

# ALHAMBRA GENERAL PLAN UPDATE

San Gabriel Valley  
Oversight Group

a non-profit, public benefit corporation

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## Alhambra's Roadmap to Year 2035

by Eric Sunada

On June 14, 2017 at the Alhambra library, the city of Alhambra held a public input forum for the preparation of the Environmental Impact Report associated with the city's General Plan update. The city chose to co-opt the meeting as a General Plan status update and released its key goals and concepts as well as a draft re-zoning map.

Confusion reigned the evening as the public expected more details and a concrete timeline for release of the draft General Plan. In the end, the city's forum failed because the intent was never clear as it straddled an EIR preparation input session and General Plan output session, providing only cursory coverage to both.

In response, an open letter to the City of Alhambra was submitted by me on June 21:

Dear Sirs/Mmes,

**The scope and content of the General Plan and its EIR must include the following:**

Effects the project will have on the upward mobility of residents

Most germane in this regard for Alhambra is the availability of affordable housing to assist the relatively large number of residents who are struggling and thus vulnerable. The city's abhorrent track-record over the period covered by the existing General Plan (1986 to present) must be considered as a contributing factor. That is, the discriminatory housing policies and practices executed by the city has resulted in over 92% of our affordable housing inventory being restricted to a sub-group that represents less than 13% of those in need. Meanwhile, families with children, which represent the largest lower income group within the city, are categorically denied access to this inventory because of age discrimination. Alhambra Unified is considered a low-income school district with over 60% of our high school students qualifying. What little inventory that does exist is threatened by covenants that will eventually expire without a concerted effort to renew them. Indeed,

the need for more affordable housing is the problem of our time. A General Plan and EIR that does not address this fact is a General Plan that is not credible. Note that previous practices by the city of simply adding market-rate housing are unacceptable. There is no shortage of unaffordable housing. The city's rationale that "any housing helps" as its justification for building thousands of new units without any affordable set-aside is a ruse. The situation in the west San Gabriel Valley, like much of southern California, is that the gap between housing supply and demand is so vast that simply adding inventory does virtually nothing to affect affordability.

Development that is both environmentally and economically sustainable

For the past 30 years, one could look at the city as having the overarching goal of city solvency through trickle-down economic development that focuses on sales tax revenues. This has resulted in the sell-off of public lands to businesses, the diverting of tax and grant funds to private entities, and the closure of our adult education and ESL program while for-profit colleges proliferated. Such policies and practices, while undoubtedly benefiting a select few, have not helped the majority of residents within the city. Figure 1 depicts the adverse effects associated with such practices. It follows that the General Plan and its EIR must address the need for jobs with livable wages and an enriching environment that can provide upward mobility for our residents. Such employers and their particular infrastructure needs must be factored into the next General Plan. For example, the city needs to consider joint training programs with a revitalized adult education program or local community college to provide a skilled workforce; or high bandwidth highways for either digital (fiber to the premise) or physical (transportation corridors with increased capacity beyond Level of Service D) movement of product or people.

In terms of the environment, the General Plan and its EIR must seriously consider the

San Gabriel Valley Area 3 Superfund site and vapor intrusion issues. The current General Plan ignored this entirely and was flawed and negligent as a result. Residents continue to foot the bill for treating contaminated water. Several sites in the city continue to release toxic vapors that are likely related to the Superfund contamination. The EIR needs to address the fact that adjacent residential areas have never been tested or analyzed for this toxic vapor in the southwestern portion of the city. Recent reports for the area near the former International Extrusion Facility show increasing groundwater contamination levels as recent as 2015. A report by GSA Engineering, Inc. for The Charles Company in November 2016 confirmed increasing levels that were not adequately explained. The U.S. EPA declared our city a Superfund site over 30 years ago, yet we are still trying to answer fundamental questions. A fragmented set of government agencies have allowed landowners and developers to take a passive approach. The city is responsible for addressing this issue on behalf of its people and is the only agency that can leverage ordinances on development to fix it. The General Plan and EIR must address this.

Air quality and traffic are obviously also required for the EIR scope. However, it is worth mentioning that the current General Plan failed to properly address this issue when it settled for a minimum Level of Service of grade D. Allowing all city streets and arterial highway intersections to deteriorate to this level, as the General Plan allows, is unacceptable.

Development that promotes social relevance and interaction amongst a diverse community

Here, space for gatherings such as open space and green space are key. The city is currently lacking in its metric of open space-to-residents ratio. The EIR must take a realistic look at the actual amount of open space that the city has toward this need. If the current open space inventory includes areas not accessible to the public (i.e., school facilities, church housing sites, railway land), they must be discounted. Also, proposed concepts such as the linear park above the railway cannot be taken credit for at this point without a feasible economic plan for its

realization, lest it be used as a ploy for passage of a flawed EIR.

**General Plan Comments**

The workshops and survey questions done to date have been disappointing because they have focused on the day-to-day concerns rather than the big picture. They fall short by asking specific yet generic questions rather than facilitating the larger discussion. By extracting only vignettes from the residents, it subjects the collected inputs to misinterpretation depending on how they are pieced together. It is not surprising that what the city has recently listed as the General Plan's "key goals and concepts" are actually just tactical measures (i.e., "Maintaining the character of existing residential neighborhoods"; "Fostering design enhancements along key corridors such as Main St., and Valley Blvd."; "Facilitating economic development in key locations that meets community needs and creates jobs, including creation of a new Medical Office designation along the Garfield corridor and a potential retail/entertainment district along Valley Blvd."; "Creating a cross-town parkway along the Union Pacific Railroad Corridor that would enhance recreational opportunities, ..."). These "goals" and "concepts" have no unifying policies and appear to the public as

disjointed. As a result, they reek of appeasement and pet projects.

