



HARVEST ROCK CHURCH

February 14, 2007

Mayor Bill Bogaard
117 E. Colorado Blvd., 6th Floor
Pasadena, CA 91105

Mayor Bogaard,

When I came to Pasadena 24 years ago to pursue a graduate education in theology at Fuller Seminary, I did not envision how much positive impact this community would have on me and my family. Pasadena's ethnic diversity, its commitment to host cultural events and its willingness to foster artistic expression, deepens our lives. It provides a wonderful learning environment for my children to both understand and appreciate the traditions and contributions of many cultures. We feel very fortunate to live in a community so dedicated to attracting world class offerings in every area of the arts.

Twelve years ago I had the opportunity to pastor one of the many wonderful churches here in our city. At that time our congregation was small, but dedicated to our mission; helping people make positive changes in their lives, serving our city, and reaching the nations. We never dreamed that acquiring the Ambassador Auditorium would become one way in which we would be able to give back to the city that has bestowed so many benefits on us. In 2004, when the Worldwide Church of God put the complex of the Ambassador, Administration Building, Student Center and all properties up for sale, we were able to form an LLC with Maranatha High School, and through them, indirectly with Sunrise, to purchase the complex and acquire Ambassador Auditorium.

I knew that from the mid-70's to the mid-90's, the Ambassador was the site for a steady stream of world renown musicians and performances and was respected by the entertainment world as the "Carnegie Hall of the West". When it closed and remained dormant in the mid-90's, Pasadena lost an important and beautiful center for the performing arts.

I scarcely had the keys in my possession when I was contacted by Joe and Alice Coulombe, Carol Henry and Jim Ellis, prominent art patrons here in Pasadena, representing an organization called Advocates for Ambassador Auditorium. The organization was formed to purchase, renovate and reopen the Ambassador to the arts, reestablishing it as a cultural center. However, they were unable to purchase the Auditorium because it was not offered for sale separately. They asked me if the church would consider reopening the Ambassador for concerts and other civic and cultural events. The church leaders and members strongly agreed that reopening Ambassador would be one way to serve our city and enrich the lives of our neighbors here in Pasadena.

With that goal in view, we have refurbished the Ambassador with the intent to preserve its integrity as a world class center for the performing arts. We have completely replaced and updated the sound and lighting systems, and installed television equipment that enables patrons to acquire DVDs of performances. We have spent well over a million dollars on these interior renovations as well as refurbishing the building exterior, the reflecting pool and surrounding grounds.

It has been our joy over the last 2 ½ years to have a variety of concerts, cultural and civic events here at the Ambassador. This includes repeated performances by all three major Pasadena orchestras, the LA Children's Chorus, the LA Chinese Chorale, civic events like the Pasadena Fire Department Graduation, meetings for large neighborhood groups and the West Pasadena Residents Association. Dream Works filmed a major performance scene in the Oscar nominated "Dream Girls" at the Ambassador. Further more, we are looking forward to hosting a concert by the Salvation Army Brass Band from New York. We continue to work on increasing our capacity to handle requests as we receive numerous inquiries from a variety of sources such as coronation ceremonies for the Rose Parade Queen and her court. We know these events increase the cultural visibility of the city as well as providing additional revenue, particularly to our business neighbors in Old Pasadena.

I am writing this letter to bring to your attention a situation which I believe could have a profound and permanent negative impact on the Ambassador Auditorium complex. The size and mass of the huge senior citizen assisted-living development by Sunrise Senior Living, Inc., will overwhelm the Ambassador complex and destroy its historic design. Leaders of Pasadena's three orchestras have voiced concerns about how the Sunrise project will affect access to the Ambassador and to parking for their patrons. These concerns could result in these opportunities going to other cities in the greater Los Angeles area, diminishing the arts here in Pasadena and siphoning off the additional business revenues generated by present art patrons.

Our desire is to maintain and preserve the Ambassador as a thriving cultural center for the arts. We believe that Sunrise would be a good neighbor and we welcome what will be a high-end, luxury condominium complex for senior citizens in Pasadena. We are not advocating that the Sunrise project go away, rather that the project design be reduced in mass and size to a level that is more appropriate to its location. I request your thoughtful consideration of the attached technical report which explains our concerns and contains proposed solutions to this situation.

I thank you for your time and attention to this important matter.

Dr. Ché Ahn
Senior Pastor

AMBASSADOR WEST EIR AND SUNRISE SENIOR LIVING
CONDITIONAL USE PERMIT

Harvest Rock Church submits these comments regarding the Ambassador West EIR and Sunrise Senior Living's application for a CUP for a life/care facility to come before you March 12.

We send this without having the benefit of seeing the Staff's Recommendations to the Council. References to Staff's Recommendations are those made to the Planning Commission at its January 10 meeting.

We refer you also to our letters submitted to TAC and the EIR consultants as part of the public comment phase on the EIR which are found in the EIR Chapter 8, letters 12, 14, 15, 16, 18, 22, and 25. While we submitted them as part of the EIR public comment phase, they apply more pointedly to Sunrise's application for a Conditional Use Permit to develop a life/care facility.

Statement of Facts

As part of the Ambassador West project, Sunrise Senior Living proposes to demolish the 79,426 square foot Ambassador Administration Building and replace it with a 339,000 square foot building ("lower campus Sunrise Building.") A proposed second 111,000 square foot building will bring the Sunrise project to 450,000 square feet, the size of the Del Mar Station project.

Sunrise Senior Living must receive a Conditional Use Permit to operate a life/care facility on this site.

Request

We ask the City Council to continue Sunrise's request for a Conditional Use Permit and give Sunrise guidance for a design and size of a lower campus building that will more closely match the scale of the general character of the neighborhood, giving highest priority to preservation of Pasadena's character and scale, including its traditional urban design form and historic character, and direct Sunrise to redesign the building and submit it to the Design Commission and return it to the Council.

