

Mike Salazar, Architect for the **Castle Green Homeowners Association**
Opposition to 86 S. Fair Oaks Avenue Concept Design Review – May 24, 2022

May 23, 2022 – Final

Dear Design Commissioners:

At your advisory review, the Design Commission didn't advise the City Council that the SCEA was the right and best document, but that the documentation in SCEA met the 3 simple TPP transportation Priority project requirements and "checked all the boxes" of adequacy. Now staff is asking that you "affirm the application of SCEA process" as the correct path. We hope you'll agree that on this most historic National Register site, block, and District that the SCEA application is not the right and best environmental review.

Now that appears to be *your* call and only yours.

As the **Staff Recommendation** states in the public notice Agenda:

"Staff Recommendation:

1. Affirm that the application for Concept Design Review was subject to environmental review in the Sustainable Communities Environmental Assessment approved by the City Council for the same project on April 11, 2022, and that there are no changed circumstances or new information which would require further environmental review.

2. Approve the application for Concept Design Review subject to conditions to be further reviewed during Final Design Review."

The Design Commission's actions for the last 14 years of projects on this site has been first and foremost what is right and best for this site, for the historic block it is on, and for the historic district that this block anchors. What has been right and best has been to not approve this project *at every review* since its bloated beginning in 2008:

- a. The Applicant's 2011 illustrated option of Scheme C as Colonel Green's 1903 Concept (that the current projects at best distorts and exploits).
- b. The inadequate 2013 EIS (which is "equivalent to a SCEA review" according to staff).
- c. The Draft EIR and its traffic impact undercount.
- d. The Revised Draft EIR with its significant and unavoidable traffic impact.
- e. The failed 2015 Final EIR, *which was not certified as accurate or complete*.

All of this for a significantly smaller project of 64 units, not 75 feet tall (but still impactful at this height), less lot coverage with factually less impacts than this SCEA project. That 2015 EIR project had significantly more actionable environmental categories than the mere 20 reviewed and actionable in SCEA.

What is right and best is not a diminished SCEA review with only three qualifying criteria – all transit related - and required "goals and strategies" in which not ONE of them takes cultural, aesthetic or historic preservation under consideration, and never mentioning any review standards other than transit due to its proximity near Metro transit stations (and nothing to do with Old Pasadena).

In fact, staff made the CHOICE to use SCEA, despite their first-hand knowledge of the broad failures of the smaller 2015 uncertified EIR project and the almost unparalleled historic significance of its location in historic Old Pasadena. Staff was not forthcoming with the City Council, telling them over and over again that it was essentially their only option to adopt SCEA. Certainly SCEA makes staff's job so much easier. But it will make the Design Commission's work that much tougher if not impossible to make this the best project this location deserves.

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We get staff's frustration with *another* Revised EIR for this latest version project (same project goals, criteria and basic scope). It comes with *heightened* unresolved controversies, aesthetic, alternatives and traffic concerns, but conveniently SCEA wipes all those and other concerns (such as any cumulative impacts) away. However, we are just as frustrated with this Applicant's continual push forward without getting the true significance of this most historic site and district.

So perhaps staff thought with the clear failure of the smaller project and now this bigger one, the diminished SCEA review was a slam dunk. So far, so good, it seems.

In fact, the DC's near-unanimous *advisory vote* at the City Council's request did nothing to address the myriad lingering reservations many have for this project and seemed to truly concern commissioners that the reduced environmental scope of SCEA would hamper necessary design changes to this project that have *always been within the commissions right and charge* so that this project does not take over this most sensitive preservation site, block and district at the expense of historic preservation standards.

Which brings us back to SCEA simply not being the RIGHT environmental document for this sensitive parcel. Yes, it's got the minimum amount of housing and yes, it's got right percentage of housing and yes, its location is tops. Yet as a transportation tool, SCEA doesn't do anything to reduce the known and significant impacts on Dayton Street, nor for the two adjacent unsignalized intersections on Dayton.

