

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

August 30, 2021

Jason Van Patten
City of Pasadena
175 N. Garfield Avenue
Pasadena, CA 91101

RE: Planned Development #39 (Affinity Project)
– Notice of Preparation of an Environmental
Impact Report (NOP)
SCH # 2021080103
GTS # 07-LA-2021-03677
Vic. LA-710/PM: T31.757

Dear Jason Van Patten:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The Project involves demolishing six buildings totaling 45,912 square feet (sf) and constructing two new buildings. Building A would be a 154,000 sf, 7-story medical office building with ground-floor commercial uses. Building B would be a 184,376 sf, 7-story building with 85,800 sf of assisted living uses and 98,576 sf of independent living uses, including up to 95 senior housing units. There would also be five subterranean levels providing up to 850 parking spaces. In addition, the project would enable the flexibility to alter the uses in Building A to provide different amounts of commercial, residential, and parking uses. Although the project does not expect to alter the uses in Building A, this flexibility will allow the project to respond to the economic needs and demands of the City at the time of project implementation. The City of Pasadena is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately .6 miles away from State Route 110 (SR-110), and approximately 5,200 feet away from where the Interstate 210 (I-210), State Route 134 (SR-134), and Interstate 710 (I-710) meet. From reviewing the NOP, Caltrans has the following comments.

Caltrans looks forward to reviewing the Vehicle Miles Traveled (VMT) analysis for this project. For information on determining transportation impacts in terms of VMT on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

Note that the updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as

Jason Van Patten
August 30, 2021
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well as access management issues.” Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the City’s reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

The following information is included for your consideration. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. A TDM strategy that the City should consider for this project is keeping vehicle parking to a minimum, since research has shown that surplus parking can induce VMT.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans’ review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2021-03677.

Sincerely,

Frances Duong for

MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



September 1, 2021

Ref. DOC 6272497

Jason Van Patten, Senior Planner
City of Pasadena
Planning and Community Development Department
175 North Garfield Avenue
Pasadena, CA 91101

Dear Mr. Van Patten:

NOP Response for Affinity Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report for the subject project on August 5, 2021. The proposed project is located within the jurisdictional boundary of District No. 16. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to local sewer lines, which are not maintained by the Districts, for conveyance to either or both the Districts' Arroyo Seco Section 4 Trunk Sewer, located in the northern terminus of Garfield Avenue at Hardison Place, or Arroyo Seco Section 5 Trunk Sewer, also located in the northern terminus of Garfield Avenue at Hardison Place. The Districts' 21-inch diameter Arroyo Seco Section 4 Trunk Sewer has a capacity of 69.0 million gallons per day (mgd) and conveyed a peak flow of 2.1 mgd when last measured in 2015. The Districts' 16-inch diameter Arroyo Seco Section 5 Trunk Sewer has a capacity of 4.3 mgd and conveyed a peak flow of 0.4 mgd when last measured in 2015.
2. The wastewater generated by the proposed project will be treated at the Whittier Narrows Water Reclamation Plant (WRP) located near the City of South El Monte, which has a capacity of 15.0 mgd and currently processes an average flow of 9.9 mgd, or at the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently processes an average flow of 21.3 mgd.
3. The expected average wastewater flow from the project site, described in the NOP and Initial Study as a 154,000 square feet (sf) medical office or a 197-unit apartment with 3,000 sf commercial uses; a 85,800 sf of assisted living uses; a 95-unit apartment, but no more than 289 units in the entire project site; and a total of 5,882 sf of restaurant uses, is 92,642 gallons per day (gpd). For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the

Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743 or at mandyng@lacsdsd.org.

Very truly yours,

Mandy Ng

Mandy Ng
Environmental Planner
Facilities Planning Department

MMN:mmn



Metro

September 3, 2021

Jason Van Patten
City of Pasadena
Planning and Community Development Department
175 North Garfield Avenue
Pasadena, CA 91101
Sent by Email: jvanpatten@cityofpasadena.net

RE: Affinity Project – 465 and 577 South Arroyo Parkway
Notice of Preparation of Environmental Impact Report (EIR)

Dear Mr. Van Patten:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Affinity Project (Project) located at 465 and 577 South Arroyo Parkway in the City of Pasadena (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro L Line (Gold) facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes demolition of six existing buildings located at 491, 495, 499, 503, 541, and 577 South Arroyo Parkway and construction of one 7-story assisted living building and one 7-story medical office building with ground floor commercial. The project is proposing a total of five subterranean levels providing up to 850 parking spaces.

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Recommendations for EIR Scope and Content

Light Rail Adjacency

1. Rail Operations: The Metro L Line (Gold) currently operates weekday peak service as often as every six minutes in both directions. Trains may operate in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the Project.
2. Impact Analysis: Due to the Project's proximity to the L Line (Gold) ROW, the EIR must analyze potential effects on light rail operations and identify mitigation measures as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to light rail service. Specific impacts and mitigation measures that should be studied include:
 - a. Disturbance to Light Rail Structural Support: The Project includes excavation and construction of underground structures. Tiebacks supporting these structures have the potential to disturb adjoining soils and jeopardize support of the light rail tracks.

Recommended mitigation measures:

- i. Technical Review: The Applicant shall submit engineering drawings and calculations, as well as construction work plans and methods, to evaluate any impacts to the Metro L Line (Gold) infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.
- ii. Structure Setback: Where the Project site is immediately adjacent to Metro ROW, all building structures (above ground and below grade) and projections shall be set back at least five (5) feet from the property line shared by the Project property and Metro to allow adequate space for construction and property maintenance activities. Property owners will generally not be permitted to access Metro property to construct or maintain private development and/or landscaping, except as approved as indicated in paragraphs 3.d and 3.e below.
- iii. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro L Line (Gold) or the structural and systems integrity of Metro's light rail infrastructure. Not later than one month before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 1. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 2. Notify Metro of any changes to demolition and construction activities that may impact the use of the ROW;
 3. Permit Metro staff to monitor demolition and construction activities to ascertain any impact to the L Line (Gold) ROW.
- b. Overhead Catenary System (OCS) Setback: Overhead catenary wires and support structures adjacent to the Project power Metro trains. OCS wires should be treated like any high voltage electrical utility wires. The Project's structures, including protrusions that face the ROW (e.g.

balconies, awnings and other appurtenances), are proposed to be in close proximity to the OCS and can pose an electrocution hazard during Project construction and operation.

Recommended mitigation measures:

- i. Technical Review: The Applicant shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Metro L Line (Gold) infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.
 - ii. OCS Protection: The Applicant shall take all necessary measures to protect the OCS from damage due to Project activities during and after construction, pursuant to applicable California Department of Industrial Relations regulations (Cal. Code of Regulations, Title 8). The Applicant shall post proper signage for equipment working around the OCS wires.
 - iii. Setback: Any building protrusions facing the ROW (e.g. balconies, awnings and other appurtenances), as well as landscaping shall be set back at least ten (10) feet from the OCS wires and support structures.
 - iv. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro L Line (Gold) or the structural and systems integrity of Metro's light rail infrastructure. Not later than one month before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 1. Work in close coordination with Metro to ensure that Station access, visibility, and structural integrity are not compromised by construction activities or permanent build conditions;
 2. Construct a protection barrier to prevent objects, material, or debris from falling onto the ROW;
 3. Notify Metro of any changes to demolition and construction activities that may impact the use of the ROW;
 4. Permit Metro staff to monitor demolition and construction activities to ascertain any impact to Metro L Line (Gold);
 5. Apply for and obtain approval from Metro for any special operations, including the use of a pile driver or any other equipment that could come into close proximity to the OCS or support structures, not later than one month before the start of Project construction.
3. Advisories to Applicant: The Applicant is encouraged to contact Metro Development Review early in the design process to address potential impacts. The Applicant should also be advised of the following:
- a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metro ROW with potential to damage light rail tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.

- c. ROW Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval from Metro not later than two months before the start of Project construction.
- d. Cost of Impacts: The Applicant will be responsible for costs incurred resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.
- e. Maintenance: Metro will require prompt removal of graffiti and trash along the concrete block wall and landscaped area adjacent to Metro ROW. For these and other maintenance activities that will require access to Metro property, the Applicant must obtain a Temporary Right of Entry Permit before accessing property and coordinate activities through Rail Operations Track Allocation process, as discussed above.

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to Fillmore Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Oriented Development (TOD) Planning Grant: The City is a recipient of Metro's TOD Planning Grant in support of updates to several Specific Plans. The TOD Planning Grant's objective is to develop and adopt transit-supportive regulations that promote equitable, sustainable, and transit-supportive planning to increase transit ridership. One of the plans to be updated is the Central District Specific Plan (Specific Plan Update), which encompasses the Project site. The City should encourage alignment and evaluate the Project's consistency with the Specific Plan Update including the proposed policies, development standards, and implementation measures.
2. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/about/funding-resources/>.
3. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to the Fillmore Station, including orienting pedestrian pathways towards the station.
4. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby Fillmore Station.

- b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged
- c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.
5. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.
6. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.
7. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,


Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

February 2021



Metro and Regional Rail Map

Metro & Regional Rail

metro.net
 pacificsurfliner.com
 metrolinktrains.com



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

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Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal

By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience

The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content

The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
 - Planning & Conceptual Design,
 - Engineering & Technical Review, and
 - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us

For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484
- Online In-take Form: <https://jpublic.metro.net/in-take-form>

Additional Information & Resources

- Metro Development & Construction Coordination website: <https://www.metro.net/devreview>
- Metro GIS/KML ROW Files: <https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data>
- Metrolink Standards and Procedures: <https://www.metrolinktrains.com/about/agency/engineering--construction>

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a “third rail” along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates “Local” and “Rapid” bus service within the street, typically alongside vehicular traffic, though occasionally in “bus-only” lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions. Metro’s [NextGen Bus Plan](#) re-envisioned bus service across LA County to make service improvements that better serve riders.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS

COMMON ADJACENCY CONCERNS



UNDERGROUND ROW

Transit operates below ground in tunnels.

- Excavation near tunnels and infrastructure
- Clearance from support structures (e.g. tiebacks, shoring, etc)
- Coordination with utilities
- Clearance from ventilation shafts, surface penetrations (e.g. emergency exits)
- Surcharge loading of adjacent construction
- Explosions
- Noise and vibration/ground movement
- Storm water drainage



AERIAL ROW

Transit operates on elevated guideway, typically supported by columns.

- Excavation near columns and support structures
- Column foundations
- Clearance from OCS
- Overhead protection and crane swings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Coordination with utilities
- Noise reduction (e.g. double-paned windows)



AT-GRADE ROW

Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.

- Pedestrian and bicycle movements and safety
- Operator site distance/cone of visibility
- Clearance from OCS
- Crane swings and overhead protection
- Trackbed stability
- Storm water drainage
- Noise/vibration
- Driveways near rail crossings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Utility coordination



BUS STOPS

Metro operates bus service on city streets. Bus stops are located on public sidewalks.

- Lane closures and re-routing service during construction
- Temporary relocation of bus stops
- Impacts to access to bus stops



NON-REVENUE/OPERATIONAL

Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).

- Excavation and clearance from support structures (e.g. tiebacks, shoring, etc)
- Ground movement
- Drainage
- Utility coordination
- Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



*Phases above may include fees for permits and reimbursement of Metro staff time for review and coordination.

Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project’s proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to [Zoning Information 1117](#). To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online [In-Take Form](#), found on Metro’s website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:

Metro Development Review Team

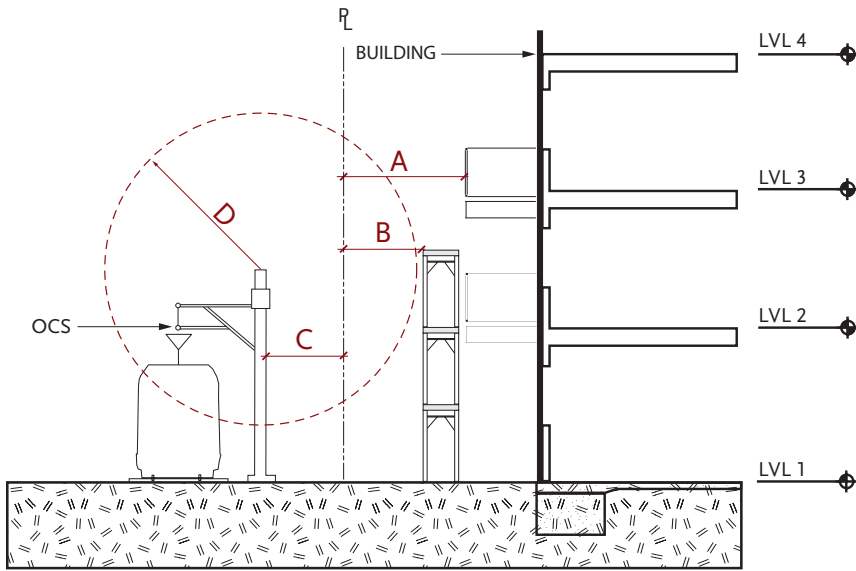
Website: <https://www.metro.net/devreview>

Online In-take Form: <https://jpublic.metro.net/in-take-form>

Email: devreview@metro.net

Phone: 213.418.3484

Sample Section: Adjacency Conditions



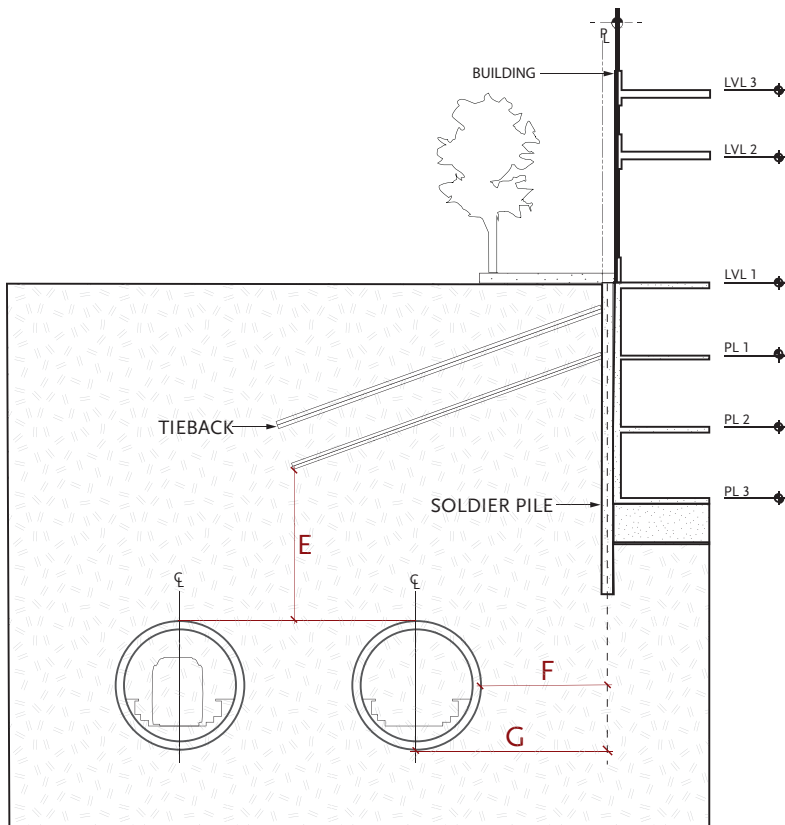
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to overhead catenary system (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online [In-Take Form](#) to begin consultation.
3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion. Contact us at devreview@metro.net or at 213.418.3484.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process. Download Metro's ROW files [here](#).
- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].
- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).