Basic Position

1. The Ambassador Auditorium is Harvest Rock Church's home. It is also a Pasadena treasure, often called the Carnegie Hall of the West.
2. Harvest Rock Church joins other members of the community in support of the Ambassador West Project, including a Sunrise Senior

Living development that is compatible with the size, scale, and character of the Ambassador Auditorium and environs.

3. The Sunrise project cannot be bootstrapped by the balance of the Ambassador West project. Its application for a CUP must stand on its own and requires the City Council to consider the issue of the size and mass of the lower campus Sunrise Building separately from the merits of the entire Ambassador West project.
4. The lower campus Sunrise Building is incompatible in scale with the Ambassador Auditorium and the general character of the neighborhood in that Sunrise proposes to demolish the Administration Building and to replace it with a building 4 1/4 times its size, over three times the size of the Auditorium, and over three times the size of any other building in the area.
5. Harvest Rock believes that when the City Council examines the evidence and applies the facts to the requirements for a Conditional Use Permit to build a life/care facility, it will be unable to make the required findings of (A) conformance with the General Plan, (B) respect for adjoining properties, and (C) compatibility with the size, scale and character of the neighborhood.
6. The Ambassador West EIR finds two significant unmitigated environmental impacts caused by the size and mass of the Sunrise Buildings.
7. The massive 339,000 square foot lower campus Sunrise Building will dwarf the Ambassador Auditorium and will be a permanent part of Pasadena's landscape along Green Street at the entrance to the City.
8. The Sunrise CUP is a watershed issue. Residents have been told that Pasadena's policy is to target growth into the Central District and other commercial Specific Plan areas. Pasadenans trust their City to follow that policy. Sunrise presents us with a test of that policy in the form of a building on the Ambassador Campus that is significantly larger than most if not all developments in the Central District.
9. If the design and configuration of the lower campus Sunrise Building are not made compatible with the environs, Pasadenans will be shocked and dismayed at the result, no matter how attractive the balance of the project is.
10. Pasadena's long held policy has been to preserve the Ambassador Auditorium. Preservation is more than saving a building from demolition. Preservation makes it possible to use the building as it was intended. Harvest Rock Church has saved the Auditorium and is

attempting to preserve it as a church and as a world class performing arts venue. What is built adjacent to it can help or hinder that effort.

11. There is great competition among performing arts venues. A venue must be convenient and attractive. Its success depends greatly upon its surroundings and ambience. If it is inconvenient or unpleasant to attend an event, patrons will go elsewhere.

Summary

Sunrise's application for a Conditional Use Permit to build and operate a life/care facility should be denied as it is proposed.

1. **The use is not in conformance with the goals, policies, and objectives of the General Plan and the purpose and intent of the West Gateway Specific Plan, in particular General Plan Guiding Principle 2 that "Change will be harmonized to preserve Pasadena's historic character and environment," and its Objective 5. (PMC 17.61.050 H. 3)**

"The principle of harmonizing change and preserving the existing environment is of tremendous importance to Pasadena residents. Harmonizing change requires that new development and other physical alterations respect the existing character and scale of the city. Change and development must be accomplished in a fashion that enhances and blends with Pasadena's existing qualities, both physical and social. Regardless of style, new development should be carefully and sensitively designed."

"OBJECTIVE 5—CHARACTER AND SCALE OF PASADENA: Preservation of Pasadena's character and scale, including its traditional urban design form and historic character, shall be given highest priority in the consideration of future development." (Emphasis added)

2. **The use would be detrimental to the properties in the neighborhood, i.e., Ambassador Auditorium Complex. (PMC 17.61.050. H. 5)**

"Significant unmitigated impacts will occur...to the setting of the Ambassador Auditorium..."

Ambassador West EIR (ES-6)

"I believe that any new buildings constructed on or near Green Street and St. John Avenue should complement the entire Ambassador Auditorium Complex, preserving its formal integrity and status."

Victor Vener, Music Director,
California Philharmonic

3. The design, location and size of the proposed use would not be compatible with the existing and future land uses in the vicinity in terms of aesthetic values, character, scale, and view protection. (PMC 17.61.050. H. 6)

4. The size of the proposed lower campus Sunrise building is too great to be compatible with the height and scale of the general character of the neighborhood. (PMC 17.50.120 D. 3.)

The Sunrise lower campus building will overpower the Ambassador Auditorium. It cannot be compatible with the scale of the land uses in the neighborhood when it demolishes one of them, the Administration Building, and replaces it with a building 4 1/4 times its size. Taking it further afield, it will greatly exceed the size of the two remaining large buildings in the neighborhood, the newly approved condominium at 285 West Green (c. 101,000 square feet,) and the Wells Fargo Bank building (c. 88,000 square feet.)

Introduction

The size of the Sunrise Building will dwarf the Ambassador Auditorium and will do violence to the scale and character of this neighborhood.

Sunrise would demolish the Administration Building and replace it with a 339,000 square foot building. (lower campus Sunrise Building)

The building of the size Sunrise proposes on this site outside the Central District will shock and disappoint Pasadenans' expectations of where large development should take place in their city. Not only is it larger than all the buildings immediately surrounding it, it will be larger than most of the recent projects in the Central District:

Sunrise Lower Campus	339,000 square feet;
Total Sunrise Project	450,000 square feet;
Del Mar Station	480,000 square feet;
IndyMac Bank Center:	235,000 square feet;
Western Asset Plaza:	270,000 square feet;
Montana 1:	235,000 square feet;
Trio Mixed Use:	360,000 gross square feet of new construction.

The lower campus Sunrise Building will be:

- 2.69-3.8 times the footprint of the Ambassador Auditorium (62,039 v. 23,040 at outside columns; 16,128 at outside walls);

- 3 1/2 times the footprint of the Administration Building (62,039 v. 18,046);
- 4 1/4 times the square footage of the Administration Building (339,000 v. 79,426);
- 208 feet longer than the Ambassador Auditorium (400 v. 192 at outside columns);
- 220 feet longer than the Administration Building (400 v. 180);
- 15 feet taller than the Administration Building (70 v. 55);
- 71,000 square feet larger than the combined size of the Administration Building, Wells Fargo Bank building, and the recently commenced condominium at 285 West Green.

