

CORRESPONDENCE



PASADENA HERITAGE
651 SOUTH SAINT JOHN AVENUE
PASADENA, CA 91105

October 12, 2009

Mayor Bogaard and City Council Members
City of Pasadena
175 North Garfield Avenue
Pasadena, California 91105

RE: FEIR Comments for 680 East Colorado Boulevard

Dear Mayor Bogaard and City Council Members:

Thank you for the opportunity to comment on the 680 East Colorado Blvd. Commercial Project FEIR. Pasadena Heritage has participated in public meetings, met with the applicant and commented on the proposed project in the record in at least three other letters (Planning Commission, December 10, 2008, May 12, 2009, and July 21, 2009).

In summary, Pasadena Heritage finds that the IDS project is:

- Too large and over-scaled for the site.
- Not responsive to the adjacent historic buildings on South El Molino, Green Street, and the Arcade to the east on Colorado Boulevard, in terms of scale, massing, and design.
- Creates traffic and transportation problems that will negatively impact the adjacent historic district and, in particular, the Pasadena Playhouse across El Molino.
- Does not comply with the General Plan guiding principle that new construction should harmonize with existing historic fabric.
- Not acceptable and should not be approved as proposed.

The following are specific comments relating to the Final EIR:

Pasadena Heritage submitted comments on the Draft EIR regarding Aesthetics (that the project is out of scale with its historic district surroundings and that the proposed design is not compatible with surrounding historic buildings), and regarding Noise and Vibration (asserting that the proposed project may cause damage to the adjacent historically significant building), and identifying flaws in Parking and Traffic and Circulation. None of our concerns have been properly addressed in the Final EIR to conform with CEQA.

The proposed project will have a significant effect on the environment -- the Pasadena Playhouse Historic District and two other separate historic resources -- despite proposed implementation of the Mitigation

Measures described in the FEIR. It is our contention that the FEIR does not adequately evaluate the impacts on cultural resources and that the proposed mitigation is not sufficient to reduce impacts to less than significant.

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. CEQA asserts that “Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings ([*Standards*] 1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource” (*California Public Resources Code, PRC §15064.5*).

We respectfully ask the City Council to direct that the project be reduced in size and redesigned to conform to guidance in the *Standards for Rehabilitation* as they relate to new construction and additions to historic settings. This will result in a project that avoids a significant effect on the environment under CEQA.

Detailed FEIR Comments:

Scope and Content

Issues addressed in the FEIR include Noise and Vibration and Aesthetics, but the analysis fails to include Cultural Resources. The proposed project directly faces the Playhouse Historic District, listed on the National Register of Historic Places and California Register of Historical Resources, the Arcade Building (695 East Colorado Boulevard) and the 713-715 East Green Street Building. Each of these has been found to be an “historical resource” as defined in CEQA. The Noise and Vibration and Aesthetics sections allude to effects on historical resources that are expected to be caused by the proposed project, but do lessen those effects to less than significant impacts.

CEQA equates a “substantial adverse change” in the significance of an historical resource with a significant effect on the environment (*PRC §21084.1*). Because the proposed project will cause *substantial adverse change* in historical resources, environmental clearance for the project requires mitigation measures to reduce impacts. Material impairment under CEQA occurs when a project results in demolition, or materially alters in an adverse manner, the physical characteristics that convey a property’s historic significance, or is the reason for that property’s inclusion in an official register of historic resources (*PRC §15064.5(b)(2.)*). Thresholds of “substantial adverse change” are established in *PRC §5020.1* as demolition, destruction, relocation, or alteration activities that would impair the significance of the historic resource.

Because the proposed project is immediately adjacent to historical resources, does not meet concepts described in the *Standards* for new building design, and will alter the setting of the historical resources, it will cause a significant effect on the environment. Additional information that corroborates this very important assertion is contained in this letter.

