



February 10, 2020

Pasadena City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, California 91101

RE: Affordable Housing Concession Permit #1869: 253 South Los Robles Avenue

Dear Honorable Mayor and Members of the City Council:

Pasadena Heritage continues to have concerns about the project at 253 S. Los Robles Avenue because of its impact on traffic in our City's urban core and on adjacent historic residential neighborhoods. It is important that the City Council fully contemplate the project's impacts tonight in a public forum.

We acknowledge that the project is slightly smaller, has been reconfigured a bit, and has a slightly improved affordability percentage, all of which we consider positive changes. However, the central issue for us regarding this project is the amount of traffic it will generate, especially in combination with the additional new housing immediately north and south of it.

We submitted a previous letter before the January 13th, 2020 hearing, which was continued to a later date. At that same January City Council meeting, Transportation Director Laura Comejo presented on Pasadena's varied traffic metrics, including Vehicle Miles Traveled (VMT), Vehicle Trips (VT), and Level of Service (LOS). Those members of the public who stayed late to discuss the different methodologies contributed to a lively and important discussion. At the time, we stated that we believe the City's adopted VMT thresholds are set too high, and therefore it is nearly impossible for any project to show a significant traffic impact. Other participants in the discussion that night included members of the Pasadena Complete Street Coalition, residents of Madison Heights Neighborhood Association, and other Pasadenans who were simply concerned about worsening traffic conditions. Although these different groups brought their own viewpoints to the conversation, they all essentially lamented the same fact: there is too much traffic in central Pasadena. We believe that the project that is proposed tonight will only exacerbate an already serious and growing problem.

Increased traffic has various negative consequences, including on human health and safety and on the environment. Pedestrians (on foot or bike), drivers, bus riders, residents and businesses all suffer the consequences. We understand that increasing density near public

transit or in the Central District may move people closer to jobs and services, and therefore reduce traffic, but we've seen no specific proof that those living in the Central District use public transportation or work close by.

To encourage local employees to live in these new units, parking capacity could be significantly reduced or local employment somehow incentivized. The multiple large housing projects that have been proposed or are in construction are urban in density and scale, but suburban in their parking standards. New residents of the 253 South Los Robles Avenue project are just a ten-minute walk from Del Mar Station, have immediate access to multiple bus lines, and will be living just south of the proposed Cordova Street Bike Lane. These networks make it possible to live as a one-car or even car-free household in the proposed building. What positive steps or incentives can be used to encourage fewer cars per household? There seems to be a critical mismatch between the city's various goals: adding housing, improving transportation, and moving toward a more sustainable future.

We request that you carefully weigh this project and its impacts, and particularly the cumulative impacts along this rapidly changing corridor. We contend that the City's VMT thresholds need to be revisited and are willing to provide technical support if needed. For further reference, we have attached our letter from the previous hearing, which provides some further analysis of the project and some mitigation options.

Secondly, we urge that in the ongoing Specific Plan process, the Los Robles corridor be given careful consideration and that specific controls be explored. The east side of the street, from the Colorado Boulevard intersection south, has many parcels that are likely to be considered prime development targets. Should those properties be redeveloped, especially as residential projects, the already overloaded street will become inundated with even more traffic, likely following the same traffic patterns, and the nearby neighborhoods will be further burdened.

Thank you for considering our concerns and recommendations.

Sincerely yours,



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director

cc: David Reyes
Talyn Mirzakhian



January 13, 2020

Pasadena City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, California 91101

RE: Affordable Housing Concession Permit #1869: 253 South Los Robles Avenue

Dear Honorable Mayor and Members of the City Council:

Pasadena Heritage continues to have concerns about the project at 253 S. Los Robles Avenue because of the impact on traffic in our City's urban core and on adjacent residential neighborhoods. It is important that the City Council fully contemplate the project's impacts tonight in a public forum.

We note that the revised project has some improvements in height, massing and affordability since the project's last iteration. In this latest downscaled version, the affordable housing percentage has actually been improved. While this is a step forward, it also indicates that the concessions and extra units that were indicated as needed to offset the affordable units in the last version were indeed excessive. We also note that these requested concessions are almost in line with the Concession Menu that the City passed in 2019, which we helped to craft.

The major unaddressed issue is the traffic impact, as well as noise, air quality, and public safety that come with additional traffic. With three new large-scale residential projects confined to one block of South Los Robles Avenue added to other major construction in the immediate area, it is clear that there will be a dramatic increase in traffic. This traffic will pour out onto the already clogged arterials of Los Robles, Del Mar, and California. We challenge the project to further mitigate these impacts through exploration of more efficient transportation alternatives including car share for residents, transit passes, or by providing parking off site. Reducing the subterranean parking from three levels to two would decrease building cost and these cost savings could be passed on to future tenants.

We believe that the VMT threshold is set far too high, especially for projects in the Central District, and therefore it is nearly impossible for any project to show a significant traffic impact, though clearly these impacts are real. If the City of Pasadena and the State of California want to incentivize urban infill housing in the urban core, then we should not expect those new urban residents to drive according to existing suburban trends. We appreciate that Transportation Director Laura Comejo will present on VMT methodology

later tonight, and we suggest a reduction of the current threshold. We believe that in the Central District, where there is greater walkability and more transit options, VMT thresholds should be lower than in suburban residential zones. The city's current approach has led to more congestion and less safe conditions for pedestrians, while indirectly increasing the cost of housing.

We ask that the Council tonight review this project not in a vacuum, but with attention to the wider context and trends of the current built environment. We also offer to work with the Planning Department and the Department of Transportation to develop more modern, effective thresholds. Thank you for your consideration and care in reviewing this project.

Sincerely yours,



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director

cc: David Reyes
Talyn Mirzakhonian
Laura Comejo