Metro

Downtown
Santa
Monica





Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.



1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

Site Plan & Conceptual Design

1.3 Building Setback

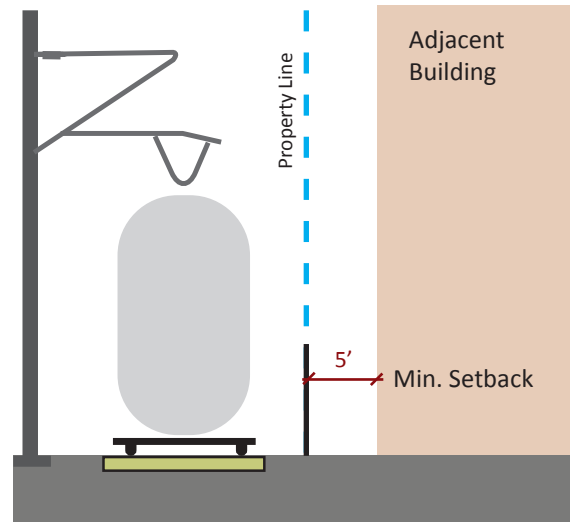
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

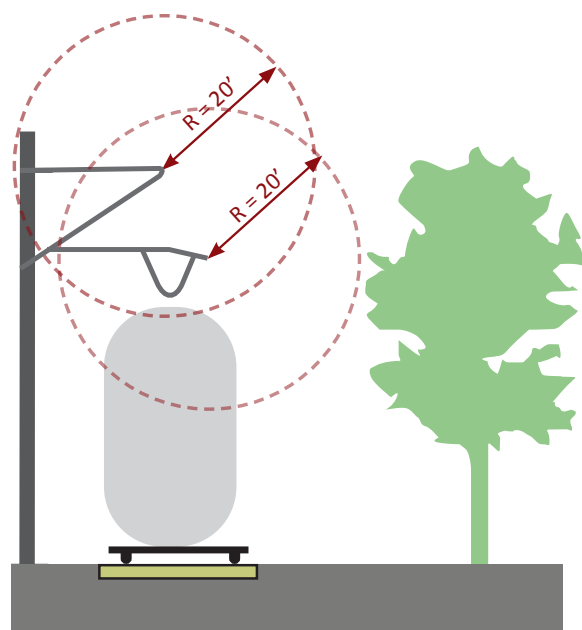


1.4 Overhead Catenary System (OCS) Clearance

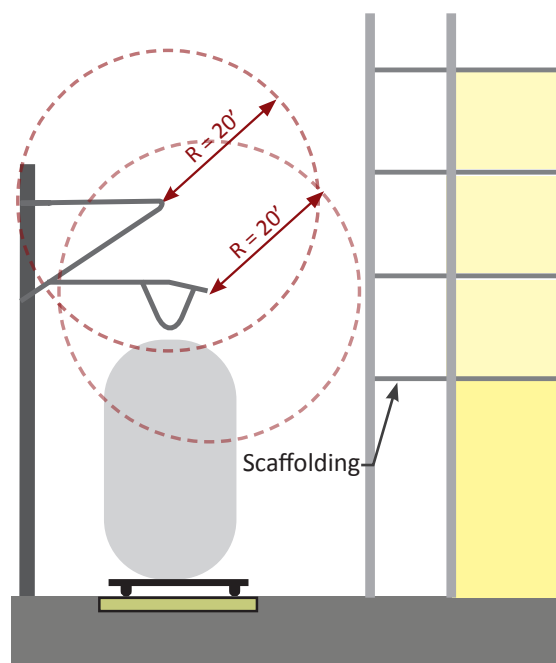
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

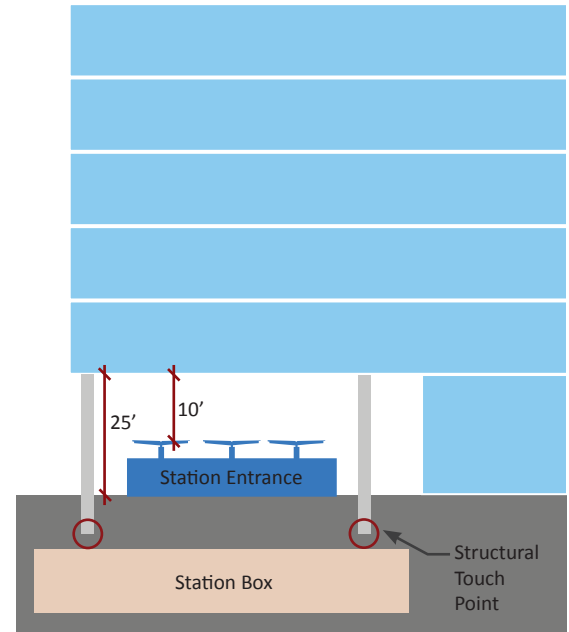
Site Plan & Conceptual Design

1.5 Underground Station Portal Clearance

Metro encourages transit-oriented development. Where development is planned above station entrances, close coordination is needed for structural safety as well as access for patrons, operations, and maintenance. Below are key design rules of thumb for development planned to cantilever over an entrance to an underground Metro Rail station.

RECOMMENDATION:

1. Preserve 25 feet clearance at minimum from plaza grade and the building structure above.
2. Preserve 10 feet clearance at minimum between portal roof and building structure above.
3. Coordinate structural support system and touchdown points to ensure a safe transfer of the building loads above the station portal.
4. Coordinate placement of structural columns and amenities (e.g. signage, lighting, furnishings) at plaza level to facilitate direct and safe connections for people of all mobile abilities to and from station entrance(s).
5. Develop a maintenance plan for the plaza in coordination with Metro.



Projects that propose to cantilever over Metro subway portals require close coordination with Metro Engineering.



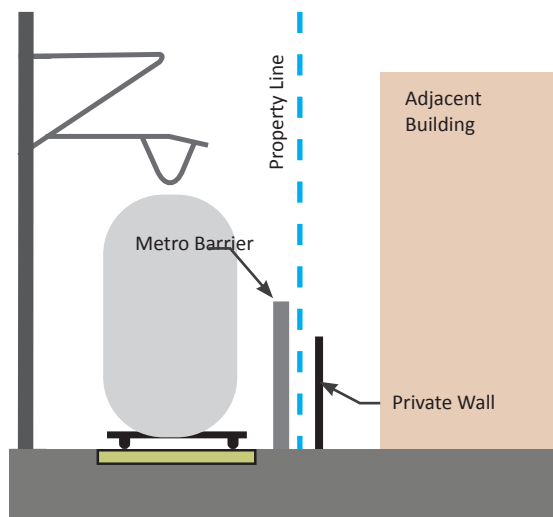
1.6 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

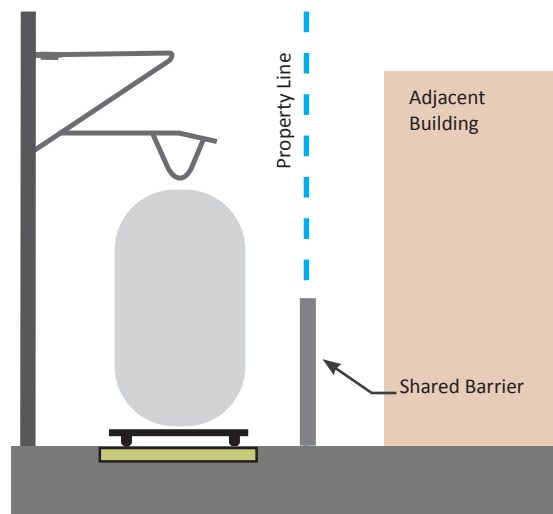
RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

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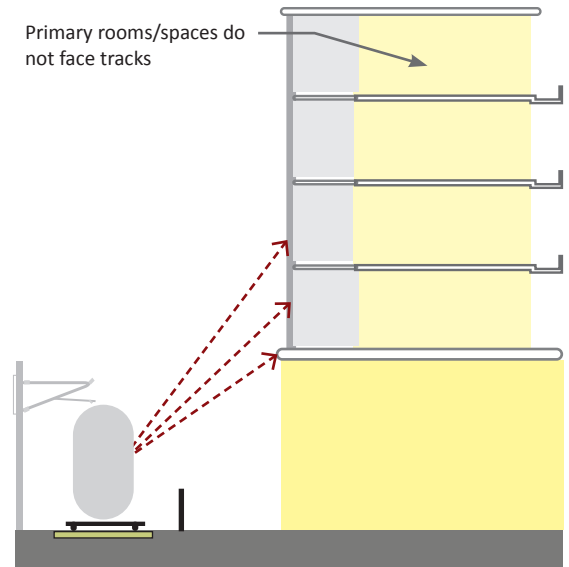
1.7 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

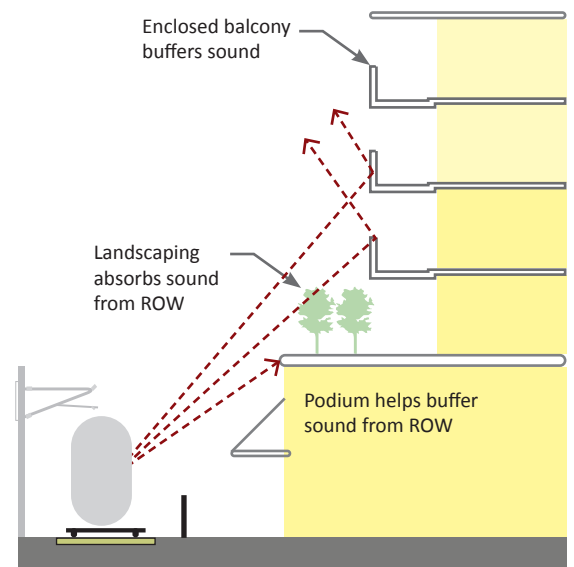
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or “back of house” rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.



1.8 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.



Safety elements of a gate and pedestrian arms have been constructed at the Monrovia Station.

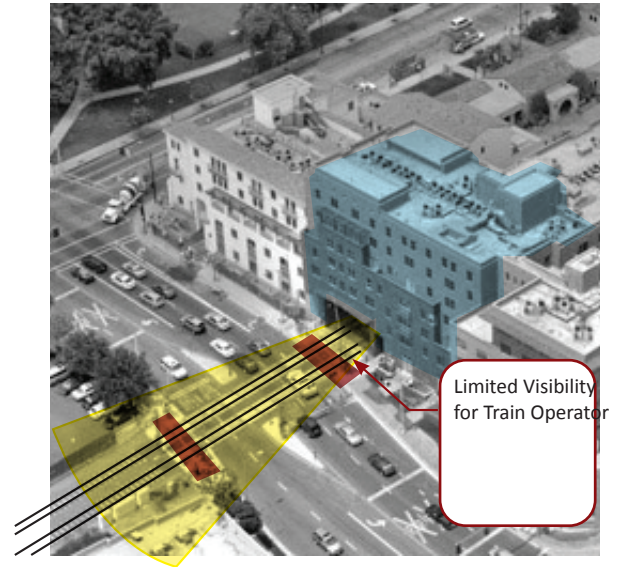
Site Plan & Conceptual Design

1.9 Sight-Lines at Crossings

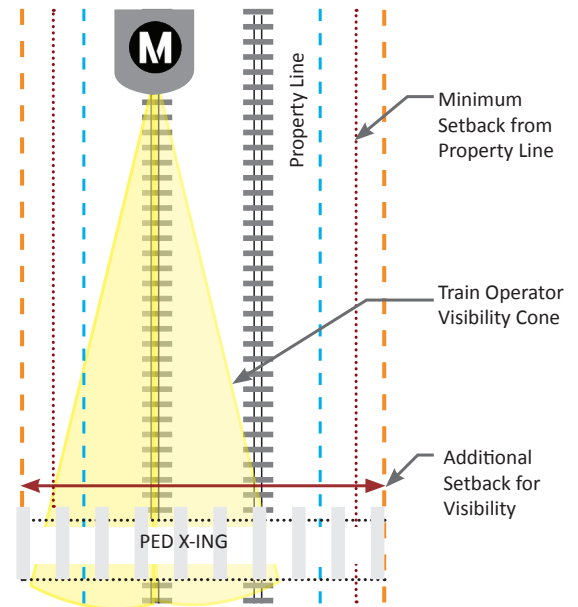
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