State Clearinghouse

Lead agencies are required to send environmental documents, including Notices of Preparation and Draft Environmental Impact Reports (DEIRs) to the State Clearinghouse pursuant to CEQA Guidelines §15205 and §15206. No state Clearinghouse number is provided in the proposed project DEIR. A query of the CEQAnet Database on July 11, 2009 did not result in location of any documents for the proposed project submitted to the State Clearinghouse for state agency review, a requirement of CEQA.

City of Pasadena Central District Specific Plan

The proposed project, as currently designed does not meet the goals described in the City of Pasadena Central District Specific Plan:

- “Require new buildings to respect and embrace their surroundings.”
- “Provide for new development consistent with the scale, density and urban design features of the historic district.”

The proposed project, as designed is a very large, standard contemporary building. The design is nearly identical to any commercial building park, other than a very few small components shifted to make the design seem slightly more compatible to the setting. No noteworthy effort toward meeting those goals is detected in review of the proposed project’s design, overall planning, lack of articulation, or suburban-influenced detailing. Please refer to our additional comments addressing these issues under environmental impact analysis.

Existing Site Characteristics

The proposed project site description does not mention the essential fact that it is sandwiched between a National Register-listed historic district and two very small scale historical resources, the Arcade Building and Henly & Hays Insurance Co. Building, 713-715 East Green Street. The Arcade Building is two stories, with a small tower; describing it as merely commercial falsely makes the proposed project sound far more compatible with the surrounding very small scale buildings than it would actually be if built. The Henly & Hays Building is only one story in height. Similarly, existing buildings in the Playhouse Historic District on the west side of South El Molino Avenue are one to two stories in height on the street wall, this fact is very germane to, but curiously left out of, the evaluation of effects of the proposed project on the immediately adjacent historic district and separate historical resources. This must be revised to reflect the very diminutive scale of the existing, historical resources, in order to evaluate project-related effects under CEQA.

Project Description

None of the elevations included depict the proposed project in relation to the very small surrounding buildings. Such a study is generally included and would clearly show how incompatible the size and massing of the proposed project would be with the existing, small scale historic district and locally-recognized Arcade Building.

Project Construction Schedule

If construction were planned to commence in 2008, as stated, it would violate CEQA requirements for the EIR to be adopted prior to project commencement. The fragile historical resources immediately adjacent to and nearby the proposed project are not identified in the technical section as sensitive receptors.

It is the responsibility of the project applicant that shoring and basement construction plans not cause effects on adjacent historical resources, not the City Engineer, as stated. The Arcade Building is a fragile

building. Any construction-related activities, including vibration, shoring that could result in differential settlement, grading, or any other unintentional construction-related activities that damaged the historical resource would be an impact as defined in CEQA. Merely stating that review by a city official will reduce the chance of the effect resulting is false. That responsibility is not the purview of the City Engineer in performing plan check. “The 2.0 in./sec (50 mm/s) peak particle velocity criterion traditionally used to protect... [other building types] from construction-induced vibration damage is not... [sufficiently] conservative to protect historic and sensitive older buildings from these effects.” This is clearly described in “Vibration Criteria for Historic Buildings” by Walter Konon, M.ASCE, and John R. Schuring, M.ASCE, in the *Journal of Construction Engineering and Management*, Vol. 111, No. 3, September 1985: 208-215, for additional information.

In light of the fact that the buildings immediately adjacent to the proposed project are historic resources, we strongly urge adoption of a mitigation measure specifying either continuous vibration monitoring (best alternative) or crack monitoring (less effective) with an agreement that the project proponent repair all project-related damage in conformance with the *Standards for Rehabilitation*, under a consulting agreement with a qualified Historical Architect and civil engineer.

Project Objectives

The stated project objective, “to construct a viable commercial complex in the Playhouse District” is vague and ambiguous. Meeting this objective in a much smaller project would be entirely feasible and can be done in a more compatible design that would be more respectful of its significant setting, facing an historic district and immediately next door to an historic resource.