In 2014, the city stated that Dayton Street will be overwhelmed by the smaller 2015 project's daily vehicle trips and had to issue a Revised DEIR. So, while that metric got tossed in time for 2017's "new" project, staff knows that the SCEA project will make Dayton Street much worse and those unsignalized intersection could become outright un navigable if not safety hazards.

In this project's Conditions of Approval (Attachment A, Page 3), Condition #22 further acknowledges traffic failures beyond the 2014 impacts – that this larger project well exceeds the City's established ADT Cap along Dayton Street between Fair Oaks and Raymond Avenues. But sticking with SCEA evidently relegates this known major impact to a mere "condition for approval" to wipe away this significant and unmitigated impact with a mere *ten* (10) discounted Metro passes and letting new residents *voluntarily* opt out of (unbundle) parking. Viola! 839 project trips magically rectified (unless you happen to drive on Dayton at rush hour, like the AM/PM peak fire department emergency route).

STAFF REPORT

Analysis

As for the actual Staff Report, there are many points of contention that the Design Commission must grasp. As noted initially, staff is directing the Commission to "affirm" this lacking SCEA process. That puts the burden back onto your shoulders to figuratively approve SCEA even though it's not the best and right process for this most historic location. Adequate and 'checking the boxes' is not the Design Commission's standard of review. **We highly doubt that if given the choice, the Design Commission would opt out of EIR considerations of Alternatives, full Aesthetic impacts, consideration of cumulative project impacts, broad traffic impact reviews and the "Areas of Known Controversy" pointed out and unresolved with the smaller EIR project that likely are now bigger controversies and/or impacts.**

But let me point out a significant and frankly troublesome problem with the "Analysis" section (Pages 4-11) – somewhat of a deception by staff – in that critical Commissioner comments only from one meeting 5 years ago are noted as relevant and satisfactorily addressed by the Applicant, back in 2017 when the assumption was another full EIR process (SCEA was under sustained legal challenges and a SCEA consideration was stated in passing without explanation or elaboration). In the 2018 review, as in 2017 there was no additional SCEA information provided.

In fact, Commissioners (and the public) have since that initial 2017 first review of this larger 87-unit project, had additional review meetings with many many more pointed as well as broad-based questions, comments and concerns, none of which dates and comments appear in this Staff Report and therefore remain unaddressed by the Applicant. We know what these comments are, because previous and current Castle Green HOA letters submitted have quoted the transcripts of these ‘unacknowledged’ review meetings and critical comments.

Is this an error - possibly, but that means dozens of comments about this specific project (2018, 2021 & 2022 previous reviews) are all left off the Staff Report. This gives the impression that the Commission - of which there are many new members – had only 13 comments in 5 years for this project, back when it was a flat 75-foot-tall project. It wasn’t until 2021 that the project grew in height and impacts and Commissioners comments and questions grew quite lengthy and detailed.

All Commission Comments, not just from this early Preliminary Consultation *5 years ago* are absolutely germane and equally if not more critically important, yet staff chose to omit all comments from at least three subsequent reviews since 2017. And why didn’t staff list City Council concerns expressed in 2018 or 2022? This is shameful and continues what might be characterized as a pattern of half-truths and misdirection by staff to the Design Commission and to the City Council to further SCEA as an “only option” and therefore diminish project concerns and opposition.

To take this Staff Report at face value is to therefore conclude that all subsequent Design Commission questions, comments and concerns have NOT been addressed satisfactorily. This raises the real possibility that this Staff Report may be invalid, and could possibly invalidate this entire hearing as well.

Findings for the Approval of Height Limit Exception through Height Averaging.

Height limits of 75 have been questioned in past versions of this project, and how they affect the historic Hotel Green block and structures and the surrounding Old Pasadena district. While this height of 75 feet is ‘allowed’ by zoning, it has impacts on the existing Hotel Green structures, its neighbors and the district.

75 feet in and of itself goes against the very nature of Old Pasadena as an essentially low-rise district. Look at every contemporary development in Old Pasadena, many of which are adjacent to the national Register block.