Why should we care about the size of what goes on this site?

“The development would result in increased density and massing in the northeastern portion of the site as it would change the primarily open landscaped character of this area to a modern high-density residential community.” (EIR 3.1-13)

The proposed building will be grossly outsized for the area, beyond what anyone expects to find here. It represents a significant change of the City’s landscape. Its presence outside the Central District will shock Pasadenans and will raise fears that it will be a precedent for neighborhoods elsewhere in Pasadena that adjoin the CD or commercially zoned Specific Plan areas.

A new building on this site must respect the great architectural and cultural value of the Ambassador Auditorium.

“Preserve the high quality atmosphere that is the hallmark of this area, through complementary, well-designed, appropriately scaled buildings and landscaping.”

West Gateway Guiding Principles

“Competition from other venues requires that we pay attention to the Auditorium.... For Southern California concertgoers, the evening’s total ambience is important; acoustics and beauty, as well as ease of parking and access all play important parts in the success of a venue.”

Victor Vener

Music Director, California Philharmonic

" Ambassador Auditorium...is renowned for its acoustics, and is arguably one of the great concert halls in the United States...It is the architectural centerpiece of Ambassador College and is well known by the general public...."

Ambassador West EIR, Figure 3.4-10

" The Ambassador plaza and grounds was an ideal location for our gala fundraiser and concert there in September 2005 because of the open but protected design, the convenient parking, and the remarkable aesthetic setting."

John Hancock, Executive Director,
Pasadena POPS Orchestra

"The City of Pasadena is blessed to have a jewel of a performance venue in Ambassador Hall. When the Pasadena Symphony officially reopened the Ambassador in 2004, we found the Hall to be as magnificent as ever."

Jorge Mester, Musical Director
Tom O'Connor, Executive Director
The Pasadena Symphony

Discussion of the failure of the lower campus Sunrise Building to meet the requirements for a Conditional Use Permit

1. The lower campus Sunrise Building is not in conformance with the clearest of all Pasadena General Plan Guiding Principles

Rather than cite a list of General Plan Principles, Objectives, and Policies, we cite just General Plan Guiding Principle 2 and its relevant Objectives and Policies and apply them to the Sunrise CUP request.

It should be noted that this Principle and its Policies are designed to guide and shape development, not to stop it. Harvest Rock Church does not seek to stop the Sunrise project. It seeks a lower campus Sunrise Building that adheres to this Guideline and its Objectives and Policies.

Guiding Principle: Change will be harmonized to preserve Pasadena's historic character and environment.

"The principle of harmonizing change and preserving the existing environment is of tremendous importance to Pasadena residents. Harmonizing change requires that new development and other physical alterations respect the existing character and scale of the city. Change and development must be accomplished in a fashion that enhances and blends with Pasadena's existing qualities, both physical and social. Regardless of style, new development should be carefully and sensitively designed."

OBJECTIVE 5—CHARACTER AND SCALE OF PASADENA: Preservation of Pasadena's character and scale, including its traditional urban design form and historic character, shall be given highest priority in the consideration of future development. (Emphasis added)

Objective 5 is a mandate. It is not a comparative or a balancing statement. It is the clearest, least compromising statement of intent in the entire General Plan. We cannot simply ignore or wish this Objective away. It controls the whole project.

Each of the ensuing Policies speaks directly to the size and scale of the lower campus Sunrise Building.

Policy 5.1—Urban Design Principles: Apply citywide urban design principles to complement the scale and quality of the best of our architectural and urban design traditions.

Policy 5.3—Character and Identity: Urban design programs, including principles and guidelines, shall reinforce the city's unique character, scale and identity.

Policy 5.4—Neighborhood Character and Identity: Urban design programs, including principles and guidelines, shall recognize, maintain and enhance the character and identity of existing residential and commercial neighborhoods.

Policy 5.5—Architectural and Design Excellence: The City shall actively promote architectural and design excellence in buildings, open space and urban design and shall discourage poor quality development.

Policy 5.6—Human Values: Future development should reflect concern for the well being of citizens—for workers, visitors, neighbors and passersby—and should embody the cultural values of the community; it should be accommodating, inspiring, inviting, and enduring.

Policy 5.7—Enhanced Environment: development should be shaped to improve the environment of the public; it should support the distinctiveness of the locality and region as well as the special characteristics of the existing fabric of the site's immediate surroundings.

Policy 5.9—Contextual and Compatible Design: Urban design programs shall ensure that new development shall respect Pasadena's heritage by requiring that new development respond to its context and be compatible with the traditions and character of Pasadena, and shall promote orderly

development which is compatible with its surrounding scale and which protects the privacy, and access to light and air of surrounding properties.

Policy 5.10—Spatial Attributes: Promote development that creates and enhances positive spatial attributes of major public streets, open spaces cityscape and mountain sight lines and important “gateways” into the City.”

The Sunrise Project does not fulfill the West Gateway Specific Plan Overall Principle.

“Balance the principles of economic development, historic preservation and culture in order to optimize each and thereby achieve the goal of implementing the General Plan in the West Gateway area of Pasadena.”

The overall principle contains three basic principles, and the operative word is “optimize,” which contemplates compromise and getting less than you want. This is different from “maximize,” which connotes getting all you can.

By proposing a building of its size, Sunrise would maximize economic development at the expense of historic preservation and culture. To build 200 market rate condominiums, Sunrise seeks 209,000 square feet of development rights through a Transfer of Development Rights. The resulting building will dwarf and seriously disrupt the setting of the Ambassador Auditorium, a symbol of Pasadena’s cultural values, and the architectural centerpiece of the campus.

2. The lower campus Sunrise Building will be detrimental to property in the neighborhood, i.e., the Auditorium.

We cannot improve on the words of Pasadena’s orchestra leaders.

“One of the extraordinary features of the complex is the park-like atmosphere that will be lost with the planned encroachment of large buildings.”