Project Site Setting

Although this section mentions two of the four historical resources adjacent to the proposed project (Pasadena Playhouse and Arcade Building), it does not address the larger Playhouse Historic District, or describe its boundaries, nor does it describe the 713-715 East Green Street Building, both of which are California Register-listed or eligible resources and thus subject to analysis for project-related effects under CEQA.

Environmental Impact Analysis

The document does not include a Cultural Resources section, but addresses impacts to historical resources in a cursory manner under Aesthetics. Because the proposed project will result in significant impacts to both the Playhouse Historic District and the Arcade Building, Cultural Resources must be addressed as a separate section in a re-circulated subsequent document.

Project Impacts and Mitigation Measures

The project fails to meet the Pasadena Playhouse Sub-District Design Guidelines. Guideline 2 asserts that the proposed project should “Reference Historic Structures.” No evidence is provided to support the proposed project referencing the nearby, historically significant buildings. Such references could include, but would not be limited to: using similar materials, colors and textures as nearby historical resources, following or playing on its neighbors’ fenestration rhythms and floor heights, using contemporary reinterpretations of those buildings’ details, employing varied roof heights, materials and street wall planes, subtle references to Spanish Colonial Revival style, and reducing the height to a reasonable rather than gargantuan size. If these design techniques were employed, it would demonstrate that the design of the proposed building respected that of nearby historical resources.

As currently presented the building design makes minimal effort to relate to its historic setting. The proposed scale, more than 160,000 feet, and five stories in height does not respect, emulate or relate in any way to the adjacent, small scale, well-articulated buildings. Proposed materials: GFRC and plaster are widely used and are ubiquitous in current design. Equally common, proposed expanses of contemporary storefront, large areas of curtain wall, and punched windows will not distinguish the building from any other suburban project built on speculation to attract users. The proposed bland materials, its blank and repetitive fenestration and more than 150 foot-long, continuous flat roof make no effort collectively to help the proposed project fit or blend into the surrounding neighborhood of small, historically significant buildings.

Guideline 3 in the Pasadena Playhouse Sub-District Design Guidelines states that such a project should “Add Rich Visual Detail.” No evidence is presented to demonstrate the recommended “amiable pedestrian character” or “decorative detail” that would “modulate the light and invite attention.” A passerby would neither be invited nor would he note that reflected light were modulated in any way other than standard suburban architectural treatment.

We bring the *Secretary of the Interior’s Rehabilitation Guidelines for Setting* to your attention, as they apply to new construction in historic districts (underling indicates emphasis that applies to the proposed project):

Secretary of the Interior's Rehabilitation Guidelines
SETTING (District/Neighborhood)¹

