



March 2, 2022

Jason Van Patten, Senior Planner
City of Pasadena
Planning and Community Development Department
175 North Garfield Ave.
Pasadena, CA 91101
VIA EMAIL

Re: 491-577 Arroyo Parkway – “Affinity Project” Draft Environmental Impact Report

Dear Mr. Van Patten:

The West Pasadena Residents’ Association has identified several elements of the DEIR that we believe have serious legal issues and are potentially flawed or unacceptable. These are outlined below.

1. CEQA requires that the developer define and commit to the specific use of a project and that the use be outlined specifically in the DEIR.

Here, the DEIR states two different uses for Building A of the project—the medical office use designation, which could be changed to residential units at the option of the developer. These are entirely different uses with significantly different impacts to the environment and the community. Consequently, the proposed project is not “stable,” a requirement under CEQA which requires an EIR to contain a finite project description. Until the physical concept is firm, the project does not qualify for an EIR under CEQA. Until the proposed project is specifically defined, both in physical planning and in use, WPRA considers the DEIR to be inadequate.

2. There are flawed elements in the traffic counts. This issue is critical as it understates the real levels of projected traffic.

- A. Traffic Credits: overall in the DEIR, the methodology used in determining traffic credits appears to be flawed. Here, the “Existing Use” traffic in the CEQA DEIR is stated 2,454 daily trips-in fact, current traffic counts are likely less than 10% of this figure. As such, the traffic credit used in the “Net Trip Generation For The Project” of the DEIR vastly understates the true traffic volumes by almost double that would be created by this project.
- B. Noise: as the noise analysis of the DEIR uses the overstated traffic counts (see 2 A, above), the true real daily trips of the project will generate more noise which has not been addressed in the DEIR. Accordingly, the noise analysis appears to be flawed.

- C. Dual Use: the choice of Medical Office use- there is substantial increase in the traffic impact between the medical office “option” and the “residential” option.
- D. Cumulative effects of traffic: There appears to be little consideration of the cumulative impacts of the two major Medical Office projects soon to be built (758-766 So Fair Oaks and 590 So Fair Oaks) representing an additional of 200,000 SF of space, which soon will be under construction. This represents a massive increase in traffic, negatively impacting west and central Pasadena. Additionally, we see that at least one of these projects utilized the similar traffic analysis (see 1A above) which would also understate the real traffic impact.

3. Zoning concessions and “Project Massing”. The proposed project is a massive, 7 story, 93 foot high, 3.3-acre project of 348,000 sf, with generous zoning concessions:

- A. Density increases from 1.5 to 2.89 FAR.
- B. Height increases from 50 feet to 93 feet.
- C. Setbacks of zero to five feet.
- D. This massive project is inconsistent with the adjacent historic neighborhood.
- E. The project will destroy 28 mature trees and replace *some* of these with potted trees and shrubs. This combined with minimal setbacks is not in concert with a walkable, shady pedestrian experience envisioned in the General or Specific plans of this area.

Thank you for your consideration of our points of view.

Respectfully,

Dan Beal, President
West Pasadena Residents’ Association
For the Board of Directors

Pete Ewing, Land Use Lead

The WPRA is an all-volunteer organization dedicated to maintaining and enhancing the quality of life in southwest Pasadena. We have over 1,000 paid members.