As a policy document, the General Plan needs to state the overarching goals of the city and then remain diligent that all future developments can be traced back to it. This is important because stakeholders need to have a clear understanding of where you are going. Without the clarity of overarching goals, you have building projects that are too often considered on a case-by-case basis, with individual council members enacting "spot zoning" via the Specific Plan or a General Plan Amendment on a single piece of property at a developer's request.

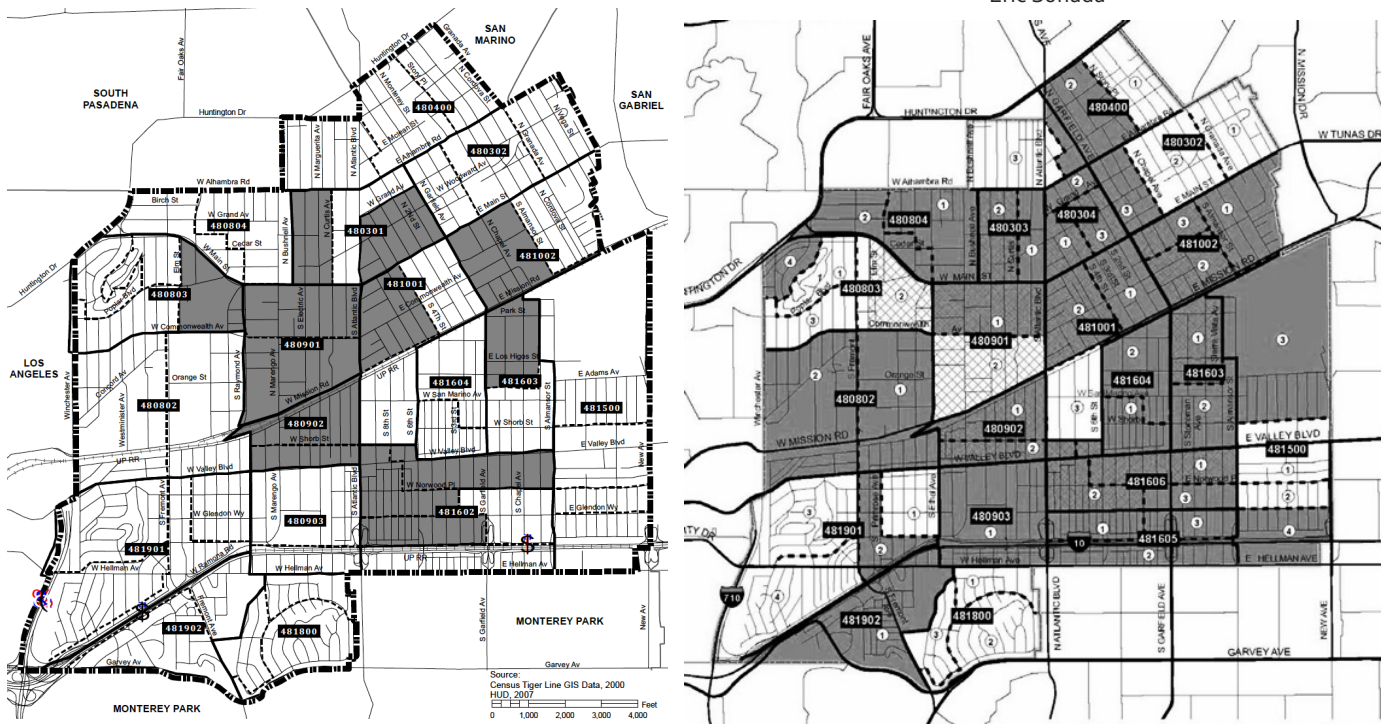
For discussion purposes, I will share my top-level policy goals:

- The city shall be developed to promote opportunities for social relevance among an ethnically and income-diverse community and protect against isolation and disenfranchisement.
- The city shall be developed such that it is environmentally and economically sustainable.
- The city shall focus on its residents. It shall be developed to promote their upward mobility and provide the

infrastructure and resources to invigorate their well-being.

From these goals, better clarity is achieved and the public can better engage with the General Plan and EIR process by asking, for example, how "maintaining neighborhood character" can be better related to affordable housing. Or how "design enhancements along key corridors..." will specifically encourage social interaction or tangibly improve residents' upward mobility. It also becomes clear that if the city intends to physically capture a customer base, it must develop with social relevance in mind. Whether it's dining that also promotes cultural interchange or shopping that also promotes social interaction, it's "experiences" that will bring people to an area for economic sustainability. Proper policy goals also encourage long-term planning instead of the pitfalls of short-term vision that have traditionally plagued the city. For example, based on my goals it becomes obvious that incubators should be created with grant funding instead of simply giving it to a retail business outright. Agree or disagree—it's not the point. The point is that a long list of such tactical measures would flow out of true policy goals, once clarified. Instead, the current path of the General Plan formulation appears to be struggling to see the forest from the trees.

Eric Sunada



**Figure 1**  
 Shaded areas indicate census blocks where 51% or more of the households are in the lower income bracket as of 2007 (left) and 2014 (right).  
 When it comes to helping its people, city policies and practices under the current General Plan have been less than effective.