| Recommended | Not Recommended |
|--|--|
| <p>Design for the Replacement of Missing Historic Features Designing and constructing a new feature of the building or landscape when the historic feature is completely missing, such as row house steps, a porch, a streetlight, or terrace. <u>It may be a restoration based on documentary or physical evidence; or be a new design that is compatible with the historic character of the setting.</u></p> | <p><u>Introducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting's historic character...</u></p> <p>[The proposed project is both entirely out of scale at five stories in height in an area of one- and two-story buildings. The proposed bland contemporary design is inappropriate and intrusive to the setting of both separately significant buildings and to the Playhouse Historic District.]</p> |
| <p>Alterations/Additions for New Use Designing and constructing new additions to historic buildings when required by the new use. <u>New work should be compatible with the historic character of the setting in terms of size, scale, design, material, color, and texture.</u></p> | <p><u>Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the setting.</u></p> <p>[The proposed project is not compatible with the sizes of contributing buildings in the historic district it faces on two sides, the scale and proportion is inappropriate and not well-articulated, the design is trend-driven, not timeless, and does not respond to its elements in its setting, the GFRC, troweled concrete and expenses of glass materials, lack of texture and color are monotonous, and currently are all too commonly used elsewhere. The proposed design is neither a respectful "neighbor" to its historic setting and does it impart any special sense of place.]</p> |
| <p>Building Site Minimizing disturbance of terrain around buildings or elsewhere on the site, thus reducing the possibility of destroying or damaging important landscape features or archeological resources.</p> | <p><u>Introducing heavy machinery into areas where it may disturb or damage [fragile historic buildings] important landscape features or archeological resources.</u></p> <p>[Failure to use specialized shoring and pile driving methods will likely result in damage to the Arcade Building and potentially to other fragile adjacent resources. This would constitute "material impairment" to the historic resources and thus "substantial adverse change," an impact as defined in CEQA.]</p> |
| <p>Surveying and documenting areas where the terrain will be altered to determine the potential impact to important landscape features or archeological resources.</p> | <p>Failing to survey the building site prior to the beginning of rehabilitation work which results in damage to, or destruction of, important landscape features or archeological resources.</p> <p>[Unknown, no information presented in environmental document.]</p> |
| <p>Protecting, e.g., preserving in place important archeological resources.</p> | <p>Leaving known archeological material unprotected so that it is damaged during rehabilitation work.</p> <p>[See above.]</p> |
| <p>Planning and carrying out any necessary investigation using professional archeologists and modern archeological methods when preservation in place is not feasible.</p> | <p>Permitting unqualified personnel to perform data recovery on archeological resources so that improper methodology results in the loss of important archeological material.</p> <p>[See above, no investigation or protections mentioned in environmental document.]</p> |

¹ Secretary of the Interior's Standards for Rehabilitation & Guidelines for Rehabilitating Historic Buildings: 102-108 and 112-113

**Secretary of the Interior's Rehabilitation Guidelines
SETTING (District/Neighborhood)¹**

| Recommended | Not Recommended |
|---|---|
| <p>Alterations/Additions for the New Use Designing new onsite parking, loading docks, or ramps when required by the new use <u>so that they are as unobtrusive as possible</u> and assure the preservation of the historic relationship between the building or buildings and the landscape.</p> <p><u>Designing... adjacent new construction which is compatible with the historic character of the site and which preserves the historic relationship between the building or buildings and the landscape.</u></p> <p>Removing non-significant buildings, additions, or site features which detract from the historic character of the site.</p> | <p>Locating any new construction ...in a location which contains important landscape features or open space, for example removing a lawn and walkway and installing a parking lot.</p> <p>[Comment: Proposed parking ramp driveways, large unembellished openings face the both the Jacob Maarse and Pasadena Playhouse buildings (directly and offset, respectively), these driveways will not provide pedestrian animation or any special design qualities to the otherwise significant setting. The orientation of these large (70+ feet overall) openings will surely not enrich setting of these buildings- creating a back-of-house or loading lock atmosphere for these otherwise extraordinary resources and the district. Introduction of a low-ceiling pedestrian pass-through immediately north of parking egress does not reduce the effects of the changes to the district sufficiently to justify the addition of intrusive parking ramps facing these significant buildings and the historic district.]</p> <p><u>Placing parking facilities directly adjacent to historic buildings where automobiles may cause damage to the buildings or landscape features, or be intrusive to the building site.</u></p> <p><u>Introducing new construction onto the building site which is visually incompatible in terms of size, scale, design, materials, color, and texture; which destroys historic relationships on the site; or which damages or destroys important landscape features.</u></p> <p>Removing a historic building in a complex of buildings; or removing a building feature, or a landscape feature which is important in defining the historic character of the site.</p> |

The EIR states “[d]ue primarily to the taller facades [in the proposed project design] ...the project would result in a substantial change to the visual character of the site.” The proposed project is located immediately facing an historic district and next to a separate historical resource -- a “substantial change” as acknowledged constitutes material alteration, and substantial adverse change under CEQA. This impact is not mitigated or lessened as demonstrated in the EIR to a less than significant level, thus the project will have an significant effect on the environment as defined in CEQA