Every single contemporary building in this vicinity since (and including) the adjacent Schoolhouse parking structure (and two other recent parking structures) have been limited to 40 feet or less. Period. In every single hearing - I know because I personally participated in their review and approvals (either individually, as a commissioner or on behalf of the Castle Green), as have the Design Commission. New building heights are always of concern to protect *and respect* the very character of this low-rise district we’ve all fought to preserve. In fact, some of these projects were actually *reduced* in height below 40 feet from their proposals.

Now SCEA wants you to approve “Height Averaging,” not satisfied with the impactful 75-foot heights that raised concerns in the smaller 2015 EIR project. “Fuzzy math” is what some call it, but it’s more like smoke and mirrors when this project boasts an average height of “69 feet,” yet dominant components of three of four elevations exceed 75 feet. Let’s be clear: without “Height Averaging,” this project exceeds zoning’s height limit exceptions, although this is the first staff report to clearly state this.

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“Height Averaging” also at best misleads the general public, often becoming abbreviated as the ‘average height’ of a project. Wow, only 69 feet, less than the 2015 project... Wrong! Just like calling this a 6-story + mezzanine, when the dominant 90 tower is 7 stories, and the project contains *two* mezzanine floors.

Using common math to average what the public and nearby impacted residents will actually experience, every elevation (except the somewhat hidden north side) features prominent heights of 84 to 90 feet. In fact, if you do the math, the “average height” of the Fair Oaks/West Elevation is 81 feet – well above the height averaging of 69 feet. And 50% of the Fair Oaks height averages about 87 feet, as it has a top-heavy 84-foot-tall bay-window-like mid-elevation protrusion and a massive southwest corner tower with 0-2’ setbacks at 90 feet tall. Both eclipse all existing residential unit windows at both Castle Green and Green Hotel Apartments (except at the Castle Green’s rooftop penthouse rental unit).

Heights impact many things, and clearly what this does is contradict the low-rise nature of the district, kills many historic and established view corridors, and opens the door for future projects in Old Pasadena to build taller and be more impactful. Transit over Preservation. The project’s excessive heights may not ‘delist’ the block’s historic status, but ‘delist’ is a diversion from its negatively impacts to the very nature of the parcel as the project now competes with, as well as blocks out the original historic Hotel Green buildings, contradicting the Secretary of Interior Standards for appropriateness and subordination for this site.

The staff report on page 2 discusses height averaging, and asks for two findings: #1 as an acknowledgement that the ‘fuzzy math’ is correct, and #2 with subsections that stretch the incredulity of height averaging and staff’s biased imagination:

“2a. Height Averaging provides a more sensitive transition to the adjacent historic structure (sic) and provides for more interesting skyline.”

Seriously – to create a skyline for Old Pasadena? That is historically what the original Hotel Green buildings have provided for 120 years – this building should not compete with these historic structures, nor should it all but eliminate their existing profiles from the entire western Old Pasadena’s thousands of residents. And nor should they block the long-established western views *from* the existing buildings on the block.

As for a sensitive transition, there is none at the north elevation, and the east elevation is so overwrought with skinny towers and numerous stepped heights that it dominates what should be a landscaped interior courtyard and flat out competes with long-established and well-earned primary façade status that the Design Commission previously stated these interior-facing existing Hotel Green façade deserve.

“2b. The additional height will not be injurious to adjacent properties or uses, or detrimental to environmental quality, quality of life, or the health, safety, and welfare of the public.”

The additional height – when no city body has accepted the 75-foot heights for this parcel of the previous project – will further block sun, light and air flow, and unnecessarily further diminish the historic views to and from the Castle Green and Green Hotel Apartments. These existing historic buildings will certainly have to use more energy to turn the lights on earlier and leave them on longer, to run fans or AC units because the air flow has greatly diminished or drive somewhere else at sunset because their long-established historic views are gone.

“2c. The additional height will promote a superior design solution that enhances the property and its surroundings, without detrimental impacts on views and sight lines;”

These 84-, 88- and 90-foot-tall height exceptions is not a “superior design solution,” as noted in additional conditions of approval. Nor have been any of the previous 75-foot-tall versions of the project. In fact, we believe a “superior project” will only be found by analyzing CEQA-qualifying Alternatives in a Revised or new EIR process.