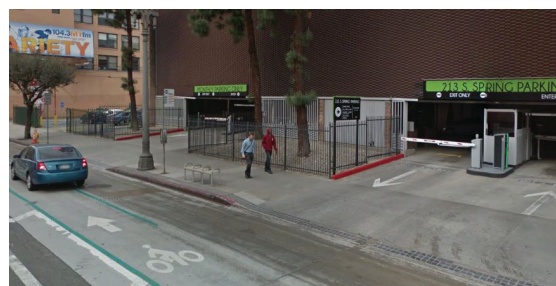


1.10 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

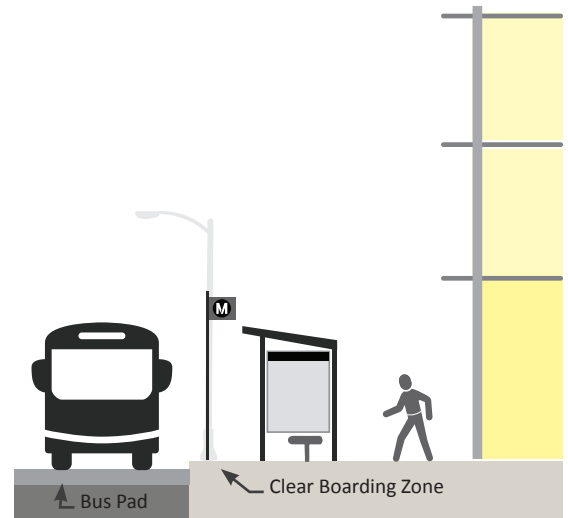
Site Plan & Conceptual Design

1.11 Bus Stop & Zones Design

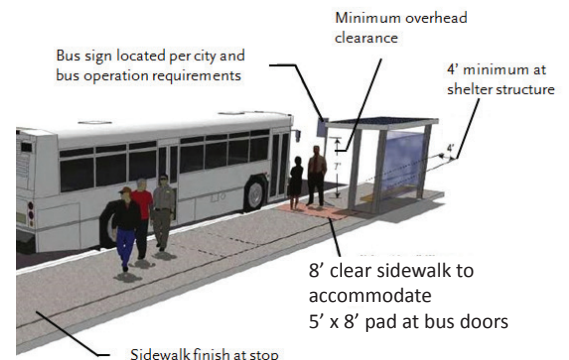
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro’s Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro’s Transfers Design Guide for more information at <https://www.metro.net/projects/station-design-projects/>
- Accommodate 5’ x 8’ landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15’ preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14’ preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.



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GORBEL 2.5
GORBEL, NEW YORK, U.S.A.
DANGER! DO NOT EXCEED RATED CAPACITY





Engineering & Technical Review

Engineering & Technical Review

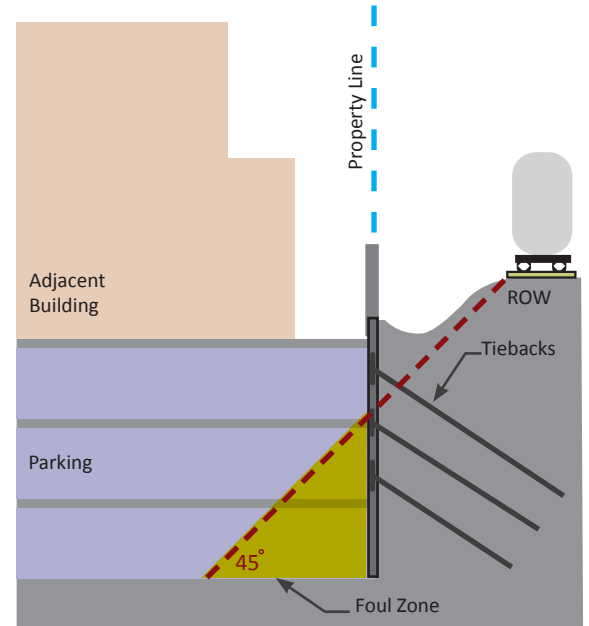
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.



2.2 Proximity to Tunnels & Underground Infrastructure

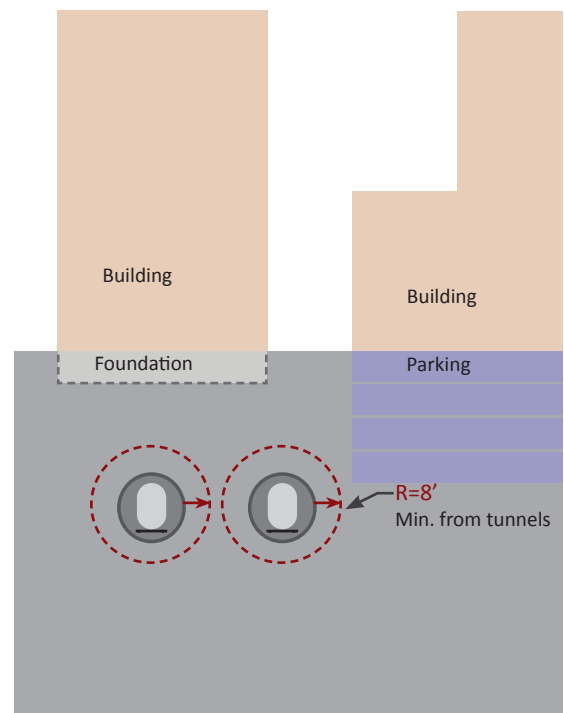
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

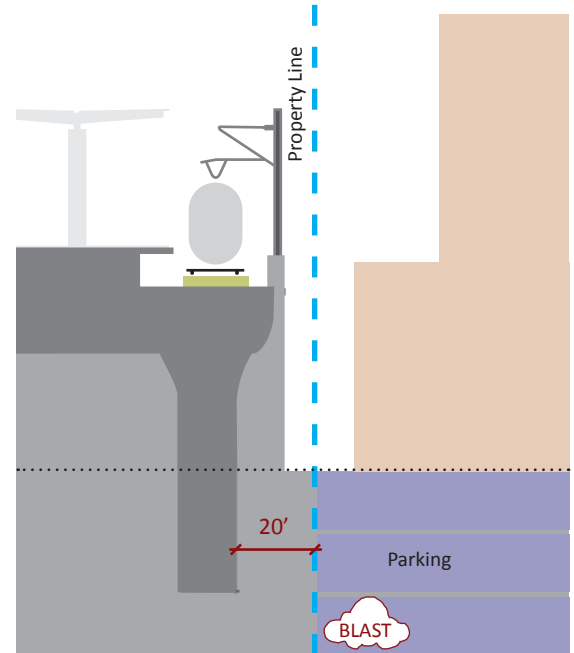


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRRA Engineering Standards and Guidelines.



Metro may need to monitor development construction near Metro facilities.



3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.
2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.
3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.
4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

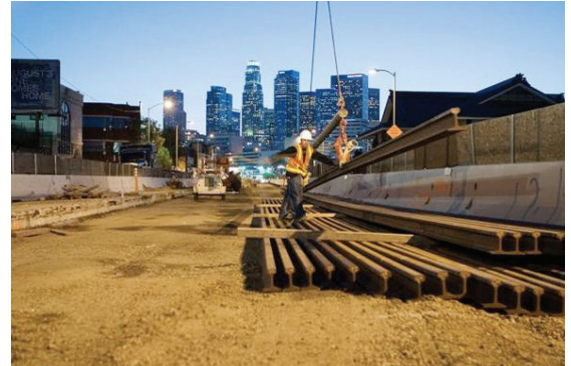
Construction Safety & Management

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.



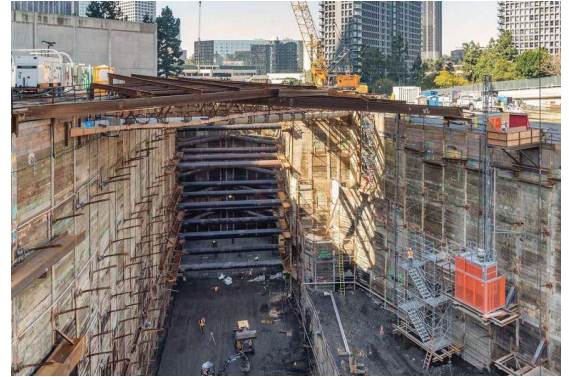
3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

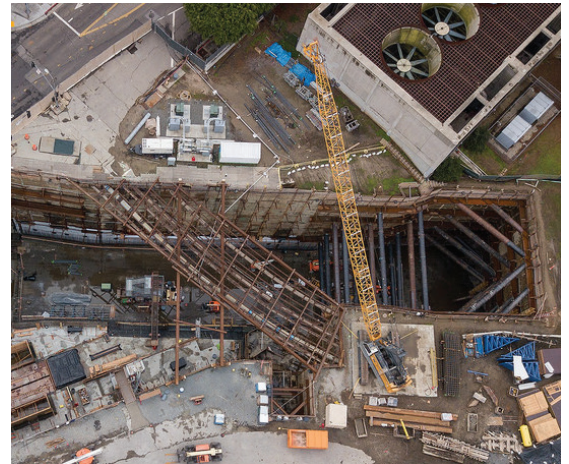
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

Construction Safety & Management

3.5 Crane Operations

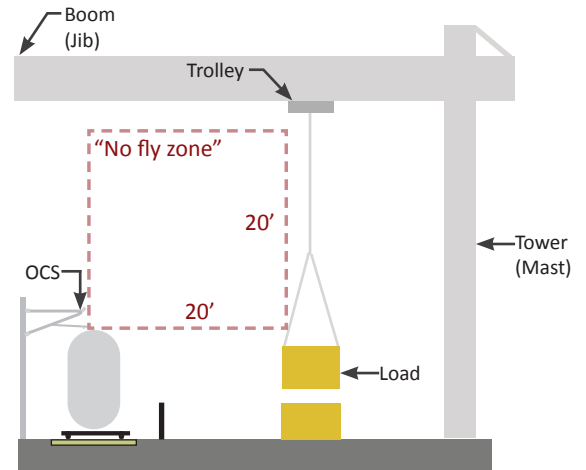
Construction activities adjacent to Metro ROW may require moving large, heavy loads of building materials and machinery using cranes. Cranes referenced here include all power-operated equipment that can hoist, lower, and horizontally move a suspended load. To ensure safety for Metro riders, operators, and transit facilities, crane operations adjacent to Metro ROW must follow the safety regulations and precautions below and are subject to California Occupational Safety and Health Administration (Cal/OSHA) standards.

RECOMMENDATION:

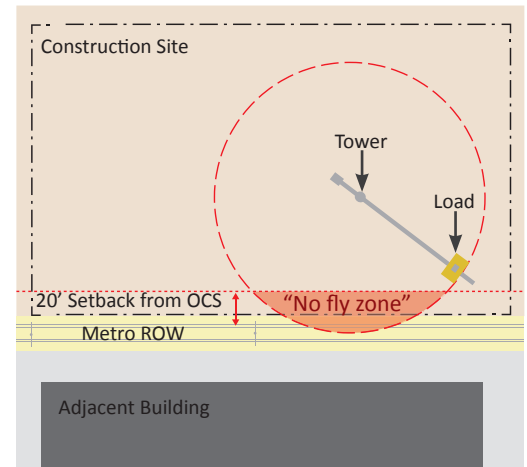
Coordinate with Metro to discuss construction methods and confirm if a crane work plan is required. Generally, crane safety near Metro's ROW and facilities largely depends on the following factors: 1) Metro's operational hours and 2) swinging a load over or near Metro power lines and facilities. Note:

1. Clearance: A crane boom may travel over energized Metro OCS only if it maintains a vertical 20-foot clearance and the load maintain a horizontal 20-foot clearance.
2. Power: Swinging a crane boom with a load over Metro facilities or passenger areas is strictly prohibited during revenue hours. To swing a load in the "no fly zone" (see diagrams to right), the construction team must coordinate with Metro to de-energize the OCS.
3. Weathervaning: When not in use, the crane boom may swing 360 degrees with the movement of the wind, including over energized Metro OCS, only if the trolley is fully retracted towards the crane tower and not carrying any loads.
4. Process: Developers and contractors must attend Metro Track Allocation (detailed in Section 3.2) to determine if Metro staff support is necessary during crane erection and load movement.
5. Permit: Developers must apply for a Metro Right-of-Entry permit to swing over Metro facilities.

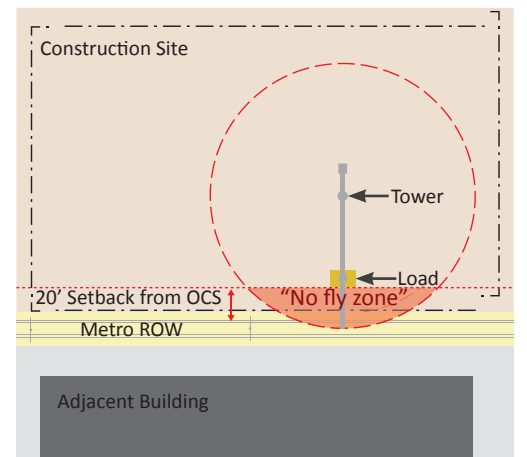
Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.



Plan View: Crane swing and load are restricted near Metro ROW.



Plan View: While crane boom swings over "no fly zone," the trolley and load are retracted to maintain clearance from OCS.



3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.



Constructed above is a wooden box over the entrance portal for overhead protection at the 4th/Hill Station.

Construction Safety & Management

3.7 Pedestrian & Emergency Access

Metro’s riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.



3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

Construction Safety & Management

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/telecommunication services.

RECOMMENDATION: Coordinate with Metro Real Estate during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.

To begin coordination with Metro Real Estate, visit www.metro.net/devreview and select the drop-down “Utility Project Coordination.”



Coordination of underground utilities is critical to safely and efficiently operate Metro service.