The proposed project does not meet the objectives described in the *Secretary of the Interior's Standards for Rehabilitation*, specifically ...Additions for the New Use, which include the following as “not recommended” “Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the setting.” We note that the City of Pasadena recently approved a project singled-out by the National Park Service in “Interpreting the Standards Number 41: Incompatible Alterations to the Setting and Environment of a Historic Property” (Attachment : U.S. Department of the Interior, Technical Preservation Services, 2006), as improper treatment to the setting of an historic building. We believe that the proposed project, like the one described in the recent guidance, does not tread lightly on the historic fabric of its setting or neighbors.

As described in Interpreting the Standards Number 41), we believe that City review and approval would not prove or assure conformance with the *Standards*. The assertion that conformance with design review will lessen project related impacts on historical resources is not accurate. The current design is incompatible with its setting. The suggestion that design review would in some mysterious way, reduce those effects in the future constitutes deferred mitigation. The avoidance or reduction of environmental impacts is the cornerstone of CEQA. Mitigation Measures, such as this one, that are ineffective in avoiding or reducing significant impact are ineffectual and dangerous to the community.

Mitigation measures must accomplish one of the following:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action;
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment;
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;
- (e) Compensating for the impact by replacing or providing substitute resources or environments.[CEQA Guidelines, §15370].

The described mitigation -- design review -- does not sufficiently commit the project to future mitigation because it lacks detailing of specific performance standards. Because the specifics of how performance standards would be met are lacking, this aspect of mitigation cannot be deferred. Thus mitigation as described is not adequate does not satisfy requirement in CEQA.

Alternatives Considered

The EIR describes the environmental impacts of the proposed plan and those of a number of alternative plans. Alternative plans considered are intended to cover the full range of feasible alternatives. Alternatives must be discussed in meaningful detail, and provide sufficient information to enable understanding, evaluation, and to respond to conclusions. The discussion should contain facts and analysis, not the conclusions or opinions of the lead agency or preparer.

The 80- percent reduced project alternative would reduce nearly all of the impacts described above and would meet the vague project goal of constructing “a viable commercial complex in the Playhouse District.” We strongly recommend that this alternative be re-considered. The facts and “analysis” contained the EIR do not provide any justification for the reduced project alternative being considered but not chosen. The EIR merely provides simple mathematical calculations of the difference between the proposed project and each of the alternatives, including the 80-percent reduced project (e.g. 159,971 proposed square feet versus 31,471). What is lacking is the meaningful analysis of why it and other alternatives would not meet project goals. Because the project goals were vague and ambiguous, this and other alternatives appear to meet its requirements.

In the discussion of the environmentally superior alternative, entirely new criteria for project goals are introduced, that the project must create a: “feasible...” (for what?), “substantial commercial project...” (as measured against what criteria?), “with all proposed components, including the public plaza, public parking garage...” (why 155 are additional public parking parking spaces necessary?) and “adequate office space” (by what definition?). *Adequate* is defined in by *Webster’s Revised Unabridged Dictionary* (1913) as “Equal to some requirement...” although no such requirement is described, set forth or outlined in the DEIR project goals.

We ask that the 80-percent reduced project alternative be reconsidered and that justification for its dismissal be discussed in meaningful detail, providing sufficient information to enable understanding, evaluation, and to respond to conclusions. If a project alternative that is somewhat larger can be shown to comply with all the design standards and zoning regulations, that project should be clearly defined as an alternative and could even constitute the preferred alternative.

Mitigation

Because the proposed plan would result in *significant environmental impacts*, such as the proposed project, the EIR must propose appropriate *mitigation measures* that would eliminate, minimize or repair the greater environmental impact of the preferred alternative. In instances where mitigations are not feasible or the agency does not wish to adopt a feasible alternative that would avoid them, the EIR must describe the *unavoidable environmental impacts* and, in instances where it chose to accept them, the reasons the choice was made. The proposed project can be expected to result in impacts to historical resources as described above. The project EIR does not address those impacts and fails to reduce those effects to a less than significant level.

