



June 21, 2021

City of Pasadena Design Commission
Attn: Michi Takeda
Pasadena City Hall
100 N. Garfield Avenue
Pasadena, CA 91101

Re: Central District Specific Plan – Round 3

Dear Members of the Design Commission,

Pasadena Heritage would like to thank the Planning Staff for the continued commitment to the Specific Plan process, and for releasing the current draft plan in a format that is accessible, even during the current pandemic. Pasadena Heritage has some feedback on the proposals for the district, some of which provide clear suggestions, but also asking for further study or reconsideration in some areas. We very much hope that the Design Commission will carefully consider this draft and our comments and add its expertise to this critical discussion. The Central District is perhaps the most complicated of the proposed Specific Plans and has large concentrations of important historic resources to consider.

We submitted similar comments to the City Planners in late 2020, but have slightly revised this letter to reflect the objectives of this Design Commission review process.

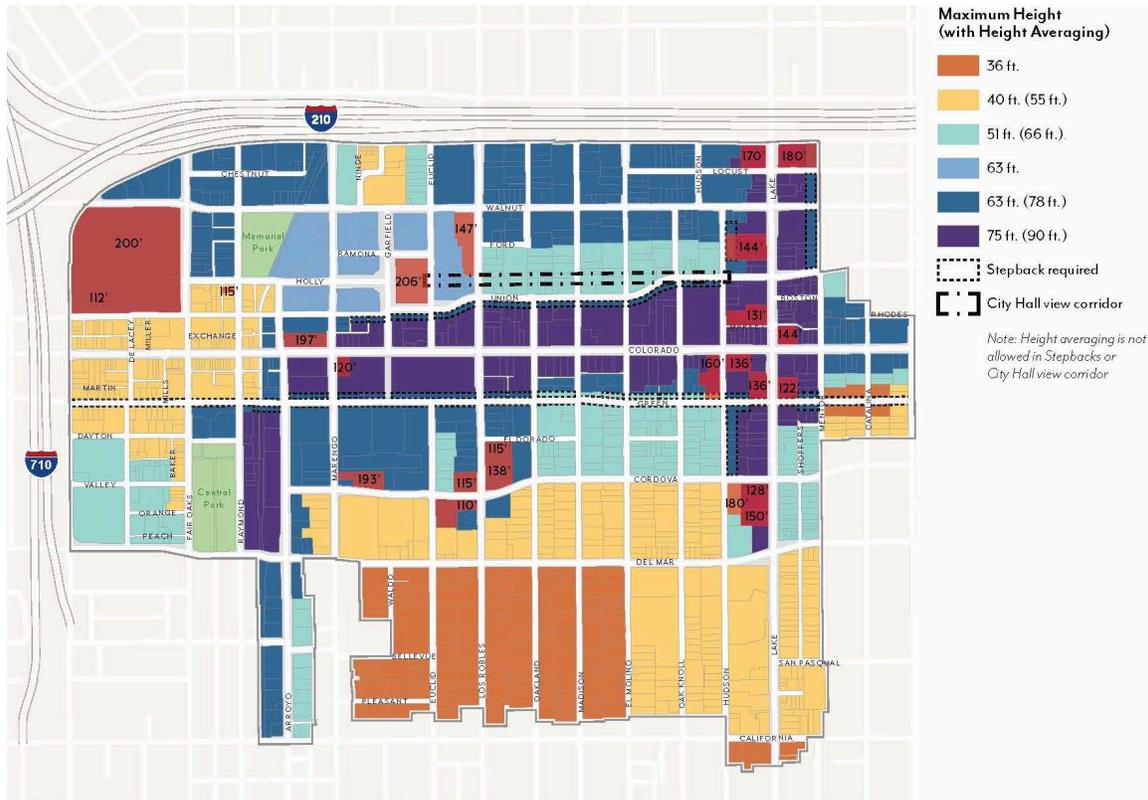
Redirect Height and Density Away from Historic Districts

The areas Pasadena Heritage is most concerned about are the many historic districts that comprise much of the Central District. The Central District is largely a collection of historic districts and there is too little information provided or detail developed on how best to plan in accordance to the existing buildings and community character.