3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility

A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)

Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman

Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone

Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway

A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)

Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)

JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)

Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R

Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M

Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink

A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual

Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus

Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)

High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards

A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail

Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)

Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities

Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed

Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)

One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit

Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)

Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)

A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study

Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit

Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding

Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/





NATIVE AMERICAN HERITAGE COMMISSION

DATE RECEIVED

August 12, 2021

AUG 13 2021

Jason Van Patten
City of Pasadena
175 N. Garfield Avenue
Pasadena, CA 91101



CHAIRPERSON
Laura Miranda
Luiseño

Re: 2021080103, Planned Development #39 (Affinity Project), Los Angeles County

VICE CHAIRPERSON
Reginald Pagaling
Chumash

Dear Mr. Van Patten:

SECRETARY
Merri Lopez-Keifer
Luiseño

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

PARLIAMENTARIAN
Russell Attebery
Karuk

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

COMMISSIONER
William Mungary
Paiute/White Mountain Apache

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPA.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places; features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

September 1, 2021

jvanpatten@cityofpasadena.net

Jason Van Patten, Senior Planner

City of Pasadena, Planning and Community Development Department

175 North Garfield Avenue

Pasadena, California 91101

Notice of Preparation of a Draft Environmental Impact Report for the Proposed Affinity Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁶, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy⁷.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
LAC210819-03
Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁷ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

Varsh, Tess

From: Andi Ceragioli <>
Sent: Tuesday, August 10, 2021 4:58 PM
To: Varsh, Tess
Subject: The Affinity Project - Planned Development #39 (465-577 S. Arroyo Parkway) - comment letters
Attachments: 2021-05-25-Design-Commission-3A-491-577-S-Arroyo-Prkwy-Public-Comment-Done.pdf; 2021-05-25-Design-Commission-3A-491-577-S-Arroyo-Prkwy-Public-Comment-Feldmann.pdf; 2021-05-25-Design-Commission-3A-491-577-S-Arroyo-Prkwy-Public-Comment-Little.pdf; 2021-05-25-Design-Commission-3A-491-577-S-Arroyo-Prkwy-Public-Comment-Marchioni.pdf; 2021-05-25-Design-Commission-3A-491-577-S-Arroyo-Prkwy-Public-Comment-Mulheim.pdf; 2021-05-25-Design-Commission-3A-491-577-S-Arroyo-Prkwy-Public-Comment-Smith.pdf; 2021-05-25-Design-Commission-3A-491-577-S-Arroyo-Prkwy-Public-Comment-Worrell.pdf; M.F. Schillaci ltr.pdf

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Hi Tess Varsh:

Attached are 8 letters in support of the Planned Development Project (#39) which will be considered by the Pasadena Planning Commission tomorrow, August. 11, 2021.

Thank you.

ANDI CERAGIOLI

██████████ | ██████████ | ██████████
2450 Mission Street, Suite 21 | San Marino, CA 91108

GOVERNMENT & COMMUNITY RELATIONS
PUBLIC AFFAIRS
LAND USE ENTITLEMENTS

ADVOCACY

Results Matter. 

Takeda, Michi

From: Darrell Done
Sent: Sunday, May 23, 2021 7:24 AM
To: Takeda, Michi
Subject: Affinity project on Arroyo Parkway

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I am writing in support of the proposed Affinity project on Arroyo Parkway.

I have lived and worked in Pasadena for over 40 years. The housing shortage continues to challenge our community and this project would allow older homeowners a viable option to move from their homes and remain within Pasadena. As an active Realtor in the area, I know that where to relocate if they were to sell, is a major concern with these seniors.

I have reviewed the plans and believe this medical and assisted living project is long overdue. These are complimentary uses, tied together with a very attractive courtyard between the historic buildings. This project will provide an ideal environment for people in the assisted living building to get together with family and friends, and to remain in the community they love. The medical/research building achieves the right level of prominence for this location, while still fitting in.

The thoughtful design will also encourage pedestrian activity down Arroyo Parkway from Old Pasadena. Having a Metro Station on each side will minimize traffic, which is also the right approach in this area.

Please work closely with the developer team to make any necessary refinements, and help make this project happen soon. It would be a terrific addition to the area and help with our shortage of single family homes.

Darrell Done

Coldwell Banker Realty

Sales Manager

Global Luxury Director

Architectural Properties Specialist

CalRE #01233781



GLOBAL
LUXURY

City of Pasadena Design Commission

Attention: Michi Takeda
Hale Building
175 N. Garfield Avenue, 2nd Floor
Pasadena, CA 91101

RE: 491-577 S. Arroyo Parkway Project

Dear Commissioners:

As a Pasadena resident, owning part of an historic building, (Pasadena's first co-op, The Barcelona,) I write to support the Affinity Project on Arroyo Parkway.

Pete Kutzer is the kind of developer that has a "goodness of fit" for Pasadena. When I was president of the South Pasadena Chamber of Commerce from 2003 to 2015, we got to know each other, and watch as three high-quality firms attempted to create an appropriate infill project called Downtown SouthPas. It was sensitive and right-sized for the community. Yet, all were pushed away for fear of change. Today, that same site is a sensitively designed and vibrant corner at Fair Oaks and Mission – a product of The Kutzer Company, who knew how to proceed to get both residents' embrace and commercial viability.

Pete and I met before the Pandemic and discussed The Affinity plans. Recently I reviewed the project again. It looks like an excellent mix of senior housing, medical offices and retail. It's close to the Metro Gold Line stop at Del Mar Station, and Metro buses 177 and others on Del Mar, as well as Pasadena Transit bus stops on California and S. Arroyo Parkway. If you conclude that the design respects the vision of the Design Review Board in preserving Arroyo Parkway buildings, concentrating the taller buildings near the Gold Line, and providing walkable, pedestrian friendly perimeter, then there are good reasons to approve these plans.

Pasadena, like many California communities, is trying to respond to housing demands, without destroying our neighborhoods. We're even opening up for ADUs. We've allowed density bonuses for housing on all three sides of me – blocking a once protected sightline of the City Hall dome and San Gabriel Mountains, for Barcelona Owners.

I do not see similar downsides to the Affinity. Instead, this proposal brings in a solution for Pasadena's families, with specialized housing, so they can stay local as they transition in their lives. Since it also brings in a healthcare component, it feels like a two-for one deal.

Thank you volunteering, for guiding Pasadena with design sensitivity as well as allowing for commercial viability. When a developer with a track record of respectful, right-sized, historically sensitive projects, such as The Kutzer Company, seek approval – I am very confident, and offer my support. I am at 626-710-2360 if you'd like to reach me.

Sincerely,


Scott Feldmann
The Barcelona

cc: Pete Kutzer

May 18, 2021

City of Pasadena Design Commission
Attn: Michi Takeda
Hale Building
175 N. Garfield Ave. 2nd Floor
Pasadena, CA 91101

RE: 491-577 S. Arroyo Parkway

Dear Members of the Design Commission:

USC Chan Division of Occupational Science and Occupational Therapy is invested in supporting people of every age can enjoy life to the fullest. Our vision aspires to promote community, work, and living spaces that are inclusive and health-promoting, which includes attention to the design and flow of the physical space to craft a future environment where people thrive. In harmony with this vision, the Occupational Therapy Faculty Practice (OTFP) consults with organizations and communities that share our vision and core values that strive to create inclusive environments that consider the range individual needs across the lifespan. Specifically, we recognize that the health of the individual is in part constructed by a reciprocal interaction with their environment. While environmental adaptations are not novel in the realm of health and safety, OTFP supports the creation of environments that enhance well-being rather than solely decrease risk to health.

With this in mind, we have been supporting the applicant's team in the design of the Affinity Project in considering how community members might manage their physical health and mental well-being within the site (e.g., exercise facilities, community space, green space), how to facilitate safe and efficient navigation of the environment for individuals of all ability levels (e.g. cognition, vision, mobility), room designs that support open communication, and other health-promoting design choices. Throughout the last year, OTFP has been working with the applicant's team on ideation, design, and layout to explore and implement best practices including the consideration of design principles that support inclusiveness and productive aging. OTFP finds that the project is exemplary in design and function to support ease of use and enjoyment for all members of the community including but not limited to those with limited mobility.

As a partner in this exciting project, we look forward to continuing our collaborative process until completion. We look forward to continued work ensuring that all aspects of the site have been thoughtfully considered with respect to the breadth of diversity and abilities.

Sincerely,



Marissa Marchioni, OTD, OTR/L, CEAS
USC Occupational Therapy Faculty Practice

[REDACTED]
[REDACTED]
marissa.marchioni@med.usc.edu

Takeda, Michi

From: Steve Mulheim [REDACTED]
Sent: Tuesday, May 25, 2021 12:09 PM
To: Takeda, Michi
Cc: [REDACTED]
Subject: Affinity Project on Arroyo Parkway - Design Review Comment

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City of Pasadena Design Commission,

I am writing in support of the proposed Affinity project at 555 S. Arroyo Parkway. As the President and CEO of the Old Pasadena Management District, I have more than 15 years of experience in Pasadena, and have been fortunate to support the positive evolution of the community. I also have known the local principals (Pete Kutzer at Edgewood and Patrick Chraghchian at Adept) for many years, and have seen the quality and success of their projects, especially in thoughtful design that activates the streetscape and the surrounding areas.

While this project is not located within Old Pasadena and my Board has taken no official position, I believe that Affinity's combination of uses - including medical/research and assisted living - is particularly needed in Pasadena, and putting them next to each other near the Metro is a terrific idea. I especially appreciate the preservation of the historic buildings, the inviting common areas, and pedestrian-friendly nature of the improvements.

I look forward to the Affinity receiving all necessary approvals, and the positive impact it will have in the neighborhood, and in Pasadena as a whole.

Thank you,

Steve Mulheim
President & CEO
OLD PASADENA MANAGEMENT DISTRICT



 Please consider the environment before printing this e-mail

Takeda, Michi

From: Paul Little [REDACTED]
Sent: Tuesday, May 25, 2021 11:46 AM
To: Takeda, Michi
Subject: Support for Affinity Project on South Arroyo Parkway

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City of Pasadena Design Commission
Attn: Michi Takeda
Hale Building
175 N. Garfield Ave., 2nd Floor
Pasadena, CA 91109

Hello.

The Chamber of Commerce and Civic Association of Pasadena fully supports the project at Arroyo Parkway and Del Mar Boulevard.

The project will be attractive and re-energize an area that has fallen to neglect in recent years. Several aspects of the project will be significant and positive additions to Pasadena.

Thank you,

Paul Little
President and CEO

Mary Frances Schillaci

Pasadena, CA 91105

August 8, 2021

City of Pasadena
Planning & Community Development Department
175 North Garfield Avenue
Pasadena, CA 91101

RE: The Affinity Project Planned Development #39 – Providing Housing for Seniors

Planning Department:

The Affinity mixed-use development project, addresses two critical needs of The City of Pasadena. One, the need for additional medical office space for our growing medical and technology industry and two, housing for seniors.

Pasadena has among the highest concentrations of residents aged 50 and older in the Los Angeles region. According to market research, the Independent Living vacancy in 2019 was 0.5% for Pasadena. The Affinity will provide a much-needed option for people who wish to remain in the community as they age.

An added benefit, is its location near mass transit. Residents will have access to destinations throughout southern California and can possibly forego the need to own a vehicle. Proximity to the Metro line, also provides convenient access to onsite medical facilities to the broader community as well as nearby residents.

This seems like a great project for the Arroyo Parkway corridor.

Sincerely,


Mary Frances Schillaci

Takeda, Michi

From: GREGG SMITH [REDACTED]
Sent: Monday, May 24, 2021 4:52 PM
To: Takeda, Michi
Cc: [REDACTED]
Subject: Fwd: Affinity Project on Arroyo Parkway

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Sent from my iPad

Begin forwarded message:

[REDACTED]

Subject: Affinity Project on Arroyo Parkway

Dear Michi:

My brother and I are the tenants across the street from the proposed project, the Affinity Project. We own the Parkway Grill and the Arroyo Chophouse restaurants and we feel that this project is sorely needed in our great City.

As is apparent, the buildings that occupy the real estate in question have been dilapidated for years and have been an eye sore and in need of some much needed reimagined/vital new uses.

I can not think of a better location for Medical, Research and Assisted Living uses that have synergy that works extremely well together.

I very much like the plans for preserving the two historic structures across the street from our restaurants and using the courtyard between them as the public center of the project.

I also feel that the development is the perfect fit for that corner, and will bring the kinds of jobs and economic activity that has been missing for the last couple of decades.

I feel that the proximity to Huntington Memorial Hospital is ideal.

My brother and I have hosted our Fall Food and Wine Festival at Parkway Grill and the Chophouse for the past 37 Years with all proceeds going to the Hospital. The funds have generally gone to the Trauma Center as more and more hospitals have closed theirs due to the expense involved in operating their own. This has been a very important endeavor for us, as one never knows when a family member or loved one may need to go to a Great Trauma Center.

In my opinion this project is long overdue.

We are 100% in favor of the Affinity Project.

Best to you,

Gregg Smith

Sent from my iPad

Takeda, Michi

From: Julianne Worrell [REDACTED]
Sent: Monday, May 24, 2021 11:11 AM
To: Takeda, Michi
Cc: Pete Kutzer
Subject: The Affinity Planned Development, 555 S. Arroyo Parkway, Pasadena

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Attention:

City of Pasadena Design Commission
Michi Takeda
Hale Building
175 N. Garfield Avenue, 2nd Floor
Pasadena, CA 91101

Dear Commissioners:

I am a 34 year resident of Pasadena and a former commissioner in the City. I therefore appreciate what you do and the time that you devote to reviewing and considering projects for our City.

I am writing to you to express my opinion that an assisted living project is an important component for our City now and in the future. We all are aging and at some point, many of us may need a place where cutting-edge healthcare and research is available outside the hospital environment. It is then, if not right now, when we would look to The Affinity, and find a well designed, state of the art and (travel) accessible resource.