Jorge Mester, Music Director and Tom
O’Connor, Executive Director, The
Pasadena Symphony

“We strongly recommend that the aesthetic and functional strengths of the Auditorium and its environs be preserved, through your prudent attention to the operational and aesthetic implications of the development under consideration.”

John Hancock, Executive Director, The
Pasadena POPs Orchestra

The EIR clearly sets forth how the lower campus Sunrise Building would be detrimental to the Ambassador Auditorium.

"...(t)he displacement of a building constructed in the same era as the Auditorium and its different design characteristics and materials that would be used for the proposed Senior Life Care Facility would alter the immediate surroundings of the Ambassador Auditorium and reflecting Pool to such an extent that the significance of the historical resource would be materially impaired."

EIR Chapter 3.4 Historical Resources,
pages 3.4-40-42

3. The design and size of the lower campus Sunrise Building will not be compatible with the existing and future land uses in the vicinity in terms of aesthetic values, character, scale, and view protection, nor will it be compatible in scale with the general character of the neighborhood.

The figures at pages four and five of this submittal illustrate the incredible disparity in size between the lower campus Sunrise Building and the Ambassador Auditorium, the Administration Building, neighboring buildings and even recent developments in the Central District. These astounding comparisons lead to the unavoidable conclusion:

- The size of the proposed lower campus Sunrise building is so great that it is incompatible with land uses in the vicinity in terms of character, scale, and view protection. (PMC 17.61.050)
- The proposed structures will not be compatible in scale with the general character of the neighborhood, *i.e.*, the Ambassador Auditorium Complex, and therefore cannot be granted a CUP for a life/care facility. (PMC 17.50.120 D. 3.)

The central issue under PMC 17.61.050 and PMC 17.50.120.D. 3, is the "vicinity" and "neighborhood" and is the Sunrise Building compatible with size, scale and general character of the "vicinity" or "neighborhood."

Harvest Rock Church believes that the character and scale of the neighborhood should be determined by the three buildings that have stood as the Ambassador Auditorium Complex for over 40 years.

With great respect for the Staff, their recommendation to the Planning Commission, found on Page 6, is wrong on two fronts: (A) what the "vicinity" or "neighborhood" is and (B) the buildings designated as determinative of the proper scale of the area.

- First, Staff's recommendation would have us consider Colorado Boulevard to be in the "vicinity" or "neighborhood" and therefore relevant to this decision.

- Second, Staff would have us decide that the Wells Fargo Bank building, the proposed condominium at 285 West Green Street, plus the to be demolished Administration Building, justify the construction of a 339,000 square foot building.

Common sense and the naked eye tell us that this is manifestly wrong.

The Ambassador Auditorium is the "architectural centerpiece" of the Ambassador campus, and is flanked by the Administration Building and the Student Center, creating a New Formalistic complex known as the Ambassador Auditorium Complex. Most people would consider the Ambassador Auditorium Complex to be the prime determiner of the scale of the neighborhood, because it is the neighborhood.

The Ambassador Auditorium Complex is sufficiently identifiable and important that the EIR finds that the lower campus Sunrise Building will have a significant negative environmental impact on it, "because of the change in setting caused by the loss of the Administration Building, which contributes to the setting of the historical resource." (EIR p. 3.4-52)

Though the Complex is the best determiner of the area, one may argue that the vicinity and neighborhood is the entire Ambassador Campus, a self contained community, with a history and character of its own comprised of elegant old homes and more modern structures architecturally integrated to create a distinct whole. The largest of these mansions, the Merritt Mansion, is just over 13,000 square feet.

However, Staff goes even further afield and includes the commercial area along Green Street and Colorado Boulevard in the "vicinity" and "neighborhood" of the Ambassador Auditorium.

Logic cannot be stretched this far.

Though it is a block away, we doubt that anyone feels that the Wells Fargo Bank building is part of the Ambassador "neighborhood." Conversely, if you are on the Ambassador campus, you don't for a minute believe you are in the Wells Fargo Bank building "neighborhood."

The Wells Fargo Bank building and the impending condominium complex are unrelated architecturally to the Ambassador Auditorium Complex, they exist independently of and without reference to any portion of the Complex, and as a Planning Commissioner said, it is sophistry to argue that they are part of the "Ambassador neighborhood."

Green Street is a clear, distinct dividing line between the commercial area to the north and Ambassador College's residential/institutional neighborhood to the south and west. They are different neighborhoods,

with different purposes and character. Understanding this, the West Gateway Specific Plan separates the zoning of these areas, with WGSP 1A and 1B regulating the Ambassador Campus and WGSP 1C regulating the area on Green Street and Colorado Boulevard.

Rather than supporting the lower campus Sunrise Building's size, Staff's Recommendation argues for a building of 100,000 square feet.

As discussed above, Staff's Recommendation to the Planning Commission, at page 6, rationalizes the lower campus Sunrise Building's massive size by saying that it will be compatible with development on the north side of Green Street and on Colorado Boulevard.

In fact, this suggests the opposite. If one accepts this comparison, it is even more clear that the lower campus Sunrise Building must be made smaller if it is to match the scale of and be compatible with the buildings in the vicinity and neighborhood.

- Taken together, the Administration Building, the Wells Fargo Bank building, and the new 285 West Green condominium complex have a square footage of roughly 268,000 square feet, or 71,000 fewer square feet than the size of the Sunrise Building.
- The average square footage of the three buildings is 89,475, which argues for a lower campus Sunrise Building of 100,000 square feet at most.
- Harvest Rock is less concerned with the upper campus Sunrise building. However, taken together, the two Sunrise buildings are 450,000 square feet, as large as the Del Mar Station project. Within a block of Orange Grove Avenue! Within a block of West Del Mar! Next to the Ambassador Auditorium! Outside the Central District!

The EIR got it right.

"...the scale and massing of the senior life/care component is large relative to the adjacent Ambassador Auditorium... and pedestrian usage of Green Street and mitigation is required to further determine how the project best fits with its surroundings." Table 3.7-1 Page 3.7-31

We cannot escape this! The lower campus Sunrise Building will dwarf the Ambassador Auditorium and is not compatible with the area surrounding it.