The 90-foot tall, massive tower element at Fair Oaks and Dayton is rebuffed by staff for major design flaws (Condition #3, Attachment A), yet contradictorily cited in Finding 2c as “superior”? This same tower element is poorly copied from the existing Green Hotel Apartments at the intersection of the historic buildings, and the awkwardly tall and skinny 7-story stair towers (84-88’ and prominent at the east façade) mimic the former original 1894 Hotel Green (although this never exceeded 5 stories). And along the west elevation, offset from the midpoint is a sky-high 84-foot-tall explosion upwards of bay windows with a top-heavy 7th floor glass-and-steel-looking feature poorly referencing the lower floors repetitive bay windows of the former 1880s Throop building.

But clearly these tall elements only take further block views and sight lines, adding to the impacts of the 75 foot base height with no Dayton Street setback.

“2d. The additional height is consistent with the objectives and policies of the Central District Specific Plan and the General Plan.”

Flat out, there is no call for tall buildings in Old Pasadena, which is why it has historically been a low-rise district, which is why all contemporary development surrounding this most-historic block have been limited to 40-foot heights or less.

Additionally, this development fails to do what the General Plan and Central District/Old Pasadena Specific Plans call for: to respect the long-established development patterns critical to Old Pasadena and the city in general. Clearly this project does NOT meet these established criteria.

Clearly, height averaging is masterfully manipulated for this project, adding excessively tall tower elements that the Staff Report falsely claims in 2b above, and on Page 13 of the Staff Report *doubles down again* on the fallacy that excessive height elements somehow “preserve” vistas, views corridors, sensitive transitions “and/or” a skyline in this historic, low-rise district.

Findings for Concept Design Approval

Following the Height Averaging findings, the Staff Report lists two findings for Concept Design Approval to be granted provided the Commission agrees with the Height Averaging findings questioned above, and that the project also meets the Secretary of Interior Standards.

We’ve all read the Historic Resources report, that by the way claims this project is the second coming of Colonel Green’s 1903 Concept – it is not – and that it meets all relevant historic criteria of the SOIS. The HR is also strangely similar to the failed 2015 EIR’s HR report, yet the project is far taller, substantially larger and still of questionably aggregated and borrowed design elements without a real cohesive or complementary design. Yes, it’s better than the 2015’s project, but it’s like saying tennis shoes are better than sandals in the snow.

As for the intent and claims this project resembles the **1903 Concept** as justification of the 7 story 75-to-90-foot-tall building, here’s where this just isn’t true:

1903: Integral, connected third wing of the Hotel Green to form a singular, U-shaped hotel focused inward on a lushly landscaped open space.

2022: An independent, stand-alone unconnected building, with a much wider floor plate and lot coverage that takes about 75% of the parcel for development and provides effectively no more open space than exists today, despite adding 87 new units and the 1903 landscaped open space courtyard. The Staff Report then wrongly states on Page 11, “The originally submitted design for Preliminary Consultation proposed a U-shaped plan sited mostly at the southwest side of the site...” without follow-up. This is just false. The SCEA claims that this stand-alone building “Completes the historic block.” This too is false.

1903: A six story connected wing approximately duplicating the Castle Green’s Dayton Street setbacks of 33-34 feet at the upper floors 3-6, and 17 feet at 1st & 2nd floors to respect Dayton Street and Central Park.

Fair Oaks façade upper floors 2-6 had between 8–16-foot (or more) setbacks above the ground floor plinth and a prominent two-story entry.

2022: A stand-alone 7-story 90-foot-tall tower of poor design with barely any setback (0-2 feet), completely disrespecting the Castle Green, unnecessarily blocking all western views to and from the block. The Fair Oaks façade is essentially at the street with an average 81-foot height, and elements covering 50% of the façade that are 84 & 90 feet tall.

1903: The design of this connected wing appears to also emphasize the horizontality of the two existing wings, and masses design elements to avoid a vertical emphasis.

2022: The project fails to have any horizontality to it. In fact, the Fair Oaks façade consists of four vertical elements in an A-B-A-C pattern unseen anywhere in Old Pasadena.

