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Pasadena Civic Center Coalition  
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November 14, 2022

Re: Council Meeting 11/14/2022: Agenda Item 15; CEQA and NEPA Matters

Mayor Gordo and Councilmembers:

The Pasadena Civic Center Coalition (PCCC) submits the following comments for the Administrative Record.

The California Environmental Quality Act (CEQA) Analysis and Claimed Class 32 "In Fill" CEQA Exemption Are Inadequate.

There are significant features that distinguish the subject project from others in the exempt class and, therefore, there are unusual\_circumstances which remove the project from the claimed Exempt Class.

These features and unusual circumstances include, but are not limited to, the following matters.

The project site is part of the Pasadena Civic Center National Register Historic District. The Historic District has been found to be of national significance not only as a collection of architecturally significant buildings but also due to its park-like setting and linkages through the overarching symmetry of the Civic Center design and greenspace connecting the buildings and providing public areas to gather and to view the beauty of the buildings and setting. The National Register designation also specifically identifies the importance of the public greenspace provided on Parcel 3 of the project site and the matching Southside (YWCA) Parcel 3, both Parcels 3 being identified as "parks" in the National Register Nomination. Due to the holistic importance of the Civic Center District, the National Register listing states "This district must be preserved as a unit."

The project would significantly impact Parcel 3 on the project site by removing and destroying much of Parcel 3 greenspace – at least 70 -80 percent of Parcel 3 -- and replacing this amount of current greenspace with massive new construction.

The claimed Class 32 "In Fill" Exemption from CEQA review and analysis fails to properly address the project's significant historic resource impacts. The project would eliminate a character defining feature of the Pasadena Civic Center National Register

District. As a result, and, as a result of the improperly claimed CEQA Exemption, the City has failed to rely on the proper threshold of significance under CEQA Guideline 15064.5 by failing to consider the elimination of a character defining feature of an historic resource to be a significant adverse impact under CEQA.

The claimed Class 32 "In Fill" Exemption fails to allow the City to proceed in the manner required by law by in effect eliminating required fully enforceable mitigation measures to address the project's adverse impacts on the historic YMCA the historic YWCA, other District historic resources, and cumulative impacts to the District.

The claimed Class 32 "In Fill" Exemption disables the City's ability to adequately comply with the public information requirements of CEQA Guideline section 15125, subdivision (d) to analyze and disclose the project's inconsistencies with mandatory and specific policies contained in Pasadena's Central District Specific Plan and Pasadena's Tree Protection Ordinance.

As a result of the claimed Class 32 "In Fill" Exemption, the City failed to proceed in the manner required by law by segmenting from the project full and adequate public consideration of the need to address applicable Pasadena land use plans and policies considering the loss of symmetry and public greenspace in the Civic Center that would result from the project's construction on Parcel 3, which is existing public greenspace.

For these reasons, features and unusual circumstances, the City's reliance on the claimed Class 32 "In Fill" Exemption for this project is legally inadequate under CEQA.

On the Basis of the CEQA Discussion Above, the Project Will Have a Significant Impact on the Human Environment Pursuant to the National Environmental Policy Act of 1969 (NEPA), and, Therefore, the NEPA Finding of No Significant Impact Cannot be Made.

The proposed project will result in an adverse change in the significance of any historic resources located on the Project Site or in the Affected Environment through demolition, destruction, relocation, or alteration. The project will significantly destroy the greenspace area on Parcel 3 of the site, thereby eliminating a character defining feature of the Pasadena Civic Center National Register District. The City fails to consider the elimination of a character defining feature of an historic resource to be a significant adverse impact under NEPA, and, therefore, cannot make the required Finding of No Significant Impact.

Further, the City's emails and/or letters to SHIPO appear to have been incomplete and arguably misleading. In PCCC's opinion, the Advisory Council on Historic Preservation

should have been, and in fact must be, afforded a reasonable opportunity to comment with regard to the project with a full understanding and disclosure if its significant negative impact on a character defining feature of the Civic Center National Register Historic District.

Thank you for this opportunity to comment on the matters addressed herein.

Sincerely,

PASADENA CIVIC CENTER COALITION