Proposing a building within Zoning Code maximums does not assure approval of a Conditional Use Permit.

We address here what seems to have become the conventional opinion about this project.

1. The Sunrise buildings are permitted because the West Gateway Specific Plan's policy is for "smaller scale" development to be placed to the south and west of the site and at a "larger scale" at the northeast corner.
2. The Sunrise buildings together are under the 48 du/acre limit and the 72 foot height limit of the West Gateway Specific Plan, and therefore approval of a CUP is a mere formality.

These facts are correct, but their conclusions are wrong, and they make only half the case. The other half is the impact of the development on the Ambassador Auditorium Complex and views from Green Street.

The provision for development at a "larger scale" to be placed on the northeast corner of the campus is a statement of comparison. It is not an absolute right to build a building that does not otherwise respect or fit the historic scale of the property or adjoining buildings. In fact, "larger" development—the Administration Building and the Ambassador Auditorium, has stood on the corner for over 40 years. The West Gateway Specific Plan does not say that "larger" development can be over 4 times the size of what now stands there.

The lower campus Sunrise Building's being "within the envelope" of 48 du/acre and 72 feet, is not an entitlement but a precondition to being granted a CUP. Its size must be within the envelope, but it must also be compatible with the scale of the existing neighborhood.

Pasadena has become more urban over the last decade, primarily because of the development boom in the Central District. This growth in the Central District is in keeping with the General Plan. However, a project of this size, outside the Central District, a half block from South Orange Grove, one block from West Del Mar, and next to the Ambassador Auditorium, is simply not in keeping with Pasadena's vision, heritage and character.

Some say that the lower campus Sunrise Building is a necessary price to pay for the preservation of significant parts of the upper campus to the south and west.

This is a false and improper choice. It is false because most of the homes and the gardens, paths, streams and lawns will never be developed. Nothing need be "traded" for their preservation. It is improper because it would have Pasadena trade off required findings for a CUP.

Tradeoffs are a part of every project. The question is whether we give up too much for what we get.

Recent "tradeoffs" illustrate the point. Vista del Arroyo bungalows were restored in exchange for the right to build the homes beneath the Colorado Street Bridge. Recently there has been a proposal to build self-storage under the Edison right-of-way in exchange for a park and hiking trails. Not everyone is pleased with these arrangements.

You can't trade off required findings. The facts are the facts. The requirements to receive a Conditional Use Permit are well known. We can't ignore or wish away these clear findings and bargain away the north east corner of this site to an applicant who has come here with eyes wide open.

Sunrise must receive a Transfer of Development Rights to build a 339,000 square foot lower campus Sunrise Building. The results will be harmful and the benefits illusory.

The West Gateway Specific Plan provides for a process to Transfer Development Rights (TDR) to a receiving site, to equalize development rights on the campus. In this case, the transfer is intended to allow an outsized building three times larger than could be built without the additional rights. It is only with a Transfer of 209,066 square feet of Development Rights, equal to the size of several new developments in the CD, that Sunrise can seek to build the lower campus building of the 339,000 square feet it desires.

TDR's are private agreements. The City may approve them but is under no obligation to give them effect if to do so would result in a project that is incompatible with the neighborhood. The ordinance requires that the resulting development on the receiver site be within the height and density limits of the zone, but it must also "meet the requirements of this chapter." Thus, it must fit the mass and scale of the neighborhood.

TDR's can also be used to protect historic properties from future development. However, in this case, the public benefit is illusory. Sunrise proposes to receive 66,785 square feet of development rights from gardens and waterways, including the Great Lawn. These properties will never be developed under any circumstances, and the City should give them no effect.

In particular, 30,207 square feet of the 66,785 square feet of development rights are to come from the Great Lawn. Ambassador West proposes to give the Great Lawn to the City for public use, in exchange for a waiver of the Residential Impact Fee. If this is done, there are no development rights in the Great Lawn to transfer to the receiver site, and the City should give them no effect.

There is a larger policy issue involved. Should Pasadena permit a building of 339,000 square feet (accompanied by a building of 111,000 square feet) to be built outside the Central District?

Pasadenans have been told to expect growth to be in the Central District and commercial Specific Plan areas, as set forth in the General Plan. Though the public has shown great concern over this growth, it trusts and expects that it will be limited to those areas.

The proposed lower campus Sunrise Building on this site will shock and disappoint that expectation. Not only is it larger than all the buildings immediately surrounding it, it will be larger than most of the recent projects in the Central District:

Sunrise Lower Campus	339,000 square feet;
Total Sunrise Project	450,000 square feet;
Del Mar Station	480,000 square feet;
IndyMac Bank Center:	235,000 square feet;
Western Asset Plaza:	270,000 square feet;
Montana 1:	235,000 square feet;
Trio Mixed Use:	360,000 gross square feet of new construction.

From a citywide policy perspective, there must be a clear demarcation between the Central District and the rest of the City. Larger zoning densities can't be allowed to spill into the less dense area adjoining them, to enlarge the scale of the area by that single act. Such "density creep" would rob the General Plan and the Zoning Code of meaning.

The City Council has recently acted to protect lower intensity areas from intrusion by higher density developments on South Lake backing up to Hudson, in the Allendale area, in southeast Pasadena near Vinedo and San Gabriel Boulevard, and on North Allen near Brigden.

The same principle should apply in this matter, and the proper way to approach it is to look to the only three buildings that have stood on the Ambassador Campus for 40 years and their immediate surroundings on the campus itself, and direct the applicant to design a Sunrise building that complements and does not overpower them.

Solutions

Can the Negative Impacts be "Designed Away?"

The EIR states that "significant unmitigated impacts will occur...to the setting of the Ambassador Auditorium." Surface treatment cannot design away its impact on the Auditorium.

To determine the kind of design required, we must ask "how should we treat this Pasadena treasure, the Carnegie Hall of the West?"

