	Commercial	48.6
El Dorado Street to Cordova Street	Residential/ Commercial	48.5
Oakland Avenue		
Green Street to El Dorado Street	Commercial	48.5
El Dorado Street to Cordova Street	Residential/ Commercial	49.2

Note: Traffic noise levels were calculated using the FHWA roadway noise prediction model. Refer to Appendix A for noise modeling assumptions and results.

If proper and relative streets were to have been used in the study, the outcomes would have been very different. It makes us wonder if the ESA evaluation was catered to help the developer pass their project rather than protect current residence from a abhorrent lifestyle of living with traffic noise.



How can tree 4 and 5 remain when it sits so close to the easement line? Why do we not require developers to integrate tree 6 (protected) into the development?



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Applicable Design Guidelines:

- The applicable design guidelines are the design-related goals and policies in the Land Use Element of the General Plan and the Design Guidelines in the Central District Specific Plan.

Previous/Existing Entitlements:

Predevelopment Plan Review (PPR). A PPR comment letter was provided to the applicant on July 20, 2016. The project does not meet the threshold for City Council PPR review.

Approvals needed/project scheduling:

- Predevelopment Plan Review (City Council, information only)
- Affordable Housing Concession Permit (Zoning Hearing Officer)
 - FAR
 - Height
- Concept and Final Design Review (Design Commission)
- Building Permits (Building Staff)



“No project should be recommended as eligible for the In-Fill exemption until the Design Commission has made its final findings and determination regarding the project consistency with the General Plan guidelines. Here the process is reversed: the design commission only initially reviews an AHCP project with recommendations to be incorporated into the Concept Design Review submission for a later decision. But these evaluations are not pursued until after the AHCP is adopted, and if that adoption is predicated in a CEQA In Fill Exemption decision, it is by definition an inadequate or incorrect decision.” - Allen Matkins, April 1st 2019



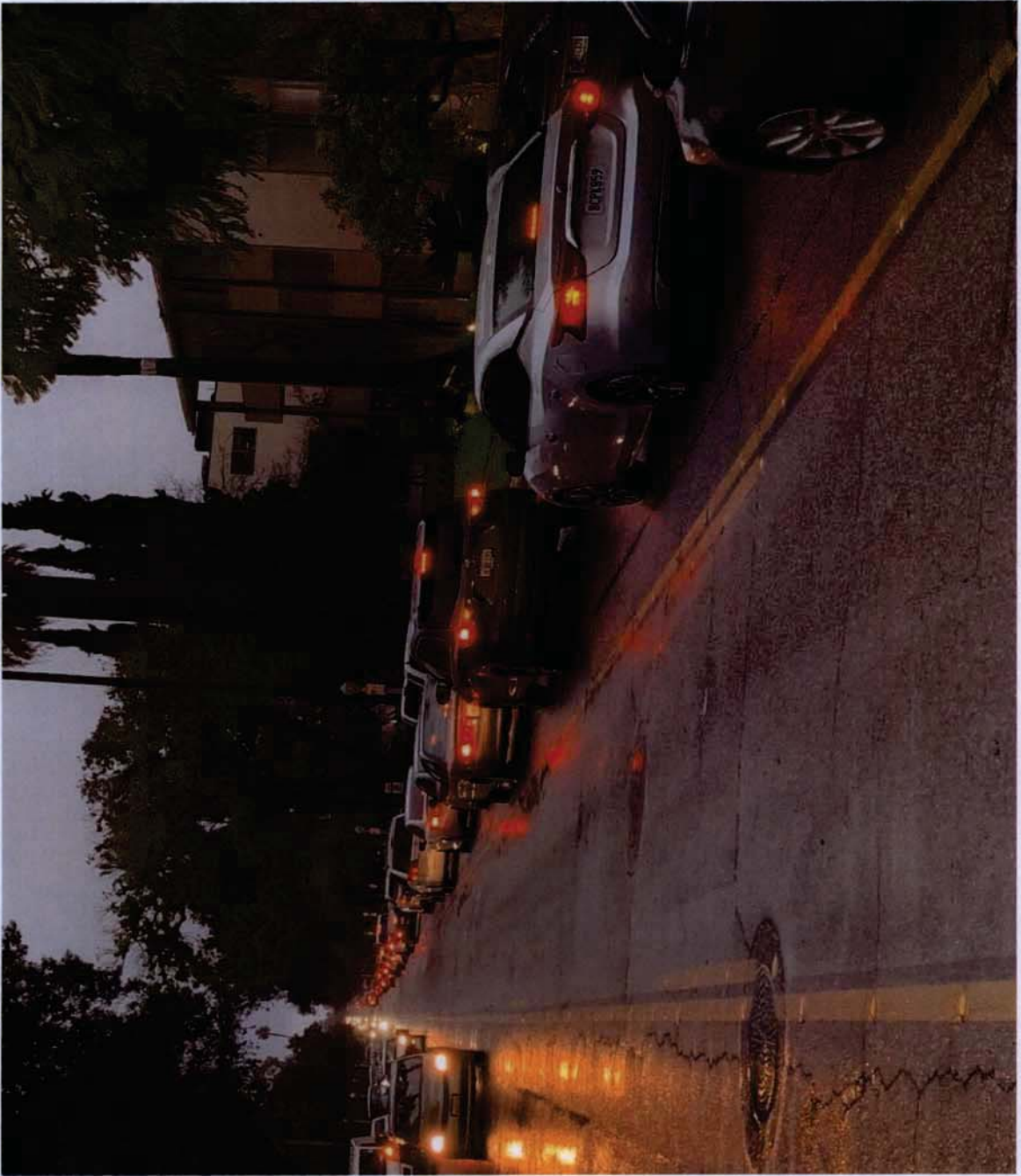
URBANIZE
LIFE PROJECTS



What will happen to this oak as they start building at 399 East Del Mar? See how it hangs over at least 20ft? What will they do? Our trees are being decimated.

“When applied correctly and consistently with its purpose, the California Environmental Quality Act gives communities the opportunity to provide input on how development will impact their neighborhoods. No other state law guarantees a seat at the table for disadvantaged communities and historic communities in land use decisions which impact their health, their future, and their neighborhood.” Ashley Werner, CALmatters

Because the project does not meet the criteria of In-Fill exemption, a complete CEQA analysis in the form of a Mitigated Negative Declaration or Environmental Impact Report, must be prepared before the project is approved.



Protecting the character of our neighborhood