1903: The third connected wing created a superblock singular element.

2022: The project creates the tallest development within blocks of the historic site, contrary to the established low-rise historic district. In fact, nowhere in Old Pasadena is there a contemporary building (since early 1920s) that exceeds 40 feet, except on Colorado Boulevard.

There has not even been a discussion about the appropriateness of Colonel Green's 1903 Concept, partly because no Alternative was proposed (despite Applicant's 2011 Scheme C) in the failed 2015 EIR version, and now because SCEA's inadequate review for this site does not allow a consider of any possible or likely Alternative scenarios - only this dominating project. Colonel Green's 1903 Concept was a sensation, no doubt by the time the North Annex (existing Green Hotel Apartments) was opened in 1903, but after 1904, there has not been any mention found (by Applicant's admission) of this concept. We think it is unclear at best if using a long-forgotten concept without full environmental vetting is appropriate 120 years later, but **what is clear is that this stand-alone tower project is not what Colonel Green ever intended.**

Transit vs. Preservation and the Secretary of Interior Standards

SCEA has never been implemented on such a historic parcel, block and district. SCEA criteria are all and only about transit aspects of its location, yet the most important related criteria is actionable with an EIR. While SCEA may include a one-off version Historic Report not that different from the failed 2015 EIR, SCEA prevents findings made outside of the 20 environmental categories (far less than an EIR), and requires no cultural, aesthetic or preservation criteria or performance, which seems to conflict the very Secretary of Interior Standards that govern this parcel, block and district. The Staff Report mentions but 2 of 10 criteria that in staff's eyes the project meets. The HR finds no fault with any standards yet has contradictions about key points like the fact that the internal-facing facades of the existing Hotel Green buildings are treated as secondary but should be primary facades due to the test of time and best practices. These internal existing facades are clearly being overpowered by the overwrought and varied heights of the project's east façade (See Figure 2.0-35, SCEA)

What is telling about this is that the project fails to meet (or clouds at best) its criteria in several of the Secretary of Interior Standards. Meeting a couple of them does not negate the ones it does not meet:

- 1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment:**

Is the historic purpose of this property the connected third wing to make a singular U-shaped building, as the project claims it fulfills the 1903 Concept? With no Alternative of this actual plan, and the decades-long parks and recreational uses of this parcel, is *that* the proper use? SCEA can't resolve this. Doesn't a stand-alone tower create the MAXIMAL change to the site?

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided:

Does the 1903 Concept, defunct since 1904 'retain' the property's historic character? Did the unpermitted removal of historic walkways in the past 2-3 decades foster this development? Shouldn't a new 7-story tower, soon to be looming over the similar sized 'recreation area' be avoided?

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken:

Without Alternatives or a method to analyze, SCEA no opportunity to analyze the stand-alone 7 story tower pretending to be the 1903 Concept. Is the distant 1903 Concept – if only on paper – a valid physical record of its time? Doesn't this project "claiming" to be that concept create a false sense of history? Does the adding a copycat tower or stretched skinny stair towers of the original HG (See Height Averaging, 2c. above) create a false sense as well?

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence:

This perhaps only pertains to the one or two existing segments of original walkways remaining that were never identified as such by applicant or the historic record. Sadly, many of these walkways disappeared before or around the turn of this century.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment:

Differentiation is a complicated concept, evidently. With differentiation comes compatibility and subordination, neither of which fit this bold and brash, look-at-me (at the expense of the existing buildings) project. It strives to be the *new gateway* as a stand-alone, not as a partner with the historic Hotel Green, and certainly not as the missing element of the singular Hotel Green complex. We should refer to this historic block as the Rodney Dangerfield of Old Pasadena – It's got no respect from this project.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired:

Staff actual cites this #10 criteria in the staff report, stating, "if the new building were to be removed in the future, the context and environment of the historic resources would remain unimpaired, and they would still be able to convey their significance." Is the staff already thinking of its demolition? Yes, it meets this criteria for sure - an unintended silver lining? Or perhaps this harkens to another contemporary Pasadena building that deservedly got no respect, and that its partial-demolition healed a significant wound – the Arch & enclosure of the Plaza Pasadena in the Civic Center. Now if we could only apply this to the former Mutual Savings and Courthouse buildings in the Civic Center...