I have reviewed the Affinity Planned Development proposal and appreciate that it makes very good use of the space at 555 S. Arroyo Parkway. The location is very appropriate for access given the Gold Line stations, reducing potential traffic. The building designs works well with the existing historic structures and, being a fan of natural light and outdoor spaces, I again think this design (incorporating courtyards, and extensive landscaping) provides a very inviting atmosphere for potential residents as well as the entire community, if and when they have an opportunity to visit the facility.

I think The Affinity Planned Development would be a welcome asset to the City, for all residents now. With the evolving and expanding world of healthcare, it should also provide great potential for the future.

Thank you again for the time you are devoting to the review and consideration of this project.

Varsh, Tess

From: Andi Ceragioli [REDACTED]
Sent: Wednesday, August 11, 2021 12:00 PM
To: Varsh, Tess
Subject: The Affinity Project - Planned Development #39 (465-577 S. Arroyo Parkway) - comment letter
Attachments: Michelle Ficarra.pdf

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Hi Tess Varsh:

Attached is a letter in support of the Planned Development Project (#39) which will be considered by the Pasadena Planning Commission today, August. 11, 2021.

Thank you.

ANDI CERAGIOLI



GOVERNMENT & COMMUNITY RELATIONS
PUBLIC AFFAIRS
LAND USE ENTITLEMENTS

ADVOCACY

Results Matter. 

Michelle Ficarra

[REDACTED]
Pasadena, CA 91107

August 11, 2021

City of Pasadena
Planning & Community Development Department
175 North Garfield Avenue
Pasadena, CA 91101

RE: PD#39 - Affinity Project – 465-577 S. Arroyo Parkway

Planning Commissioners:

Frequently the need for more housing is in the news. However, we don't often hear about the need for new housing for seniors. The Affinity Project is a mixed-use development that will provide both assisted and independent housing options for seniors. The project will also include much needed medical office space in the growing medical and technology corridor near Huntington Memorial Hospital.

I think this project will be a welcome addition to the area that will provide health and wellness services to residents and the greater community as well. I hope to see the project move forward in a timely manner so we can see the positive economic benefits this plan will bring to our town.

Best regards,


Michelle Ficarra



August 10, 2021

Planning Commission
City of Pasadena
100 North Garfield Ave.
Pasadena, CA 91101

Re: 491-577 Arroyo Parkway

Dear Commissioners

Livable Pasadena is very concerned about the proposed project at 491-577 Arroyo Parkway. This massive project would substantially change the feel of a major entry point to Pasadena. It would transform Arroyo Parkway from a commercial district into a medical care corridor. The project also would dramatically increase our water usage, which we already are being asked to reduce. The impact this project would have on our water should be studied as part of the EIR.

As designed, this project would loom over everything nearby. There are very little setbacks and practically no green space. There are two landmark districts and a historic district within a block of the proposed project. And yet there are no proposed buffers between this gigantic development and the existing adjacent neighborhoods. The neighborhoods, and the livability of this area, need to be protected. The proposed project should be held to the fifty feet requirement in that area and should be required to maintain setbacks. This is essential to maintain the trees, sidewalks, and neighborhood feel of the area.

This proposed project also would negatively impact the surrounding area by adding significantly to the noise, lighting, and traffic on already congested streets. The surrounding neighbors now fight high traffic volume and traffic congestion along Marengo, California, and the surrounding streets. The streets are not going to be able to absorb the car traffic envisioned by the developer. Increasing traffic not only impacts the commuters in the immediate area, but also would push increased traffic to surrounding streets and could affect the safety of all pedestrians, bikers, and other drivers. We urge the Planning Commission to require traffic impact studies before any project of this magnitude is considered. The streets in question here already are operating at an LOS of F. The study should consider how to mitigate the impact of traffic or the area will become completely impassable.

Traffic is a very serious consideration in Pasadena. Livable Pasadena raised community funds to do a traffic study, looking at traffic conditions and traffic operations in Pasadena – particularly in light of the large development projects that are being proposed. The study examined traffic as a system, rather than narrowly looking at a single intersection. It is important to look at traffic as a whole and how it interconnects. The single LOS statistics for any given intersection may hide real problems because the LOS (such as in the city's

traffic studies) is reported as the average of all four-intersection approaches. For example, you can have a LOS F on one approach with cars backed up and waiting through multiple signal cycles, and a free-flowing LOS A on another approach. The average of these two intersections would be LOS C, which could be viewed as adequate. Traffic reports that only show the overall average LOS will gloss over the real problems. The impact of new development, and the resulting additional traffic, could be under-estimated and would negatively impact an already bad situation. This traffic study also looked at traffic conditions leading up to an intersection, including the long delays of some approaches. We observed, for example, that at the intersection of Arroyo and California cars are waiting up to 4 signal cycles. This can result in aggressive driving, in which cars are running red lights trying to get through the signal rather than wait another light. This makes a very unsafe situation for pedestrians, people on bicycles, and other drivers. And this is before the dramatically increased traffic that would come with the proposed project. We hope that the city will take seriously the findings of this study and will incorporate these issues into the scope of the EIR.

Finally, Livable Pasadena supports the important concerns raised by the Magnolia Landmark District and supports the Planning Commissioners' proposed moratorium on Planned Developments. As explained by the Magnolia Landmark District, the proposed project conflicts with the development goals of our General Plan. The project undeniably will increase the daily car trips throughout Pasadena and does nothing to help alleviate the need for car related travel. Adding 650 parking spaces does not Pasadena more walkable. Is this what was envisioned in our Mobility Element? Certainly, the answer is no. We urge the Planning Commission to require the developer to bring this proposed development in-line with our General Plan. Indeed, the proposed moratorium on planned developments would allow the city the time to ensure that there is consistency between developments and city planning documents. Planned Developments, by their very nature, directly impact large portions of Pasadena. It is critical that they align with our General and Specific Plans.

Thank you,

Megan Foker

On behalf of Livable Pasadena

Varsh, Tess

From: Grant Johnson <>
Sent: Tuesday, August 10, 2021 8:07 PM
To: Varsh, Tess; Van Patten, Jason; Reyes, David
Subject: Comments submitted for Planning Commission Aug 11 meeting
Attachments: PRISM COMMENTS on Planned Development #39 - Affinity Project for LIVABLE PASADENA.pdf

Follow Up Flag: Follow up
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To whom it may concern:

I am respectfully submitting my comments for the Planning Commission meeting to be held August 11, 2021, pertaining to the Planned Development #39 - Affinity Project, and have attached this comment letter to this email, to be officially entered into the record. I work for Pasadena residents in the "Livable Pasadena" group as a Traffic Engineer, registered in the State of California, and am an Expert Witness in Traffic Engineering and traffic studies.

Grant

--

Grant Johnson, TE
Principal



August 10, 2021

To:

Planning Commission
City of Pasadena
100 North Garfield Ave.
Pasadena, CA 91101

RE: City of Pasadena, Planning Commission Meeting
To be held on August 11, 2021 for the purpose of scoping an EIR for the
Planned Development #39 - Affinity Project

Dear Honorable Planning Chair and Commissioners,

“Livable Pasadena” has previously hired PRISM Engineering to conduct a comprehensive traffic study to determine measured real-world traffic conditions in the City. This study was previously submitted to the City (dated 3/14/20). I am referencing in this letter the online location where this document can be downloaded again as needed:

<http://www.prism.engineering/pasadenatrafficvids.html>

I have been asked by “Livable Pasadena” to comment on the salient concerns relating to traffic conditions and impacts that could be anticipated by the proposed ***Development #39 - Affinity Project***. The project will be located along the west side of Arroyo Parkway between E. Bellevue Dr. and E. California Blvd., and will construct an additional 154K SF of Medical Office building, a 184K SF Assisted Living building, 197 new DU, and 650 additional parking spaces, bringing the project block total to 850 parking spaces, mostly for cars, in 5 levels of underground garage.

Comment #1

By its very design and plan, it seems that the project’s focus is to become a huge magnet for cars, by providing 850 parking spaces in such a small area of the City. The City has been working for more than a decade to become a city that depends less on the car, so this project seems to actively fight against that stated goal, and in fact would help defeat it. In the City’s ***General Plan Mobility Element*** there is a stated goal or guiding principle to make the City of Pasadena “***a city where people can circulate without cars***” (*Principle 5 of 8 Guiding Principles in General Plan Mobility Element*). The project does not seem to be even remotely compatible with the City’s stated goals, as contained in the General Plan legal document. “Vehicle Traffic” is a major component of this project with 850 parking spaces (200 existing and 650 additional), and as such will have a huge traffic impact to Arroyo Parkway and any nearby intersections, because it will be bringing into an already extremely congested LOS F roadway system, 650 more cars, possibly every hour on the hour, depending on turnover times in the



850 space parking garage. These additional thousands of vehicles per day will create a potential *safety-compromising* impact (an EIR impact that must be examined) to the local intersections surrounding the project. One of these intersections on the southeast corner of the project has already been identified as extremely overly congested (E. California at Arroyo) with LOS F conditions. There have also been several accidents at or near this intersection over the past few years that include rear end accidents on Arroyo, a broadside accident on California striking the Light Rail Train, and several last minute high risk intersection turns (relating to running of red lights on account of extreme congestion) in the intersection. Many injuries have been the result of these accidents (which are easily searchable on the State's traffic accident database system). There is a pattern of accidents at this location, and possibly others nearby as well.

Comment #2

During an am peak hour or a pm peak hour, often a parking garage experiences its greatest inbound and outbound traffic flows. In an 850 space parking garage related to homes and doctors, these parking spaces will likely empty and fill up several times in a day. In other words, it will be more than 850 cars coming and going in an hour, but much higher on a daily basis. This should be studied as part of a comprehensive traffic study, to see where these cars can possibly come from, and where they can exit, in order to lessen the extreme impact that is anticipated. Traffic on Arroyo and California is already at peak congestion levels, with cars missing the signal cycle nearly as a default now. Adding an additional 650 cars to the mix will have uncertain results, but it will most certainly be LOS F much worse than the LOS F that already exists (over 3 signal cycles delay for Arroyo traffic). It will likely result in more drivers becoming more aggressive, impatient, taking chances, running red lights, or hitting a train, or a pedestrian, or a cyclist. This project will bring so much traffic to the immediate area surrounding the project that the area will become even more unfriendly to bikes, peds, and cars as well. It will result in too much traffic.

Comment #3

When traffic volumes in a congested area become too high, the solution of the past has been to build bridges, build a freeway, or an expressway, in order to reduce the number of conflicts of high volumes of traffic. When traffic volumes are allowed to cross paths, when the volumes are extremely high, this creates a dangerous condition. It creates aggressive driving. The opposite of traffic calming will occur. The City, if they approve this project, would be obligated by its own General Plan to mitigate the traffic impacts and to find solutions where the vehicle traffic will not thwart the stated goals of the General Plan Mobility Element (to create a car-free circulation option). In addition, the EIR would need to address the obvious impacts to safety that will occur in the future should the parking be allowed. Traffic accidents and congestion are already at unacceptable levels. Increasing the traffic by 650 cars is an extremely high number of cars to add to a congested roadway system.



Comment #4

VMT (Vehicle Miles Traveled) is an environmental impact addressed in an EIR. This project, with its 850 parking spaces, will significantly increase the VMT to the area surrounding the project. The project's density cannot possibly be any real-world "offset" to the very real and significant traffic and safety impacts that will simultaneously take place, as a direct result of the project. The huge increase to vehicle miles traveled (VMT) coming into the area as a result of 850 parking spaces in a highly concentrated area will be an impact that cannot be mitigated without significant infrastructure changes (including building bridges, and eliminating traffic signals and resulting delays). This vehicle magnet (the parking garage), to be located in one of the most congested areas of the City, seems like a plan that is highly incompatible with the City's stated goals and guiding principles as contained in the City's General Plan, as well as the Mobility Element.

Respectfully submitted,

Grant P. Johnson, TE
Principal Engineer
PRISM Engineering



This comment letter has been prepared and certified by Grant P. Johnson, TE, Principal. Lic #1453

for:

LIVABLE PASADENA



PASADENA, CA 91105

www.prism.engineering



PRISM Engineering
Comments on EIR Scoping for Planned Development #39 - Affinity Project, Pasadena, CA



August 25, 2021

Att: Jason Van Patten

Senior Planner
City of Pasadena
Planning and Community Development Department
175 North Garfield Ave.
Pasadena, CA 91101

Re: 491-577 Arroyo Parkway

Dear Mr. Van Patten:

Livable Pasadena would like to submit the following additional concerns and requests for inclusion in the EIR for the proposed project.

First, we believe that, as a threshold issue, the drafting of an EIR for this project is premature. The proposed project is not “stable,” which is a requirement under CEQA. CEQA requires that an EIR contain “[a]n accurate, stable and finite project description.” (*Cty. of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193; see also *Washoe Meadows Community v. Department of Parks and Recreation* (2017) 17 Cal.App.5th 277, 288; CEQA Guidelines § 15124.) For example, in the recent case, *Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1 (“*Millennium*”), the court held that a project description was inadequate under CEQA when the EIR failed to specify “the siting, size, mass, or appearance of any building proposed to be built at the project site” and only provided an “impacts envelope” with “conceptual” designs. (Id. at 18.) The developer at issue here has presented two different concepts for their proposed project, resulting in an inconsistent and unstable project description. That could trigger different building designs and different physical layouts, which could result in significantly different project impacts. Until the physical concept is firm, the project does not qualify for an EIR under CEQA.

Furthermore, the purpose and intended use of the project still is uncertain. The developer has proposed several different uses for the project space and has not settled on a final project. The change of the use could dramatically change the impact the project has on the community. For example, various projects could differ greatly in the use of water, the impact on traffic, and the impact on air quality. Therefore, until the proposed project is clearly defined, both in physical planning and in use, an EIR is premature. Once the project is finalized, the EIR will have to include all possible projects and all possible building specifics. Currently, however, it is just too early to move to the EIR drafting stage. Without a firm physical concept and clearly defined use for the project, an EIR would fail to meet CEQA’s fundamental purpose to “provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment.” (Pub. Resources Code, § 21061.) The unstable project description included in the initial study fails to meet CEQA’s public disclosure objectives.