One area of particular concern in the proposed plan is the middle portion of Colorado Boulevard and Green Street, near and around the Playhouse District. While the Playhouse District can accommodate some height and density, the proposed zoning appears as a dramatic increase from current conditions. When density bonuses are utilized, new projects will become even less compatible. On Green Street, density and heights threaten the very character of the streetscape, a low-scale commercial corridor with an established tree canopy. Conversely, the height and FAR maximums along Lake Avenue and Cordova Street are restrictive. There are a dozen high rises over 100' tall facing Lake Avenue or immediately adjacent, and yet new construction is proposed to have much lower density. The tallest is the Gateway Plaza at N. Lake Ave. and Corson St., which rises to 180'. To protect historic neighborhoods while allowing for responsible growth, the 3.0 FAR and 75'

height restrictions must be relaxed in areas where growth can be accommodated. We are not suggesting that heights along N. Lake Ave.

An important piece of information is missing and needed in the plan to support the proposed heights. An overlay map of existing heights, as opposed to what is proposed is needed. In historic districts, where heights are usually one to three stories, only a modest upzoning is appropriate. In more newly developed areas where high rises dominate, restricting development to midrise seems counterproductive.



Pictured: In many instances, existing towers greatly exceed the proposed zoning.

Consider Corridors, not just Districts

Instead of focusing only on contiguous sub-districts in the Central District, better attention must be paid to unifying and coordinating aesthetics along individual corridors. Colorado Boulevard is our main historic street, with a focus of walkability and a diverse mix of uses. Lake Avenue is a modern cityscape with high rises, modern architecture, and urban plazas. Union Street and Green Street serve as couplets encircling Colorado Boulevard – Green Street has concentrations of very low scale historic commercial buildings with breaks around the Civic Center and Lake Avenue where its character changes, but it is still a very walkable, pleasant street with many mature trees and shade. Union Street, the second part of the couplet, has again mixed character but is generally lower scale and more pedestrian friendly. Though these streets house different uses, they could be zoned similarly. Along each corridor, density may vary to better site uses near transit or near jobs, but factors

such as setbacks/stepbacks, allowable uses, and landscaping can remain largely consistent and provide continuity.

Allow for More Residential Units near Transit

At the Central District virtual meeting, it was clear that there were two main concerns expressed by participants. One group wanted to see heights reduced near historic resources and near residential zones. The other group wanted to see more housing near transit. Although these goals may seem in opposition, there is room to accommodate both. The simplest change would be to rezone the North Lake corridor from commercial only to mixed use and, as mentioned previously, to allow greater density there. One or two high-density, mixed-use buildings near Lake Station could add much needed housing units. Instead of spreading the construction of small and medium projects across the city, this would allow for targeted growth while keeping heights lower elsewhere. We believe that development pressure must be moved away from Old Pasadena and towards more suitable, developable areas.

Bring Civic Center into Compliance with OLIN Plan

The recently completed OLIN study of the Civic Center recommended a height of 60' for new structures adjacent to City Hall. The height of the subdistrict should be lowered slightly to this height, so that the district has a more uniform identity and City Hall remains the dominant focal point.

Protect Ford Place Historic District

Ford Place may be low-density but it provides the surrounding neighborhoods with accessible green space. With Fuller Seminary currently amending their Master Plan, would the proposed zoning take effect only in lots removed from the Master Plan? Because it is impossible to gauge Fuller's final intention, we ask that heights surrounding Ford Place be reduced to protect the district.

Adopt Consistent Setbacks Standards on Green

The East Colorado Specific Plan laid out specific setback standards for Green Street that would protect the existing ficus trees by stepping back above the first floor. These standards should carry over into the Central District, to provide consistency along Green Street and protect these mature trees that add so much character.

Remove Public Open Space Requirement for Green Street

There is little use for public open space facing Green Street, which serves as a collection of small businesses, and where it is important to maintain a street wall at ground level. Public open space here can detract from rather than reinforce the look and feel of the street. Open space requirements should, conversely, apply on Del Mar, which has a less cohesive character, a wide range of building types and styles, and where more residential

housing will inevitably be built. More public open space needed where there are more residents to use and enjoy it.