An Aside: HISTORIC VIEWS IMPACTS

View analyses for this and previous iterations of the site's proposals have manipulated viewpoint locations, and SCEA is no exception. SCEA reviews supposedly 7-8 'viewpoints to state that there's little view impact. But as noted since 2011, the entire Dayton Street west of Fair Oaks is a long-established view corridor. 120 years ago, this view corridor was established, all the way up to West Pasadena's Orange Grove Avenue.

When the 710 freeway was built, trees were planted along the freeway's east and west frontage roads that cut back the full length of this historic view corridor. But as it remains today, it has been cited over the decades as a great feature of Old Pasadena, and when the former east campus of Ambassador College was turning into the in-town residential neighborhood envisioned since the early 1980s, the city and residents cited over and over the amazing view to the Castle Green. From Pasadena Avenue east to Fair Oaks, this unacknowledged view corridor has held fast for 120 years.

But instead, the 2015 EIR picked a random point on the west side of the 710 freeway obscured by the 1970s trees to discount this view corridor, and SCEA *mapped* and rendered an all-too-close-to Fair Oaks spot on Dayton street. But upon review, the deceptively sexy rendering (4.1-3, B) is NOT from Dayton St., but from a different viewpoint showing a view of the Castle Green not meeting CEQA criteria and *not from Dayton Street* but from the back corner of a private parking lot *south of Dayton Street*, hiding the fact that this 7 story southwest tower *completely blocked out the historic Dayton Street view corridor*.

Then SCEA wrongly mapped another a viewpoint a ways south on Fair Oaks Avenue, again supplying another sexy rendering (4.1-8, G) that is about 100 feet high birds-eye showing most of the Castle Green that again was deceptive and not meeting CEQA view criteria. And to further diminish the views lost by this 7-story tower, SCEA picked not one, but 5 "views" from Central Park, all with varying degrees of 'calculated' viewpoints to further the claim of minimal views lost.

Equally important but not considered (and allowed by CEQA) are the views long-established from the vast number of residential units in the historic HG buildings. More than half of the view angles are eliminated from most affected units due to the equivalent heights of the project when compared to the existing structures. Not that everyone's views must be forever maintained, this project eliminates all western views to and from the Castle Green and Green Hotel Apartments and many southward views from the GHA. This is why Alternatives are critical for this sensitive site. These important views from the historic buildings were ignored in SCEA. However, another deceptive sexy illustration of a view *from within the Green Hotel Apartments* (2.0-38) misleads the public in incorporating the historic landscaped Castle Green backyard into the much smaller SCEA project's rear yard, deceptively implying that the project is creating a large and green 'central courtyard' that the 1903 Concept calls for. The deception is that no existing fence, partition or even text clarifies that most of the green space is NOT of the project, but existing now at the Castle Green.

Staff has ignored these SCEA view deceptions and SCEA has maintained all of these misleading viewpoints from 2021 up to today. Views are important, and loss of these views – contrary to SCEA – are real impacts. We hope the Design Commission agrees.

ATTACHMENT A - 79 CONDITIONS OF APPROVAL

Surprisingly, only 5 of the 79 Conditions recommended by staff deal directly with project design, while almost double that number address trees. Most deal with public works and the surrounding sidewalks and roads, yet none require any roadway or intersection configuration improvements.

Conditions 1-5 deal with design and call for major redesign elements that would be better suited to study than as a Condition. Overall articulation and detailing (#1), the west façade and southwest corner tower

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“further enhanced and articulated (32), refinement and re-fenestration of the west façade and southwest corner & awnings (#3), massing along Dayton Street refined (#4) and stair tower studied to be better design (#5) are all majorly in need of redesign, but this is mute on the overall massing issues, height issues and impacts not even studied but that were called out on the previous iterations.

