

# Grassroots Community Group of Alhambra

A 501(c)(3) non-profit corporation

P.O. Box 1235, Alhambra, CA 91802

March 22, 2021

To: Honorable Mayor and Council Members  
City of Alhambra

Re: The Villages development project, 03/22/2021 Alhambra City Council Agenda Item #5:  
Continued Public Hearing

The Board of Directors of Grassroots Community Group of Alhambra (“GRA”) would like to thank Council Members Maza and Andrade-Stadler who met with the developer of the Villages project over a period of several weeks in an effort to ensure an approvable project that balances the needs of all stakeholders, including, importantly, the citizens of Alhambra, the City, and the developer.

Nonetheless, while we acknowledge the changes that resulted from the process above, we do not believe that the project, even in its newly proposed form, is suitable and deserving of approval by the City Council. We have both process and substantive concerns.

With regards to process, we are especially disappointed in the way this proposal (for it is nothing more than a proposal at present) has been presented as a “deal” between the developer and the two negotiating Council members. While we will let the two Council members speak for themselves, nothing in the proposal can represent a “deal” at this stage since it has not been vetted by the remaining Council members nor the public at large. In fact, negotiating a “deal” was not the charge given to the two council members. Yet, the staff report included in tonight’s meeting agenda misrepresents a mere proposal as somehow an agreement to be ratified. We ask that this misrepresentation of a current proposal as a “deal” be properly rectified before it causes even more public confusion than it already has.

As to substantive concerns, GRA has several.

First, the current proposal does not even attempt to meet the city’s new Inclusionary Housing Ordinance in spite of explicit direction by at least four if not all Council members when this matter was last heard by the City Council. As presented, the 75 moderate-income only rental units represent less than 10% of the total residential units to be built. The city’s IHO, which is now part of the municipal code, requires a minimum of 15% of such units, allocated at all income levels (moderate, low, and very low). This project must meet the spirit of these requirements, or it fails on both moral and essential grounds and makes a mockery of the City’s IHO and City Council’s commitment to affordable housing.

Second, while the VMT method of analyzing traffic has been adopted by the state of California for CEQA analysis, the EIR for this project has already been prepared and it clearly concludes that traffic

is an unmitigable adverse impact from the project at all sizes above 120 units. Thus, the new claim that no significant traffic impact could be identified when using VMT methodology is not only irrelevant (unless the EIR is modified to state the same as well, which it cannot), it is also not supported since no one has vetted the new, VMT analysis and assumptions used in that analysis.

Third, regarding site contamination, while we have noted the statements about limited additional mitigation and testing, we cannot evaluate the rationale for their inclusion nor their effectiveness at this stage. More details are required before reaching any conclusions that the proposal is adequate, especially given the confirmation by EPA that the Villages will sit atop: (i) a Superfund site which will not be cleaned up for decades into the future; and (ii) a site contaminated from prior historical industrial uses, which has been improperly “closed” by the Regional Water Quality Control Board, using outdated and inappropriate methods. Our concerns regarding contamination very much remain.

Fourth, we must acknowledge that the additional Community Benefit payment of \$1.5 million is wholly inadequate, given a project of this size, scope, and impact. It does not merit any serious consideration and is, frankly, insulting.

We will have more to say as we learn more details about this proposal. While GRA understands and acknowledges the benefits that will accrue to Alhambra, including the additional housing, as a result of this project – this housing, we reiterate has to be both affordable, safe, and minimize already intolerable traffic in the area. We believe that these seemingly contradictory goals can be realized with a bit of creativity and honest engagement by the developer and citizens, including Council members – which is still missing. We urge the developer to engage in this process in an honest and straight-forward manner, eschewing slick PR campaigns full of half-truths and outright mis-statements.

Given our concerns, and the still many unresolved issues, we urge the Council to reject this current proposal and go back to the negotiating table.

Board of Directors,  
Grassroots Community Group of Alhambra