Conclusion

In conclusion, Pasadena Heritage believes that the FEIR remains incomplete and that the project proposed is not fully analyzed to the extent required under CEQA. We continue to find the project over-scaled and incompatible with the Playhouse District and not sensitive enough to adjacent historic structures.

We urge the City Council to require further environmental analysis and to deny any approvals for the FEIR or the project at this time.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan N. Mossman". The signature is fluid and cursive, with a large loop at the end.

Susan N. Mossman
Executive Director

Jomsky, Mark

From: v b [paixhollywood@yahoo.com]
Sent: Monday, October 12, 2009 7:10 PM
To: Jomsky, Mark
Subject: Opposition to Homestead Project as proposed

I would like to add my opposition to the current proposed development at 680 E. Colorado; it is too large and does not fit in with the historic adjacent historic properties.

**Victor Brown
Granada Court 109
700 E. Union St.
Pasadena, CA 91101**

10/13/2009

Jomsky, Mark

From: Tornek, Terry
Sent: Monday, November 09, 2009 9:31 AM
To: Jomsky, Mark
Subject: FW: Proposed large office complex

From: Ted Krontiris [mailto:tkrontir@gmail.com]
Sent: Monday, November 09, 2009 9:14 AM
To: Tornek, Terry
Cc: Sue
Subject: Proposed large office complex

Dear Terry,

Sue and I are unalterably opposed to the development project for a large office complex on El Molino.

As residents on this street, we see the ever-increasing traffic brought on by development around Colorado and the city's shameful negligence in the matter of traffic on the narrowest street in Madison Heights. The health and safety issues are serious, and the city's allowing for increased traffic runs counter to its current, long-standing traffic plan.

Please transmit our opposition to the City Council.

Sincerely,

Ted Krontiris
Sue Parilla
770 S. El Mollino Avenue

11/10/2009

From the desk of
Carolyn Naber

October 12, 2009

Mayor Bill Bogaard
Vice Mayor Victor Gordo
Members of the City Council
City of Pasadena
100 N. Garfield Avenue
Pasadena, CA 91109

Subject: Agenda Item 6.A. regarding the proposed IDS Playhouse Commercial Development Project located at 680 East Colorado Boulevard

Dear Mayor Bogaard, Vice Mayor Gordo and Members of the City Council:

**Why I voted with my colleagues on the unanimous vote
on the City of Pasadena Planning Commission**

The following are my comments made on the public record at the July 22, 2009 Planning Commission meeting. They are my personal views regarding the Final Environmental Impact Report (EIR) for the proposed project located at 680 E. Colorado Boulevard after my study of the EIR and consideration of the findings and recommendations made by staff:

This EIR is deficient and cannot be certified. Many of the "Findings" in the Staff Report cannot be made to justify the Project and a Statement of Overriding Considerations cannot be justified based on the following:

1. There are serious pedestrian safety concerns that were not studied in the EIR or adequate mitigations recommended. The design of Project will encourage pedestrian traffic mid-block on El Molino between Colorado & Green Street while at the same time, because of the parking garage ingress & egress location, will encourage car traffic southbound on El Molino from Colorado traveling across the pedestrian crosswalk area, where there will be inevitable pedestrian safety issues. The applicant's PowerPoint presentation during the Draft EIR process and in the May 13, 2009 staff report included an artist's rendering of a wide crosswalk connecting the Project with the Playhouse, mid-block on El Molino. The same artist's rendering was used as background for a large portion of the applicant's PowerPoint presentation during their July 22, 2009 presentation for the Final EIR. During public testimony, the applicant said that it would