Further to make matters worse, staff mischaracterizes many Commission comments in the Staff Report and seems to have cherry picked the easier tasks and distorting others, such as #3 (Staff Report, Page 5) to claim the Design Commissioners wanted more height and height averaging so the southwest corner tower could be 90 feet – the maximum height limit allowed under height averaging. I bring this up under Conditions because staff’s distortions of Commissioner’s concerns relates directly to the oversimplified yet complex corrections called for in these #1-#5 Conditions.

Condition #22 was previously noted for its acknowledgement of a significant traffic impact, unquantified by SCEA, and instead of requiring physical, project-designed mitigation, added Metro passes and voluntary parking regs are suggested. This forces back the IDS/Playhouse fiasco when both the Design Commission and City Council (on appeal) approved this historic-site-adjacent project without adequate Alternative study and without incorporating a known traffic impacts from a singular crosswalk.

This city loss in court cost millions and years delay to do the EIR right, to include real Alternatives and to incorporate this little crosswalk that could into the project design. So fast forward to today (after the 2015 EIR failed in producing only 1 Alternative and no physical traffic mitigation measures other than a don’t block the driveway sign) and the no-Alternative SCEA with physical Dayton Street improvements and not even additional signage or crosswalks, let alone traffic signals at the likely affected Dayton intersections (not studied in 2015 or in SCEA since they don’t have signals), I would hope this gives the Design Commission pause to think hard about SCEA and this known traffic impact that will envelop Dayton Street.

And while Dayton Street is left to flail (or fail?) traffic-wise, it will get new (concrete?) paving (Condition #30), new LED streetlights (#34), new sidewalks and ADA ramps (again). In fact, there are almost as many sidewalk Conditions as design Conditions, yet no Condition to require the Fair Oaks sidewalks to be replaced using the existing historic sidewalk patterns.

Condition #34 requires Crape Myrtle trees to be planted along the Fair Oaks elevation at the sidewalks. The Castle Green was required to plant street trees in the lste-1990s, early 200s when restoring the Bridge. While the Castle Green objected to adding trees on the grounds that they were never there, the city required Crape Myrtle trees that ultimately caused damage to the historic 1898 sidewalks.

With the 79 staff-recommended “Conditions of Approval” and likely far more recommended by the Commission if the project moves forward, and no Alternatives allowed by SCEA for consideration of findings, making findings for Concept approval might prove better time spent on denial for an EIR process that’s within your right, or at least continuation in hopes that once again a redesign could be mediated to produce a good project.

The Castle Green HOA has worked on this process since its 2008 inception. We have met with the Applicants, its myriad architects and representatives. We’ve asked for considerations, but the project (since 2011’s reboot) has only become larger and more uncharacteristic of its important site.

The Castle Green ultimately supported the 7 story Del Mar project design, because that height for that site had little impact on a relocated (and roundly panned) train station and was well out of impact range of the historic Hotel Green block.

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We have said at virtually every turn of events for the Central Park Apartment's parcel that we accept progress and development on this historic parcel and worked constructively with the community to push for a project that is best that gives due respect to the Castle Green and Green Hotel Apartments and reduced burdens on adjacent residents and the district.

Sadly, we're met with a staff that insists on this diminished environmental review, is less than forthcoming with its review bodies and driving this process instead of letting the process create the best project. Old Pasadena deserves better, but just 'adequate' environmental review. The historic Hotel Green block deserves the absolute most protection and deference. Don't allow yet another Sacramento law – long in legal limbo – to diminish Pasadena's resolute commitment to preservation as a community priority.

This is a site that over the past one hundred and twenty years has been recognized with the highest and best protection and guidance. But SCEA's demotion of this parcel and our historic block to "transit-adjacency" over long-standing preservation priorities is a watershed moment for Old Pasadena and the Design Commission. Just as the late-1980's Design Commission stood up and stopped the imposition of a proposed internal mall at the now-open air One Colorado block (two Design Commissioners lost their seats over political retribution but it was the right and best action), this Commission must grasp the full impact of this towering outlier and the very changes it will likely bring to historic Old Pasadena.

Please do not affirm the SCEA process and do not approve (or at least continue with additional conditions) this Concept Design. We stand ready as always to work for a better environmental process and an appropriate and respectful project at this most-historic site.

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