The best judges of the impact of the lower campus Sunrise Building on the Ambassador Auditorium are the performers who use the Auditorium. Ivo Pogorelich, pianist from the former Yugoslavia, who held a piano competition at the Ambassador, said about the Auditorium:

"...Ambassador Auditorium, one of the nicest concert halls in the world; (a place) to come not to give a performance, but to bring out an artistic creation. Even when you approach the hall, the beauty of its architecture and setting already encourages you to exceed your expectations."

This was a decade ago. Today, leaders of Pasadena's orchestras agree and make their feelings clear that the lower campus Sunrise Building would negatively impact the "beauty of (the Auditorium's) architecture and setting" that Mr. Pogorelich felt so strongly about and could threaten its position as a premier performing arts venue.

Some surface design might ameliorate the effect to a slight degree. However, the Ambassador Auditorium is noted not only for its interior and acoustics, but also its architecture, setting, plaza and fountains. The size of the proposed building simply overpowers the Auditorium Complex.

What would be a reasonable size?

It is not enough for Harvest Rock Church simply to say the lower campus Sunrise Building is too large and leave it at that.

A West Gateway Guiding Principle provides that new development is to "preserve the high quality atmosphere that is the hallmark of this area, through complementary, well-designed, appropriately scaled buildings and landscaping." The lower campus Sunrise Building must be made smaller and less monolithic.

Both Sunrise buildings obstruct views into the property from the north and northeast, and the Lower Campus building upsets the historic and architectural setting of Pasadena's Ambassador Auditorium.

What size buildings would meet General Plan Guiding Principle 2 and its Objectives and Policies? What kind of design would mitigate its negative environmental impacts? What kind of design would allow the findings of compatibility required by PMC 17.61.050 and PMC 17.50.120?

A. The Council should demand the same care in the design of the Sunrise Buildings that you gave to the design of the new conference and convention buildings flanking the Civic Auditorium.

B. The Council should give no effect to Development Rights transferred from sites such as gardens and streams that will never be developed under any circumstances.

C. The Council should require Sunrise to honor the West Gateway Specific Plan Design Guidelines that require new development to respect the scale of adjoining buildings and the character of the area.

D. The Council should consider objective guidelines.

- Determine the height, square footage and footprint of each of the larger buildings in the area;
- Compare their size to that of the lower campus Sunrise Building;
- Determine the average size of the largest buildings in the area;
- Compare the Sunrise building to that average;
- Compare the size of the lower campus Sunrise Building to the Auditorium and the existing Administration Building.

E. Let your own eyes give life to the square footage numbers. We ask you to drive or walk by IndyMac, Montana 1, Western Asset Plaza, Trio Mixed Use, and the Del Mar Station projects. Visualize any of these projects on this site, remembering that the first three are 2/3 the size of the lower campus Sunrise Building, Trio is the size of that building, and the Del Mar Station project is the size of both Sunrise Buildings.

F. Harvest Rock asks the City Council to direct the applicant to submit a design that

1. will produce a lower campus Sunrise Building that is compatible with the existing and future land uses in the vicinity in terms of aesthetic values, character, scale and view protection;
2. is compatible in style, height and scale with the general character of the neighborhood;
3. does not create negative environmental impacts; and
4. gives highest priority to preservation of Pasadena's character and scale, including its traditional urban design form and historic character.

Pasadena Deserves Better; Sunrise Can Do Better

Pasadena has worked long and hard to achieve a great project on the Ambassador campus, and they have succeeded for the most part. The lower campus Sunrise Building is a glaring exception. Pasadena deserves better than the Sunrise proposal. Sunrise can do better than this proposal.

Dear Mayor and the City Council Members of Pasadena,

We strongly oppose the Sunrise Senior Living, Inc., project that is proposed for construction built next to Harvest Rock Church (HRC). The project's size and density is simply too large and overwhelming for HRC, and would impede its outreach to the community.

Please take measures to support Harvest Rock Church in this endeavor. HRC (as do all area churches) contributes significant cultural and economic investment to the City of Pasadena every day by employing Pasadenans, contracting with Pasadena firms, and with parishioners who patronize Pasadena businesses - restaurants, shopping districts, and more - following church services.

Please consider decreasing the building's mass significantly to better align with its immediate neighbors that include HRC. Or consider moving some of its massive square footage to the northwest side of the development, so Harvest Rock Church may continue to fully serve the greater Pasadena community.

Thank you.

CHURCH NAME AND ADDRESS: HARVEST ROCK CHURCH 131 SOUTH ST JOHN AVE 91005
PASTOR'S NAME: CHE ANN
PHONE NUMBER: (626) 794 1199 EXT 8108

PARISHIONER'S NAME

ADDRESS

- | | |
|---|--|
| (1) LUCIEN SARTON | 475 SOUTH LOS ROBLES AVE #7 91101 |
| (2) Florence Henda | 2215 S. Campbell Alhambra Ca. 91803 |
| (3) Karen Dinkins | 121 Cal. Fornia St. A Arcadia Ca. 91006 |
| (4) Moses Kangave | 540 E. Washington Blvd #7 Pasadena, CA 91104 |
| (5) Pam Tobet
(Janet Jaber) | 295 Parke St. Pasadena, CA 91101 |
| (6) Christ F. Toker
Christ F. Toker | 295 Parke St. Pasadena 91101 |
| (7) Grace Ngai | 1428 3 Palm Ave #A San Gabriel CA 91776 |
| (8) Tom Linchunroon | 1428 3 Palm Ave #H San Gabriel, CA 91776 |
| (9) Linda Burns | 6532 Friends Ave. Whittier, CA 90601 |
| 10 Elizabeth Burns | " " " " " " |
| 11) PLACE LYONNIA | 540 E WASHINGTON #7 PASADENA, CA, 91104 |
| 12) Daja Gomborjav | 647 N. Madison Ave #B, Pasadena, CA 91101 |

6.C
9/11/07
7:30 P.M.