If the city is determined to continue with this project and draft an EIR, Livable Pasadena urges the city to include a study and analysis of the impact this project would have on our water and on the heat index. Only a week ago, the City Council announced a dire water shortage and increased city-wide restrictions on water consumption. This alone should be enough of a reason to add a study of the impact on water usage to the EIR. We asked for a full water analysis in our earlier letter, and we reiterate that request here. We also have asked City Council to require a water use analysis for all projects. The potential impact of this massive project on our water supply is too great to ignore. The project proposes development with significantly more density than included in any approved land use plan for the city and thus would not have been included in the city's urban water management plan. Due to the high levels of water usage that would be required for medical and assisted living uses, preparation of a water supply assessment or other water use analysis must be included in the EIR. Just because the impact is unknown does not mean that the impact goes away. Pasadena cannot go into the project blind.

Climate change is very real. Adding a project of this magnitude with limited green space, while also taking away existing mature trees on the site, will only exacerbate the problems we are facing with increased heat. We will lose the shade giving and cooling impact on our neighborhoods from mature trees and green planting. The proposed above ground tree boxes will not make up for this loss. The result will be increased concrete area, increased car emissions, and an increased heat index. We would be creating an urban heat island effect, which is intensified in areas with large swaths of concrete or blacktop. An urban heat island is described as "dense urban areas with fewer trees, less green space, more buildings, higher energy use, and more impervious asphalt and concrete. These characteristics create urban heat islands where nighttime temperatures may be as much as 22°F higher than surrounding areas." *Climate Change, Health, and Equity: A Guide for Local Health Departments* (2018)¹. This study also demonstrates that increased heat levels can result in significant health impacts. CEQA requires an EIR to analyze health impacts as well as increased energy usage. (CEQA Guidelines § 15126.2 [EIR must analyze "health and safety problems" resulting from the project]; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 510; CEQA Guidelines App. G, VI.) The impact this project would have on our heat index, therefore, should be carefully considered as part of the EIR.

We ask the city to slow down and require a fully developed project before moving to the EIR planning stage. Once the drafting of an EIR is appropriate, we urge the city to include a study of the impacts this project will have on our water and on our heat index, as well as the other concerns raised in our earlier letter.

Megan Foker
On behalf of Livable Pasadena

¹ available at:
https://www.apha.org//media/files/pdf/topics/climate/guide_section4.ashx?la=en&hash=118F4FD2E4719EF51A76C0B0865BAEF57BEB7EDB ("*Climate Change, Health, and Equity*".)



M A D I S O N H E I G H T S
N E I G H B O R H O O D A S S O C I A T I O N
686 South Arroyo Parkway Suite 199 Pasadena, CA 91105 www.mhnapasadena.org

August 10, 2021

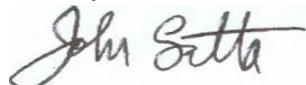
Planning Commission
City of Pasadena
100 North Garfield Ave.
Pasadena, CA 91101

The Madison Heights Neighborhood Association is disappointed to see this planned development moving through the city process so quickly. As you can imagine, MHNA residents are surprised by and deeply concerned about what is currently proposed. The loss of 23 trees alone is a considerable issue, but the addition of 650 new parking spaces, traffic, loss of mountain views, limited walkability, minimal addition of green space, and lack of community outreach are also serious problems. These seem to violate key tenets of the City's General Plan, especially the mobility element and protecting single-family neighborhoods. We hope the city and commission will find a way for the environmental report to respond to the following concerns:

1. How will residents of MHNA be able to access transportation resources as the area becomes severely impacted by the number of vehicle trips this project will produce?
2. Will the cumulative impacts of ALL future development adjacent to the area be studied?
3. How will this project enhance the surrounding historic neighborhoods and not overshadow established single family areas?
4. How will the City address the water issue, considering we are already being asked to limit our use?

Pasadena is a great city, and our residents should be heard to help keep it that way.

Thank you,



John Latta



August 10, 2021

Planning Commission
City of Pasadena
175 North Garfield Avenue
Pasadena, CA 91109

RE- 465-577 Arroyo Parkway

The residents of Magnolia Avenue are alarmed by the planned development proposal to build both a 154,000 square-foot medical office building and a 184,376 square-foot, 92-unit assisted living complex (complete with 850 parking spaces) just a block and a half from our historic boundaries.

This project does not adhere to the goals of our General Plan, which aims to make Pasadena a city where people can circulate without cars. Non-auto travel is emphasized in our General Plan in order to recognize the goal of improving Pasadena's environment and quality of life, but medical office use is one of the highest trip-generating uses with employees and patients coming and going all day. Consider the services that are required for this type of care facility and medical office:

- Arrivals and departures of staff three times per day for caregiver shifts, as well as daily shifts of administrative, nursing, housekeeping, food service and maintenance departments;
- Daily deliveries of food, pharmaceuticals, and supplies;
- Multiple trash pick-ups for regular trash, medical waste, and recycling;
- Visits by the family and friends of as many as 100 residents;
- Regular visits by medical professionals, social workers, therapists, nurses, care managers, hospice staff, fiduciaries, consultants, entertainers, etc.;
- Technician visits for maintenance of facility equipment, resident TVs, telephones, computers, etc.;
- Occasional movers for residents moving in or out; and
- Emergency vehicles at any time of the day or night. (This happens because facility procedures require that whenever a resident has a fall and there is an injury, or if a resident suddenly has a serious health condition, facility staff are required to call 911, which almost always results in blaring sirens.)

All of these activities will transform the adjacent historic neighborhoods of quiet streets and single-family homes into very busy and noisy living environments. Why not plan this development near Huntington Hospital, where the zoning, streets, and infrastructure are already in place to support this type of traffic? The truth is that Arroyo Parkway was never meant to be a medical corridor or accommodate such massive transportation needs. This is the wrong place for this complex especially with the Metro train crossing. We ask this commission to closely look at the intersection of Marengo and California for safety purposes for all transportation uses. This intersection frequently backs up from the train crossings and is unsafe for bikes, walkers and cars. Safety IS an environmental impact and must be reviewed closely for this project to proceed.

Pasadena Land Use regulations were meant to help neighborhoods evolve without sacrificing their unique characteristics or charm. The sheer number of parking spaces alone proves that there is no intention of reducing car usage for this proposed development. This proposed use will erode our surrounding historical neighborhood if it moves forward, and therefore the commission must find a way to focus on reducing car usage for this proposed development.

The other issue that needs to be addressed is of the concern that we already have so many skilled nursing and assisted living facilities within our city limits, specifically along Fair Oaks. We appreciate the present need for elder care right now, but this commission needs to ensure we are not creating an over-abundance of this type of facility in our city.

As with so many other cases, it seems that the guidance of our General Plan is thrown out the window and properties are green-lit for whatever a developer can dream up. This planned development is completely incompatible with our General Plan, which promises to *protect* the character of our neighborhoods. This commission needs to appreciate and respect the differences between healthy, comfortable residential neighborhoods, and thriving commercial districts. We wholeheartedly agree with the handful of commissioners who would like to consider suspending PDs until the specific plan process is complete. We must ensure this idea of a high-growth, high-density model for Arroyo Parkway and South Fair Oaks Specific Plan has been thoroughly discussed throughout our community before moving forward. As of now, public participation has been down for the last year and a half due to COVID and most local residents are not even aware of this massive project.

This development is too tall, lacks enough green space, and will cause massive use of cars next to our neighborhood. This part of Pasadena does not have the proper infrastructure to support such an endeavor, and we are concerned that all of this new traffic will make it nearly impossible for residents to access adjacent roads for our own transportation needs. Please help.

Thank you for your consideration,
Residents of Magnolia Landmark District

Varsh, Tess

From: Chuck Livingstone [REDACTED]
Sent: Wednesday, August 11, 2021 3:17 PM
To: Varsh, Tess; jvanpatton@cityofpasadena.net; Reyes, David
Subject: Fwd: Message from KM_C450i left
Attachments: image001.jpg; SKM_C450i l21081115100.pdf

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Letter from Pasadena Beautiful Foundation regarding 465-577 Arroyo Parkway

----- Forwarded message -----

From: [REDACTED]
Date: Wed, Aug 11, 2021 at 3:11 PM
Subject: Message from KM_C450i left
To: [REDACTED]

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Best Regards,



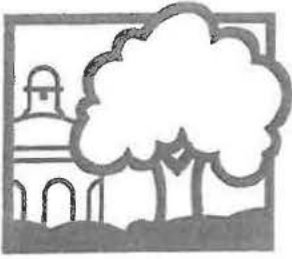
Charles "Chuck" Livingstone
Realtor

[REDACTED]
[REDACTED]
[REDACTED]

CalRE# 01203399



Coldwell Banker Realty



Pasadena Beautiful Foundation

"Protecting Our Trees"

August 11, 2021

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Vice President — Suzi Miller
Secretary — Patricia Lyon &
Joyce McGilveray
Treasurer — John Poer
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Planning Commission
City of Pasadena
175 North Garfield Ave
Pasadena, CA 91109

RE- 465-577 Arroyo Parkway

In review of the proposed 154,000 square-foot medical office building and a 184,376 square-foot, 92-unit assisted complex (complete with 850 parking spaces) just a block and a half from historic boundaries. Also, not to mention next to the Goldline, one of the busiest intersections in Pasadena. Not to mention the traffic issue, but consider the water usage associated with the medical aspect and the 92-units.

As past President of Pasadena Beautiful Foundation, I ask that consideration to the design to include a design more compatible to Pasadena's historic contribution to trees and garden design, not a commercial design building that is out of touch with Pasadena's historic architectural status. Pasadena has a well known history with trees and plantings that enhance our values and enhance the City of Pasadena. Look at the Neuroscience Building at Cal Tech on the corner of Wilson and Del Mar Blvd, also to mention the HMRI building on S Fair Oaks, and the Kaiser Medical on the corner of Green and Los Robles. great examples of design that compliments the City of Pasadena. We need to consider more green space in the final, overall design.

In as much the EIR meeting is occurring tonight, I would suggest that an EIR of water usage be addressed too.


Chuck Livingstone

Past President



August 10, 2021

Planning Commission
City of Pasadena
100 North Garfield Ave.
Pasadena, CA 91101

Re: 465-577 Arroyo Parkway

Protect Pasadena Trees is an organization which works to maintain and encourage a healthy tree canopy within Pasadena boundaries. It is imperative we ensure that the city we pass down to our children isn't made of just parking lots and concrete developments as we grow to provide more commercial districts and housing. The planned development for 465-577 Arroyo Parkway is very concerning to our organization because there are areas within the plan where setbacks are set at zero along Arroyo Parkway which does not allow for in-ground tree planting anywhere around the periphery of the development.

Our new specific plan must adopt more stringent policies on tree planting and protection both on public and private property, including the following:

- We should not allow subterranean garages from going lot line to lot line, destroying all trees on the property;
- We must require planting of large trees between building lot lines to create an urban canopy within dense urban areas;
- We must require street setbacks to be changed to encourage the integration of trees into new development plans, and the city must show demonstrated effort in encouraging the developer to design with trees in mind. It is concerning areas adjacent to single family homes of Madison Heights would be directly abutting such drastic concrete deserts

City staff and council are responsible for protecting us from development that contradicts this fundamental imperative. While our city does have some tree ideals in place, it is clear they are not enough, particularly in the Central District and South Fair Oaks Specific Plan. The city needs to take a stronger stance on incorporating mature trees into our urban center. We must create a city that has strong urban forestry efforts with dense vegetation and a beautiful urban canopy. We need to band together and insist on stronger and more stringent views towards our urban canopy.

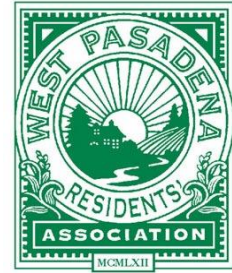
Aside from diminishing the beauty of the city's streetscape by requiring zero setbacks, maintaining mature trees has the practical and effect of reducing the heat island effect, which occurs in cities with an excess of concrete and a shortage of vegetation. Many communities are now taking steps to reduce urban heat islands through policy initiatives which include stronger tree and landscape ordinances, comprehensive plans and design guidelines protecting trees, and zoning codes which provide enough perimeter around new buildings to plant trees in order to create canopies. If we don't follow suit, we are putting at risk the trees that provide the

evaporative cooling needed to keep our urban heat island index low. We have all experienced the high temperature and pollution of those hot summer days in our city, and the removal of trees has been a major contributor. The current solution adopted by developers, potted plants on concrete, will never provide protection from growing urban heat islands the way a mature canopy of trees will.

Pasadena has been purposefully developing a tree canopy since 1855, when trees were first planted along city streets. Since the city is in the midst of revising all of the Specific Plans, we as citizens need to question this policy of urban edge development as it relates to our tree canopy. We have an opportunity to voice our concerns and shape the guidelines that will affect our city for decades. All future big developments like 465-577 Arroyo Parkway must take our tree canopy into consideration. It is the city's duty to protect its current residents from development that might hinder the livability of our city which includes a healthy and walkable environment.

Thank you,

Frances Morrison, on behalf of Protect Pasadena Trees



September 2, 2021

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”

Dear Mr. Van Patten:

The WPRA contends that the drafting of an EIR for the Affinity Project is premature and will not be acceptable until the developers define and commit to the use of Building A. According to the project description published on Pasadena’s website:

...the proposed PD Plan would provide the flexibility to exchange the uses in Building A from medical office and ground floor commercial for the following:

- *3,000 sf of commercial and a sales/leasing management office on the ground floor;*
- *Up to 197 residential dwelling units;*

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.

Furthermore, the WPRA urges the city to include a comprehensive analysis of the impact this project would impose on our city’s water usage. A building of apartments and/or condominiums would have a much different water and sewer need than medical offices. Also, the traffic flow exiting and entering Building A would be different for living units than for offices.

