

May 24, 2022

Chairman Rao and Design Commission Members,

My name is Sam Hooker and I am a resident of the iconic historic landmark Castle Green. I am in support of a well-planned and considered development at 86 S. Fair Oaks, but for such a significant historic site at the gateway to Old Town, SCEA is not an appropriate approval process without further environmental review from Design Review.

In this May 24<sup>th</sup> meeting, City staff is recommending an affirmation from the Design Commission that the SCEA is the environmental review document for the project, and “**THAT THERE ARE NO CHANGED CIRCUMSTANCES OR NEW INFORMATION WHICH WOULD REQUIRE FURTHER REVIEW**”. At both your last meeting on this project and the City Council meeting approving the SCEA as a review document, several Design Commissioners and City Council members expressed deep concern over many of the aspects of the environmental review. These concerns cannot be addressed if the Design Commission approves the SCEA as the only environmental document without further review. City Staff acknowledged that your concerns may not be able to be addressed in the SCEA document and during the last Design Review meeting said you could “add conditions of approval” to the project. The staff planner even said, “if you believe based on your analysis or review of the document...there are inadequacies in the environmental documentation that you think needs to be addressed or that city council should consider, it would be important for you to provide”. That is why it is imperative that the Design Commission take a step back and consider more environmental review information including alternatives.

The last time the Design Commission reviewed this process was in 2017 **BEFORE SCEA WAS BEING UTILIZED IN CALIFORNIA WITHOUT JUDICIAL REVIEW**. 7 of the 9 current Design Commissioners were not on the Commission at that time. If you doubt that there is limited input from the current Design Commission on the project, please review the transcript from the February 22, 2022 advisory review meeting. It is clear; many of the commissioners have concerns with the project.

The fact is, going back to environmental review as early as 2014 and through 2017, Design Review Commissioners have always had issues with this overall design, massing, impacts on traffic and historical resources.

The analysis of historical impacts are the opinions of one person, who is paid by the developer. There are several other historical experts that have differing opinions that are not included in the SCEA review other than as oppositional. Impact on historic resources is opinion. In other words, there are experts on both sides of the main historical resource discussions; The Department of Interior Standards for developments on/near historical landmarks particularly "spatial relationships" and compatibility with historic materials, features, size, scale, proportion and massing to protect the integrity of the then historic property and its environment. Even the responses to the comments from opponents of the project say that the report "addresses potential aesthetic impacts, including views and aesthetic character impacts. Of course, aesthetic impacts are merely opinion based and an advocate of the project writes the report so when they say those impacts are not significant, that is just an opinion. Prior Design Commissioners Byram, Barar, Moreno, and Hansen all questioned that statement and the response from the report even says, "The issue of assessing visual impacts is subjective in nature". All of those Commissioners expressed concern about the impact of the then 64-unit project on historic resource, compatibility, and views. In the final comments to the original EIR, Commissioner Rawlings said "The spatial compatibility of size and mass, in general, suggests having more alternatives". Commissioner Byram also asked to study alternatives. The fact that the current environmental review includes an opinion that the west side of the Castle Green facades is not historically important is enough for the Design Commission to have considerable concerns about the SCEA process and a lack of alternatives.

More recently, City Council approved a motion to refer the approval of the SCEA to Design Commission for an "advisory opinion". The Commission took up the issue on February 22<sup>nd</sup>. At several points in the meeting, staff told the commissioners they would have input on traffic and historic resource issues at final design review. There is no legal

requirement for Design Review to approve any proposed project that is not fully vetted including those impacts. SCEA is merely an environmental review document, not a project approval.

The current and recent Design Commissions have never had meaningful input into this project. Previous, less dense projects have been explored on this site for many years and previous Design Commissions have always been the lead agency and have never approved a project. So now, planning staff has determined a path for approval that specifically excludes that the Design Commission from the process by using a state permitted – not mandated, process called SCEA for transit oriented developments rather than a well-thought through EIR process that includes alternative outcomes that would ensure better planning for this iconic site.

One final point, as a constituency, opponents of the currently proposed project have had little to no voice in this process. The project's developer has reached out to and met with many other constituencies, but has not asked to meet with anyone related to the most impacted group, the Castle Green. Those that are trying to protect the historical significance of the Castle Green should have more of a voice than a three-minute sound bite. No one is opposing a well thought out development.

Thank you for your consideration. I hope that you will not expedite a process that has such a major impact on the City of Pasadena and its residents.