PARISHIONER'S NAME

ADDRESS

- 13) Gantumur Gombogaw 647 N. Madison Ave #B, Pasadena, CA 91101
- 14) Hank & Diane Preyers 13415 Destino Pl, Cerritos Ca. 90703
- 15) Chris Yang 303 N Oakland Ave Apt #7, Pasadena (A)
- 16) ALEX SEMERENKO 6036 N Bartlett Ave San Gabriel CA 91775
- 17) ANNA SEMERENKO 6036 N BARTLETT AVE SAN GABRIEL CA 91775
- 18) Chris Aguayo 10153 Fernglan Ave Tujunga
- 19) Phyllis Marshall 521 Ranchito Rd Monrovia 91012
- 20) Rey Hernandez 902 W. Bonanza St. Alt. 91201
- 21) Alison Bradshaw 10882 Roe Ave. LA, CA 90034
- 22) JEANETTE PRÉBÉ 528 PRINCETON CIRCLE W. Fullerton, CA 92831
- 23) Beverly Giese 1237 Sierra Bonita, Pasadena 91104
- 24) Debbie Chen 505 N. Brand Blvd. Glendale, CA 91203
- 25) Melody Carriere 8905 Youngdale St., San Gabriel, CA. 91775
- 26) STACY A. CATHAN 1205 LEONARD AVE., Pasadena, CA 91107
- 27) DAVID HARRISON 4734 Ocean View Blvd. #18, Montross, CA 91020
- 28) Shana Lawton 1412 Sutherland St. Los Angeles CA
- 29) LETTY CHUNG 1460 E. CORPSON ST. #3 PASADENA 91104
- 29) Ray & Sandra Acosta 13081 CORNISH CREST RD WINTER CA 90665
- 30) Naomi Batistal-o-gy 416 Santa Paula Ave. Pasadena 91107
- 31) MARK & RAQUEL SOTO 5335 HARTWICK ST. L.A. CA 90041
- 32) CADOLIN V. PETERHOJDT 1775 N. Orange Dr. LA CA 90028
- 33) Robert IFFT 3206 DEL VINA ST. PASA. CA. 91107
- 34) Chen H. Feng 6325 Deerfield Ave., San Gabriel, CA 91775
- 35) ANTHONIE M. FENG 6325 Deerfield Ave., San Gabriel, CA 91775
- 36) Jacqueline Kelly 407 N. Michigan Ave., Pasadena 91106
- 37) Terri Mulero 1810 N Summit Ave Pasadena PA 91103
- 38) Mm Mamma Spears 827 W 123rd St Los Angeles CA 90014
- 39) - Salvador & Teresa Trchyni ~~1730~~ 1730 Paloma St. Pasadena, CA, 91104

PARISHIONER'S NAME

ADDRESS

- 40) Shelia Jones 500 N. Rosemead Blvd #22 Pasadena, 91107
- 41) David Templeton 206 Circle Dell Drive Azusa 91702
- 42) Ylva Wikstrand 11141 Osborne St, Lake View Terrace, CA 91342
- 43) Jodi Syjak 1221 Lyndon St Apt 19 S. Pas., CA 91030
- 44. Paul Stukan 1618 Camino Linda, South Pasadena CA 91030
- 45. John McGuire 2819 Halsey Arcadia, CA 91006
- 46 HARLEY WIDMARK 3332 FONIA AVE, ALTADENA 91001
- 47 Dennis More 521 Ranchito Rd Monrovia CA 91016
- 48. Rebecca ^{Pennerly Ave} Boller 416 Estancia Irvine, CA 92612
1011 W. Duarte Rd #20, Arcadia, CA 91007
- 49 DEBBIE KEINDORF
- 50. Sister Madeline Bobx 494 Ft Collins, Co 80522-0198
(Ambassador Univ Human)
- 51. TRAVIS WASHINGTON Bobx 523 Baton Rouge LA
* Bobx 523 Baton, 70821
- 52. V. Cole WASHINGTON + Progress Rd Baton Rouge LA
70807
- 53. Doug Stickle 265 Montreat Tr 28 SPAS 91030
- 54. Vanessa Cordero 2577C Timber Way Stevens Ranch CA 91504
- 55. Samuel MAMM 4343 JUAN WARD RD #299 MONROVIA CA 91020
8561 Desoto Ave #124 CANOGA PARK, CA 91304
- 56. Kenny Shild 820 W. MILLARD CYN. RD ALTADENA, CA 91001
- 57. GABRIEL AHN