Until the proposed project is clearly defined, both in physical planning and in use, an EIR is premature. The WPRA strongly encourages the City to press for focus on this project and publish the finalized use of Building A before progressing any further.

Thank you for your consideration of our point of view.

Respectfully,

A handwritten signature in black ink that reads "Dan Beal". The signature is written in a cursive style with a large initial "D" and "B".

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

C: Councilmember Steve Madison
Takako Suzuki, Field Representative

The WPRA is an all-volunteer organization dedicated to maintaining and enhancing the quality of life in southwest Pasadena. We represent over 7,000 households, including 1,000 paid members.

Varsh, Tess

From: Bazarevitsch, Natalie @ LA North [REDACTED]
Sent: Tuesday, August 10, 2021 11:29 AM
To: Varsh, Tess
Cc: Reyes, David
Subject: The Affinity Wellness Campus, Pasadena

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Good Morning,

As a long-time Linda Vista resident, I am in support of The Affinity Project on South Arroyo Parkway. The project will bring much-needed assisted living to the heart of the City, making it easier to stay in Pasadena near family as they age. My father is an assisted living facility, so I know how valuable they are to a community.

The new medical/research facilities within the project will provide a great boost to the medical research corridor. The timing for the project could not be better as we watch the healthcare and life sciences industries grow. It is exciting to see Pasadena at the forefront of this growth and for The Affinity to help make the long-time vision for this area a reality.

Best, Natalie

Natalie Bazarevitsch | Senior Vice President | Broker Lic. 01188604
CBRE | Advisory & Transaction Services | Investor Leasing

[REDACTED]

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From: [Nina Chomsky](#)
To: [Van Patten, Jason](#)
Subject: CEQA Scoping Comments: PD 39; Affinity Project
Date: Friday, September 3, 2021 2:51:18 PM

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Mr. Van Patton,

I am submitting CEQA Scoping Comments in my individual capacity, as follows.

1. I agree with, and support, the following comments of Livable Pasadena as to the asserted "Project Description":

. . . (T)he drafting of an EIR for this project is premature. The proposed project is not "stable," which is a requirement under CEQA. CEQA requires that an EIR contain "[a]naccurate, stable and finite project description." (Cty. of Inyo v. City of Los Angeles (1977) 71 Cal. App. 3d 185,193; see also Washoe Meadows Community v. Department of Parks and Recreation (2017) 17 Cal.App.5th 277,288; CEQA Guidelines § 15124.)

CEQA does not permit proposing a Project of several "alternatives". Therefore, NO EIR or other CEQA work should proceed until the Project Description is stabilized and finalized.

2. Historic Status/Aesthetics. The EIR must include a strong, robust Historic Resources Analysis for two reasons. First, some community Historic Preservation commentators in Pasadena question just how historic the two buildings are that are the basis of the claim for an increase in the allowable building height of other Project buildings. The massing and height of this Project is of community great concern, and any false use of historic status in this regard must be avoided. Therefore, a Historic Resources Analysis must study and analyze the historic status of the two buildings in question in detail.

Second, the EIR should include an Aesthetics section, or, if an Aesthetics section of the EIR is not "allowed" due to some state or CEQA law reason, then a strong, robust Historic Resources Analysis must be included in the EIR if there are historic resources on site in order to study and analyze issues that would otherwise be studied and mitigated through an EIR Aesthetics section; and/or, with or without historic resources on site, the Land Use and Planning section of the EIR should be expanded in order to study and analyze issues that would otherwise be studied and mitigated through an EIR Aesthetics section, including application of the applicable Specific Plan. Such issues include impacts of massing and height in relationship to setting, and adjacent properties and uses, whether historic or not; impacts on the surrounding street scape on both sides of Arroyo Parkway.

Thank you for your attention to these comments.

Sincerely,

Nina Chomsky

Varsh, Tess

From: Maggie Crawford [REDACTED]
Sent: Wednesday, August 11, 2021 10:53 AM
To: Varsh, Tess
Subject: Support for Affinity Planned Development #39

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Support for Affinity Planned Development #39

Dear Planning Commission:

I want to express my support for the proposed mixed-use development on Arroyo Parkway. This is an ideal location for a new medical facility, as it is in the heart of Pasadena's growing medical and technology corridor. The project also includes senior housing, both independent living and assisted living and memory care. Located near medical providers will make it very convenient for senior residents seeking medical care.

As a long time resident of Pasadena, over the years I've seen how Pasadena's medical industry has grown. I am the Training Consultant for Huntington Memorial Hospital's Pet Therapy Program and I can see the many benefits that this project will bring to the area. Not only will it serve Pasadena residents, but it will provide the resources needed to attract top medical professionals to our city.

This will be an exciting addition to our growing medical and health-care related industry and it has my support.

Sincerely,
Maggie Crawford
[REDACTED]
Pasadena, CA 91107

ERIKA FOY

PROTECTING PASADENA

August 6, 2021

Planning Commission
City of Pasadena
100 North Garfield Ave.
Pasadena, CA 91101

RE: 465-577 S. ARROYO PARKWAY

The citizens of Pasadena are alarmed by the proposed planned development as presented for 465-577 S. Arroyo Parkway. This plan is designed well beyond city infrastructure capacities, neither enhances nor encourages a small-town feel, is not of an appropriate scale for the surrounding historic neighborhoods, encourages very little green space, and will have a *devastating cumulative impact on traffic on every major intersection surrounding the area*. The proposed plan and resulting massive, densely populated project is immeasurably frustrating to residents who are watching their city being altered in ways they never imagined.

Overall, the buildings proposed for this planned development are too tall, too dense, and lacking the proper setbacks that make a neighborhood feel inviting. Let's not forget that the issues of density and traffic will only be compounded once all the development in the area is completed by adding additional projects such as 590 South Fair Oaks. Please refer to a traffic engineer [video](#) capturing the delay at the corner of Arroyo Parkway and California Blvd. from this last January of 2020. You will see the intersection fails close to four times. This development will not work within our city infrastructure and most elderly people struggle to get to the doctor by walking, bus or train.

In light of all we are learning now about the risks of high-density living, long-term exposure to poor air quality, and the relationship between building to the urban edge and the urban heat island index, I believe the citizens of Pasadena should be alarmed by the current plans for this development. This development does not reflect the Pasadena anyone has imagined; traffic snarled, too dense and a massive concrete jungle. Please help keep what makes Pasadena so special; trees, mountain views, easy access, historical framework and a small town feel.

Thank you for your consideration,

Erika Foy

Cc: David Reyes, Jennifer Paige, Mayor Victor Gordo, Vice Mayor Andy Wilson, Councilmember Steve Madison, Taka Suzuki and Pam Thyret

Varsh, Tess

From: Jim Gamb [REDACTED]
Sent: Tuesday, August 3, 2021 11:39 AM
To: Varsh, Tess
Cc: Reyes, David
Subject: Kutzer Co. Affinity Project

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As a long time resident of West Pasadena, member and board chair of HMRI, I am writing in support of this Kutzer Co. project. I have had an opportunity to review the plans and believe it would be a high quality addition to the development of the area near HMH and have a positive influence on adjacent property values.

As a real estate investor, I am very familiar with the expertise the Kutzer Co. brings to the development and management of like projects, and I urge approval of the Affinity development.

James(Jim) D. Gamb, CFA

Varsh, Tess

From: Akila Gibbs <AkilaG@pasadenaseniorcenter.org>
Sent: Tuesday, August 10, 2021 5:47 PM
To: Varsh, Tess
Cc: Reyes, David
Subject: Affinity Project

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Ms. Varsh,

(I am resending this email because the first I sent had computer problems)

As Executive Director of the Pasadena Senior Center, I know all too well the need for residential opportunities for older adults in our community which offer graduated care and memory care.

I've just viewed the presentation on the proposed Affinity Project on Arroyo Parkway. Not only was I pleased with their efforts to preserve those architectural aspects that are so important but also to create a multi-use structure that fulfills current needs for the residents of the Pasadena community. It's located in a part of Pasadena that allows older adults easy access to a variety of businesses and entertainment, thus encouraging residents to be active and engaged. It also maintains Whole Foods that has come to be an integral part of the Pasadena landscape and food resource. That section of land has been under-utilized for a very long time. I am in favor of the project as it is currently proposed.

Please feel free to contact me if you have any questions.

Most sincerely,
Akila



Akila Gibbs Executive Director
Pasadena Senior Center
85 E Holly Street, Pasadena CA 91103

P 626.685.6703 **M** 323.646.6834 **F** 626.577.4235
PasadenaSeniorCenter.org

KRISTIN TECHENTIN HARRISON

I was disappointed to hear that the project at Arroyo Parkway and California was up at the Planning Commission when our General Plan and our Specific Plan are not completed. As a homeowner who lives two short blocks away on Magnolia Avenue, I have been aware of and watching the project carefully since it is so obviously out of place for this location and intersection.

I believe that the people who are considering approving this massive of a structure on this very difficult corner have not been down to the site. This corner has the short, left turn bays on both sides of Arroyo Parkway, at California and Bellevue, due to the median down the length of the street. Those bays hold about three cars and then a back-up starts in the next lane to be able to take a left. This causes huge delays and then the Gold Line disruptions to the north/south flow adds to it. At Bellevue, there is a “No U Turn” posted on that signal, but people already do that maneuver and that is without the block being developed. My understanding is that the developers are relying on everyone accessing the building on the northbound traffic side from Bellevue and then traveling under the buildings and exiting on California where the cars are already backed up due to the Gold Line. I believe there is an exit and entrance on the southbound side of Arroyo, but that only allows one direction to head when leaving the campus. The ingress and egress for this large of a project is horrible. I also believe they have planned on having lighted walkways for residents to get to the other side of the street, mid-street. This will cause slower movement of traffic on Arroyo Parkway, which will cause drivers to start speeding through the adjacent neighborhoods. This is already something that we observe in Madison Heights between Glenarm and California during both morning and evening rush hours.

The traffic and noise from the elevated traffic for this corner is not my only concern, but it is a big one. The daily, hourly trips to doctors, hence the need for 650 parking spots, will make this critical Pasadena intersection even more congested than it already is, with drivers already having to sit through the light for three to four cycles to turn south onto Arroyo Boulevard from California Boulevard, as well as from Arroyo Boulevard east on to California Boulevard. After that turn there are the Gold Line tracks. Again, difficult congestion spots. This project with currently proposed entrances and exits, along with the added number of cars, trucks, and ambulances, will make this intersection even more congested.

The design of this building is not to scale with others in the area. Not only is it tall, it is so densely built, without any consideration for greenery, that it will

create an urban heat index. We need to require that anything built on this site has building setbacks large enough to be able to plant real trees in the ground and ones that can grow to two or three stories. We need them to do living roofs and they should be required to plant leafing trees in the sidewalk. This will help soften that urban concrete feeling that is happening all over the city, with new residential projects built right up to the sidewalks.

Two additional concerns are the parkway trees and sidewalks. The existing parkway trees are narrow and far between. This type of development usually only allows for plantings in pots. We need to insist that they do not build to the property line so that trees can be planted in the ground both up next to the building and in the parkway. It not only makes it more comfortable to walk for pedestrians, but trees soften the visual impact of the buildings. We need the sidewalks sufficiently wide enough and shaded to encourage pedestrian usage. This is already a heavily utilized street, and the safety of pedestrians should be of the utmost concern.

I have traveled and appreciated many cities that have had to deal with urbanization, and although Pasadena is not on the same scale as them, we seem to be doing a worse job. Both Seattle and Dallas have mature trees adjacent to both sides of their downtown buildings, which soften their impact on the urban environment. Their buildings are tall but with the tree canopy and the wide sidewalks it does not feel as urban as Pasadena is beginning to feel. If we have to develop, we need to control what we want it to look like, not just let developers cram in whatever is the most profitable for them.

Thank you,
Kristin Harrison

Tricia Keane

[REDACTED]
Pasadena, CA 91104

August 10, 2021

City of Pasadena

Planning & Community Development Department
175 North Garfield Avenue
Pasadena, CA 91101

RE: The Affinity Project Planned Development #39 – Providing Housing for Seniors

Dear Honorable Planning Commission:

I am a 19-year resident of Pasadena and writing in support of the Affinity project, City of Pasadena Planned Development Project #39. The Affinity mixed-use development project addresses two critical needs faced by our City. First is the on-going need for more housing for seniors, and a related need is for additional medical office space for Pasadena's growing medical and technology industry.

As you may know, Pasadena has among the highest concentrations in the Los Angeles region of residents aged 50 and older. Given that the Independent Living vacancy rate in 2019 was 0.5% for Pasadena, there is a real need for additional housing options for our seniors. The Affinity will provide a much-needed option for housing for people who want to remain in the community as they age and their housing needs change.

The project is the right type in the right place. In addition to locating housing for seniors near transit, the project also includes additional medical office space near Huntington Hospital and in the area of Pasadena where such uses are appropriately located.

This is a well-planned project that is appropriate for and consistent with the Arroyo Parkway corridor, and I respectfully encourage your support.

Sincerely,



Tricia Keane

Varsh, Tess

From: Dean Kitchens [REDACTED]
Sent: Tuesday, August 10, 2021 11:12 AM
To: Varsh, Tess
Cc: Reyes, David
Subject: Affinity Project Pasadena

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Dear Ms. Varsh:

I am writing to express my support for the Affinity Project on Arroyo Parkway in Pasadena. It is a lovely and much-needed development for the area, with goals and uses consistent with the neighborhood and the demographics of the City of Pasadena. I understand it will soon come before the planning commission and I therefore wanted to register my strong approval of the project.

I am a long-term resident of Pasadena, and have been active in the life of the City, including my ongoing service as a director of the Oak Knoll Neighborhood Association (albeit my endorsement of this project is solely as an individual). I care greatly about development in Pasadena, and urge approval of outstanding projects such as this one which will add to the beauty of Pasadena and will provide much needed health-related resources to the community.