be legal to cross El Molino at the mid-block point because of Playhouse Alley. During the Draft EIR process, the Transportation Advisory Commission (TAC), the Planning Commission and members of the public pointed out that there could be a serious pedestrian safety issue with this mid-block pedestrian crossing and that it should be studied in the EIR with mitigations recommended in the EIR so that the applicant, members of the public and any other interested party would be able to review the impacts and comment publicly on the recommended mitigation measures. However, the EIR failed to study and recommend mitigations for the pedestrian safety issues and any mid-block walkway improvements. In the response to TAC's concern about this pedestrian/auto conflict, the FEIR responds:

"The comment regarding a preference for particular project features, such as the walking link, do not make such features part of the proposed project, and thus are not analyzed in the EIR."

It does not seem credible that the EIR would recommend mitigations for auto traffic several blocks away from the Project, but fail to recommendation mitigations for pedestrian safety issues adjacent to the Project.

The Final EIR recommends directional signage in the public parking structure instructing the public to cross El Molino at Green Street or Colorado Blvd. and proposes a future study of pedestrian issues in the "vicinity". The lack of a pedestrian study in the EIR and these recommended mitigations are not adequate to mitigate the inevitable, and unsafe mid-block pedestrian crossing.

2. El Molino is a de-emphasized street in the General Plan. Under Policy 3.11 of the Mobility Element it states: *"Recognize designated de-emphasized streets as routes where efforts will be made to limit increases in travel. Measures that would increase traffic in these streets will not be planned or implemented."* Adding more traffic on to a de-emphasized street is in conflict with the General Plan. An alternative Project design, reduced project size or other mitigation should have been included that would not allow the Project to conflict with this General Plan policy.
3. The proposed Project recommended by staff is in conflict with the Central District Specific Plan Playhouse Sub-District (CDSP) because of its scale and massing in relation to the historic Playhouse and Arcade. Under Guideline #2 on Page 175 it states that *"The scale, massing and degree of façade articulation of new structures should be respectful of historical buildings"* and Recommendation #3 on Page 175 states that *"Massing should not overwhelm or diminish historic structures"*. A reduced sized

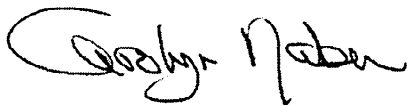
alternative should have been included and studied in the EIR so that a Project alternative that is not in conflict with this provision of the Specific Plan could be considered.

4. Only an 80% reduced project alternative was included in the EIR which was based on car traffic “triggers” for “significant impact” only. The 50% and 75% alternatives that were requested during the Draft EIR process were dismissed. Other impacts that may justify a 50% and 75% reduced project alternative (or any other percentage reduction) were dismissed, such as:
 - a. Conflicts with de-emphasized street policies in the Mobility Element
 - b. Massing and scale next to the Pasadena Playhouse & Arcade, conflicting with the Central District Specific Plan Playhouse Sub-District
 - c. Water and any other infrastructure impacts
 - d. Pedestrian safety issues from mid-block crossings on El Molino.

5. The economic feasibility study does not justify a Floor Area Ratio (FAR) increase of 10%. The economic feasibility study (Memo from Keyser Marston Associates to Richard Bruckner dated August 25, 2008 and included in the Staff Report dated July 22, 2009) is out of date and according to the city’s own consultant, does not reflect current market conditions. Further, the study identifies the Project Alternative without the FAR 10% Bonus and Public Parking option as the most financially feasible. This is in conflict with staff’s conclusion that the 10% FAR bonus is justified.

I urge you to support the Planning Commission’s action regarding the EIR, so that the EIR may be revised to correct its deficiencies and additional alternatives proposed. I remain open-minded to all new proposals and staff recommendations, and look forward to reviewing afresh a revised EIR and Staff Report.

Sincerely,



Carolyn Naber
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Pasadena, CA 91115
crnaber@earthlink.net
626.795.7675