PARISHIONER'S NAME

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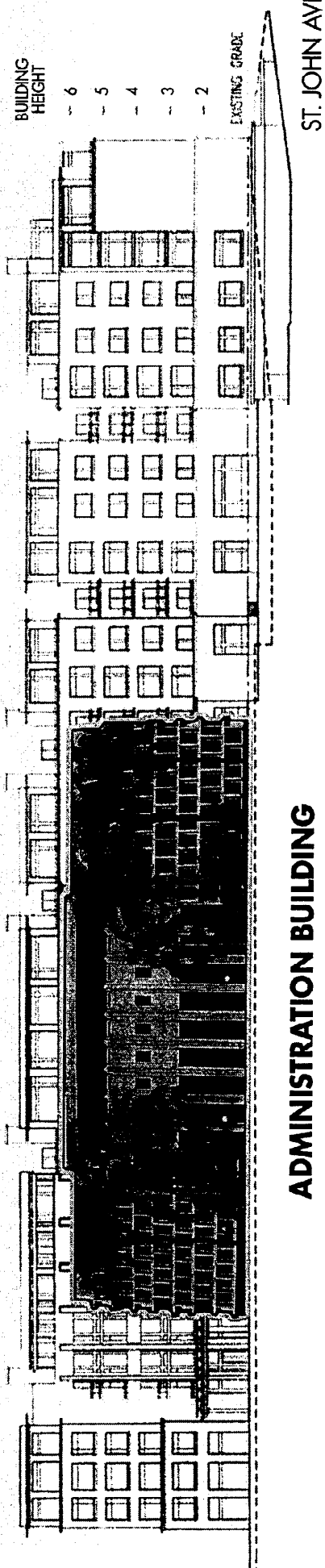
- (58) ROBERT Fukui 601 E CALIFORNIA BL #301, Pas. 91106
- (59) Kaylee Fukui " "
- (60) Victoria VAZQUEZ 3190 E. Orange Grove Plza Pasadena 91105
- (61) Nathan Invernò " "
- (62) RYAN INVERNÒ " "
- (63) Sonya Carrasquillo 1243 N. Mentor Ave Pasadena 91104
- (64) Chunson Kurata 151 W. Marshall St. #C San Gabriel 91776
- (65) KATRINA V TENGOL 201 N KENWOOD ST, #3 GLENDALE 91206
- (66) Phyllis WANJERU 645- N Raymond Ave Pasadena 91103
- (67) Desirée Ackerman 145 S. Vermont Ave #B Glendora, CA 91741
- (68) Benjamin Ackerman 145 S. Vermont ave #B Glendora, CA 91741
- (69) MARY CAMPUZANO 313 COENOA ST #3, MONROVIA, CA 91016
- (70) Laura Thompson 1933 E. Washington #3 Pas. 91104
- (71) Wilma Fujitani 754 Stanton St, Pas 91103
- (72) M E Shuang 1075 CORONET AVE Pas. 91107
- (73) Carol Romeo Carol Romeo - 3404 Maryana St, LaCrescenta
- (74) Dana Duthis 27361 Sierra Hwy #307 CanyonCountry 91214
- (75) Min Jung Kim 262 N. Los Rables Ave #322 Pasadena 91101
- (76) Molly Sutherland 1451 N Holliston Ave Pasadena 91104
- (77) Sharon Brady 726 E Lime Ave, Monrovia 91016
- (78) PATRICK BRADY 726 E Lime Ave Monrovia, Ca. 91016
- (79) Gwen Pasley 1706 E New York Dr. Pasadena, Ca 91101
- (80) Deane Pasley 1706 E New York Dr Pasadena CA
- (81) Linda Chelmo 3030 E JACKSON AVE, 91001
- (82) Linda Chelmo 1 Anaheim, CA 92806 CA

PARISHIONER'S NAME

ADDRESS

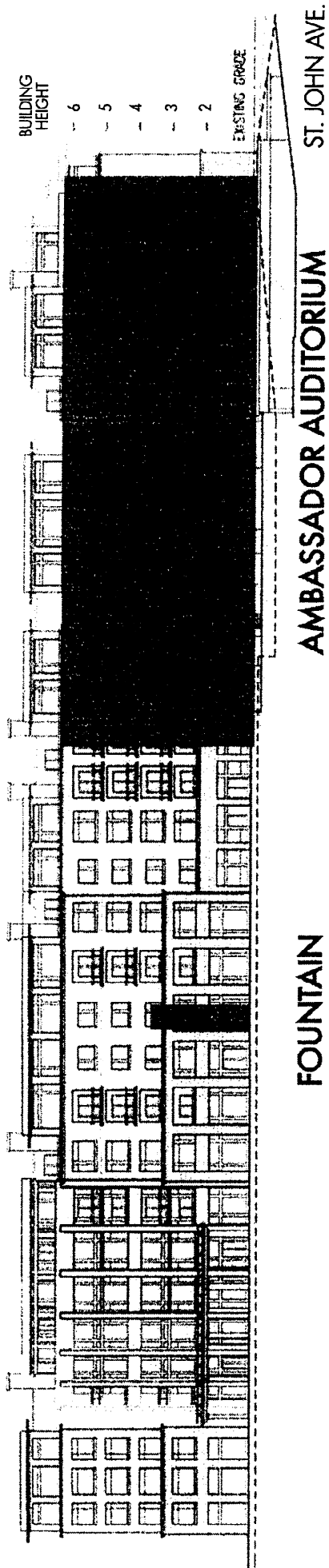
- 83 Heidi Oh 3550 Wilshire Bl. #1132. LA CA 90010
- 84 SAM FRASER 1990 LAS LUNAS ST PAS 91106
- 85 Betty Morgan 115 W. California Blvd #540 Pasadena
- 86 Marie Pjes 153 N. Oak Knoll Ave #20 PAS 91101 91105
- 87 Yety Stukan 1618 Camino Lindo, South Pasadena, CA 91030
- 88 Jeng-Cheng Hu 837 Garinborough Dr Pasadena CA 91107
- 89 Hannah Pritelard 656 W. Madison, PASADENA, CA 91101
- 90 Rebekah Peary 11141 Osborne St Lake View Terrace 91342
- 91 MARIA E. LOPEZ 231 W. CALIFORNIA BL. PAS. CA 91102
- 92 ANA MORANGE 1972 N. RAYMOND AVE, PAS., CA 91103
- 93 Keith K. 1970 N. RAYMOND AVE, PAS., CA 91103
- 94 JON SPINOLLA 1968 N. RAYMOND AVE, PAS., CA 91103
- 95 Bruce Skinner 3754 El Caminito, Upland Co. 91214
- 96 Jeanne Skinner 3754 El Caminito St, La Crescenta, CA 91214
- 97 Tonya AVE, Altadena, CA 91001
- 98 ~~Mark D. Lier~~ MARK D. LIER 416 ESTANCIA, IRVINE, CA 92602
- 99 Craig + Frances Dayman 1140 Coronet Ave. Pasadena, CA
- 100 Adam Spade 465 W. Washington Blvd
- 101 Ramon Ceramian 1809 Cerra Gorda St. Los Angeles, CA 90025
- 102 Marcus Jordan 11025 Gerald Ave Granada Hills CA 91344
- 103 Dana Mar 520 N. Trayer Ave, Glendora CA 91741
- 104 Sue Ann 820 Millard Canyon Rd Altadena CA 91001
- 105 LOLITA P. BREWER 3741 NO. EL SERENO AN ALTADENA 91001
- 106
- 107

**SIZE CONTRASTS:
THE STERLING VS. ADMINISTRATION BUILDING, AMBASSADOR AUDITORIUM**



ADMINISTRATION BUILDING

Lever Campus Building . SOUTH ELEVATION . GREEN STREET



FOUNTAIN

AMBASSADOR AUDITORIUM