Thank you for considering my views regarding approval of the Affinity Project.

Sincerely,

Dean Kitchens

[REDACTED]
Pasadena CA. 91106

[REDACTED]

From: [stan kong](#)
To: [Varsh, Tess](#)
Subject: Affinity Development Project
Date: Wednesday, August 11, 2021 4:40:31 PM

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The Affinity Development appears to be a good project for the Pasadena Community having viewed the pedestrian video on YouTube and a conversation with Pete Kutzer. It will revitalize the area and improve the experience entering Pasadena through the Arroyo Parkway corridor.

Sincerely,
Stan Kong



August 11, 2021

City of Pasadena

Planning & Community Development Department

175 North Garfield Avenue

Pasadena, CA 91101

RE: PD#39 - Affinity Project – 465-577 S. Arroyo Parkway

Planning Commissioners:

The proposed Affinity development planned on Arroyo Parkway is a project I can support. As a member of Pasadena's healthcare industry, I am pleased to see such a great investment in our community's growing medical industry.

I've had my physical therapy practice in Pasadena for 15 years. This project will address the need for more **Class A medical office space in the Huntington Hospital Corridor and will enhance Pasadena's ability to serve the medical technology industry, while contributing to the economic interests of the city.**

Working with many seniors, I can appreciate how beneficial it will be to have medical office space close to senior housing. This project will be a great asset for our residents and an economic boost for our city.

Regards,

Erik Landswick

Landswick Physical Therapy • [REDACTED]

[REDACTED]

Varsh, Tess

From: Nikki Macie [REDACTED]
Sent: Wednesday, August 11, 2021 12:08 PM
To: Varsh, Tess
Subject: The Affinity Project

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Dear Pasadena Planning Commission:

I want to express my support for The Affinity project, the proposed mixed-use development on Arroyo Parkway. Since I have an older parent, the idea of a new housing project for seniors is very appealing to me.

We hear a lot about the need for more housing, but housing for seniors is not always a priority. This project will provide both assisted and independent housing, which is great for people like my mother, who want to stay in the area. The fact that the facility is near public transit is another plus. So many seniors have to give up driving. To have the ability to use the Metro or take a bus will not only be convenient, it will help residents feel more independent, not having to rely on friends or family for transportation.

I understand that the development also includes a medical office facility. That makes perfect sense near senior housing. Currently I drive my mom to many different doctor and health-care related appointments all over Pasadena. Having a Class A medical facility so close will be great for those senior residents. It will be a great addition to Pasadena and should help attract quality medical providers.

Sincerely,
Nikki Maciejowski
Woodbury
Altadena, CA 91011

Varsh, Tess

From: Penny Plotkin [REDACTED]
Sent: Wednesday, August 11, 2021 9:04 AM
To: Varsh, Tess
Cc: Reyes, David; Pete Kutzer
Subject: Affinity Project on Arroyo Parkway

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Good Morning Planning Commission,

Last month was the first time I had seen plans for the Affinity Project during a presentation to the Pasadena Heritage Board.

I was so impressed with the presentation and the outstanding complex that is being developed there. What a great, positive, and much needed addition to Arroyo Parkway.

Best Regards,

Mrs. James R. Plotkin

Varsh, Tess

From: Julie Rosenberg [REDACTED]
Sent: Tuesday, August 10, 2021 5:25 PM
To: Varsh, Tess
Cc: info@affinitypasadena.com
Subject: Affinity Letter JR.docx
Attachments: Affinity Letter JR.docx

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To Whom It May Concern,

I think this is a worthwhile project and I fully support it.

Julie Rosenberg

[REDACTED]
South Pasadena, Ca 91030

Sent from my iPhone

Name
Address
Address

August 10, 2021

City of Pasadena
Planning & Community Development Department
175 North Garfield Avenue
Pasadena, CA 91101

Subject: The Affinity Project - 465-577 S. Arroyo Parkway in Pasadena

Dear City Planners/Planning Staff,

I'm writing to support the mixed-use project called The Affinity. This property consists of a full city block and when completed, I believe it will greatly enhance the Arroyo Parkway corridor and contribute positively to the lives of area residents.

Plans for the development include two key components -- new medical office space and assisted and independent housing options for seniors. It goes without saying that housing is in high demand, and seniors do not have a lot of options for housing if they want to remain in the Pasadena and South Pasadena areas. We have high concentrations of residents aged 50 and older, so a project that addresses the needs of our seniors will be a welcomed resource in the community.

People also want to have the care they need as they age. This project would allow continuing care for both independent living and longer-term needs including assisted and memory care. Building a modern medical facility close to those people with increasing health-related needs is a good fit. The medical resource will serve residents and the greater community as well. But perhaps equally importantly, it will support the area's growing health and wellness industry and help to attract top medical professionals to the city.

I hope you will approve this project that will add so much to the area.

Best regards,

Julie Rosenberg

Michelle Round
[REDACTED]
So. Pasadena 91030

August 10, 2021

City of Pasadena
Planning & Community Development Department
175 North Garfield Avenue
Pasadena, CA 91101

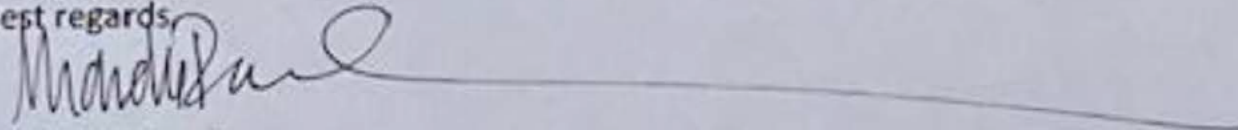
RE: PD#39 - Affinity Project – 465-577 S. Arroyo Parkway

Planning Commissioners:

Frequently the need for more housing is in the news. However, we don't often hear about the need for new housing for seniors. The Affinity Project is a mixed-use development that will provide both assisted and independent housing options for seniors. The project will also include much needed medical office space in the growing medical and technology corridor near Huntington Memorial Hospital.

I think this project will be a welcome addition to the area that will provide health and wellness services to residents and the greater community as well. I hope to see the project move forward in a timely manner so we can see the positive economic benefits this plan will bring to our town.

Best regards,



Michelle Round

Varsh, Tess

From: Tamara Silver [REDACTED]
Sent: Wednesday, August 11, 2021 3:58 PM
To: Varsh, Tess
Subject: Planning Commission Meeting of 8/11/21

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Hello,

Following is my comment for tonight's Planning Commission Meeting...

Re: 491-577 Arroyo Parkway

Dear Commissioners,

I write to encourage you to maintain or increase setbacks for this development and to require in-ground trees planted and maintained along all streets that border this development.

Although other buildings along Arroyo Parkway do come up to the sidewalk with no set-back, because something was done in the past does not mean we cannot change based on our needs today. Set-backs and plantings make sense and they make dollars and cents. Set-backs with green space and in-ground trees will help to cool the streetscape, encouraging walking. Nobody wants to walk along a street with heat radiating from buildings and roadway. Plants and trees will mitigate the reflective heat from the asphalt roadway, concrete sidewalk and glass and stone of the building itself. Trees will shade and help cool the building, reducing costs for air conditioning. In addition, trees sequester carbon. As responsible stewards of our city, the addition of in-ground trees should be required of this and all developments in Pasadena as one thing we can do the combat global warming.

In addition, please consider robust requirements for use of Metro and other non-car means of transportation to reduce traffic impacts. Please do everything possible to move trips out of cars and into public transit and bicycles.

I understand these items will add to the up-front costs of the development but believe they will keep this a highly sought-after development which will allow in turn the owners to compete with new buildings as they come online and to charge premium rents for years to come.

Thank you for your consideration,

Tammy Silver
President, Oak Knoll Neighborhood Association
Title for identification purposes only.

Varsh, Tess

From: Stevens Susan [REDACTED]
Sent: Wednesday, August 11, 2021 12:38 PM
To: Varsh, Tess
Subject: 491-577 S. Arroyo Parkway

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I would like to express my concern about the planned development at 491-577 Arroyo Parkway encompassing a large medical office building and an assisted living complex.

This intersection is already overburdened with traffic, particularly at rush hour. This complex would contribute to the excessive amount of traffic and noise in an already congested area. Pedestrian and bicyclist safety should also be a consideration.

The massive size of the buildings with minimal setbacks and little green space creates an aesthetically unappealing corridor that is incompatible with neighboring landmark districts.

The City of Pasadena is currently proposing a 15% reduction in water usage due to drought conditions. How does this massive project fit within the scope of this reduction? It is disturbing that projects are being considered for approval that dramatically increase our water usage.

I strongly urge you to consider how the added traffic, water shortage, looming buildings on historical areas, noise and lack of greenery all contribute to a less healthy city for our future.

Thank you for your consideration of this important issue.

Susan Stevens

Victoria Stratman

August 4, 2021

City of Pasadena Planning Commission
Hale Building
175 N. Garfield Ave., 2nd Floor
Pasadena, CA 91101

Dear Members of the Planning Commission:

I write to express my support for the proposed Affinity Project on Arroyo Parkway. I have had the opportunity to see the plans for this project and am truly excited about it. Having recently retired from the California Institute of Technology as General Counsel, I am very interested in remaining connected to Pasadena. The proposed Affinity Project would provide some much-needed senior living in one of the most vibrant parts of Pasadena. Rather than being cut off and isolated, the Affinity project will allow seniors to continue being an active part of the community with a variety of opportunities within walking distance, including access to two Gold Line stations.

Equally important to me, the project preserves the nature of that very special area on the Arroyo Parkway. The plan includes restoring two historic buildings on the site and creating a public courtyard in addition to a mixed-use facility with medical offices. Based on what I have seen of the proposal, the result will be a beautiful, pedestrian friendly addition to Pasadena while at the same time serving seniors, such as myself, with a chance to remain active in the community.

For these reasons, I hope that the Planning Commission favorably reviews this project and thank you for your consideration of my input.

Sincerely yours,

Victoria D. Stratman

Victoria D. Stratman

Varsh, Tess

From: Steven Trytten
Sent: Tuesday, August 10, 2021 9:16 AM
To: Varsh, Tess
Cc: Reyes, David
Subject: Affinity Project on Arroyo Parkway

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Dear Ms. Varsh,

I recently learned about the Affinity Project on Arroyo Parkway. After reviewing some of the available materials on line, I am very impressed with this project. It provides a lot of benefits to the City and looks very thoughtful in anticipating needs for additional parking and other considerations to make it a positive addition to the City. I'm also impressed with the high quality people who are involved in the project. Thank you for considering my comment, and for all you do for the City.

Best wishes,

Steve

Steven E. Trytten | Managing Partner, LA County

Henderson Caverly Pum & Trytten LLP

(t) | (f) |

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Varsh, Tess

From: Carole Walker [REDACTED]
Sent: Wednesday, August 11, 2021 10:34 AM
To: Varsh, Tess; Reyes, David
Cc: [REDACTED]
Subject: The Affinity Project

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Good Morning Tess and David,

I have been a commercial broker in Pasadena for over 50 years. I have seen Pasadena grow into a City where large corporations want their headquarters and smaller businesses thrive due to a population that supports it's businesses.

I have had the opportunity to study "The Affinity" proposed development project. For the last 10 years, I had envisioned a developer designing and building a project of this nature.

Once this project is built it will no doubt be a model for like projects across the United States. People interested in the assisted living business are looking for a more workable model to serve senior citizens.

How will this project advance the image of assisted living homes?

1. Creates a vibrant meeting place for friends and relatives in an atmosphere enjoyable to both.
2. In their normal everyday life they once had, they once again will be able to engage with all age groups. Shopping at their favorite stores, eating at a variety of restaurants, close to medical offices and Huntington Hospital.
3. The best part of all that this project offers is that friends and relatives would want to visit the seniors more often. It is a far cry visiting seniors in a sterile assisted living home where there is a small bedroom, a small recreation room and a cafeteria that serves bland unappetizing food. It will give seniors a new lease on life and living the last years in a more enjoyable atmosphere.

These developers are true humanitarians and will give Pasadena an image no other City will have. I foresee that this facility will have a waiting list to get in.

Please approve this development as I see this type of project as a future model for other assisted living homes.

Call me with any specified questions.

Sincerely,

Carole Walker | Executive Vice President
Redstone Commercial Real Estate

Email: [REDACTED]

Lic #: 01525534

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From: [Xiaoyan Zhou](#)
To: [Van Patten, Jason](#)
Subject: The Pasadena Affinity Project on Arroyo Pkwy
Date: Monday, August 16, 2021 9:09:55 PM

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Dear Mr. Patten,

It was nice talking to you this afternoon. I am writing this email to express my concern about the environmental effect of the Affinity Project.

1. This project's region centered at the cross of California and Arroyo Pkwy is already very crowded and busy. Bringing in more population and business will only make the situation even worse, such as more traffic, more noise, and more air pollution.
2. The project requests more resource consumption, such as water and electricity supply. By adding ~300 living units plus ground-floor commercial units and medical offices, do we know how much water is needed in the coming decade(s)? Are we ready?

Have you heard that Oakley, Utah, has enacted a moratorium on new home construction due to water shortage? We are not there yet. But do we know where we are in terms of water availability?

Pasadena keeps adding multi-home/office buildings. It is good that the city is gaining more property tax income. While the city finance is getting better, our living environment is not. For example, it has been years there is water trickling down along S. Euclid Ave in between Del Mar and California. Rotted leaves smell stinky (because there is no street sweeper). The neighborhood called the city numerous times; the problem is still not solved. We have not seen a street sweeper along S. Marengo Ave for years. Leaves, tree drops, and trashes stay at the separation along the road center (see the photo below) until a strong windy day. Every year the Pasadena police department asks for donations with more and more amount. This list can go on and on. The speedy enhancement of population and resource-consuming have cast a long-term negative impact on the Pasadena living condition and environment.

With best regards,
Shiaoyan