Embrace Modernism on Lake Avenue and Cordova Street

If there is a place for modernism in Pasadena, it is on Lake Avenue and Cordova Streets. Lake Avenue has probably the best collection of Modern commercial buildings citywide. The former Bullock's on South Lake Avenue has been a major advocacy issue (and victory) for Pasadena Heritage in the past, and the neighborhood surrounding it has been somewhat reinvigorated in recent years. Pasarroyo, formerly the Corporate Center Pasadena, brings height to the district but also public seating areas, active ground floor uses, and landscaping. Cordova Street has some mid-century hotels and offices, and some Modern multifamily housing. Recent infill has been notably more historically referenced, and the Arpeggio and Terra Bella apartment complexes take the architectural character of this street back in time, though a mix of styles is common in the City. Quality development and good design should always be the top criteria, but a range of styles, including Modernism and good contemporary design can have a place here.

Zoning is one factor driving design in this corridor, as setback requirements and height limits encourage developers to build nearly lot-line to lot-line. While this may be appropriate for the Playhouse Districts, with its collection of Mediterranean Revival courtyard buildings, it seems inappropriate for Lake Avenue or Cordova Street, where more slender buildings could allow for more public open space which is particularly important along these streets.

Further Reduce Onsite Parking for Transit Districts

This comment was also submitted for South Fair Oaks Specific Plan, and has been slightly modified.

Areas near the Del Mar, Memorial Park, and Lake Metro Stations should have specialized parking standards which can be lower than what is proposed. Because they are so close to transit, the necessary parking should be intentionally less than what is required for the rest of the district. On the sites closest to the Metro stations, it may even be possible to further reduce required parking for residential development, if strategies like onsite car share are used. Visitor parking, commercial loading spaces, or designated drop-off space may still be needed, but even one space per unit may not be needed given high transit accessibility and walkability. If this reduced parking strategy does indeed encourage public transit use, Pasadena should strongly embrace the idea that reducing traffic means incentivizing people to give up cars.

Raymond Avenue Should be have a Multi-Modality Focus

This comment was also submitted for South Fair Oaks Specific Plan, and has been slightly modified.

Despite lower traffic volumes and easy access to transit, Raymond Avenue is not reflective of the vision established in this plan. We are also concerned that a range of individual historic resources along this street need to be given careful consideration in the plan. We

understand that the charge of the Specific Plan update technically ends at the sidewalk, but rezoning without addressing the street makes little sense. More information is needed about how traffic patterns will shift with the end of the 710 Freeway and what role Raymond will play in carrying traffic between the 134/210 Freeways to the Pasadena Freeway and keeping it out of residential neighborhoods. That said, if Raymond Avenue will become a transit core neighborhood, more thought needs to be given as to a multitude of improvements. For example, a protected bike lane running along Raymond Avenue could link three L (Gold) Line Metro Stations: Fillmore, Del Mar, and Memorial Park provide residents of the South Fair Oaks Specific Plan bike access to two parks, Central Park and Memorial Park, and access to Old Pasadena. The street could be made more walkable with more plantings and street furniture, especially as it is the middle north-south route between busy Fair Oaks Ave. and Arroyo Parkway.

Support Setbacks and Stepbacks next to Historic Resources

We support the setback and stepbacks proposed for development adjacent to historic structures. However, we believe that targeting growth closer to transit and away from historic structures is critical to an effective overall approach.

Reconsider Façade Modulation and Façade Length Standards

This comment was also submitted for previous Specific Plans.

While we appreciate the concept that is driving these proposed modulation standards, we nonetheless find them potentially problematic. Long, unbroken facades can detract from a neighborhood, but there can be other, more refined ways to address them than prescriptive plane breaks. One of the most unattractive trends in contemporary architecture is the protruding boxes (most often balconies) that suspend from the façade. These are often clad in metal or faux-wood, or painted brightly. In many cases, the negative visual impact of these buildings is due largely to the visual clutter on the façades. There are simply too many boxes, too many colors, and too many materials on many of these newer buildings. Along this line, the requirement that the modulation be of different material should be avoided as too prescriptive and likely to foster the visual clutter noted above.

Jane Jacobs wrote about establishing a street rhythm, a theme that has been embraced by city planners for decades now, and we recommend reasonable standards that would move buildings in that direction. A building may be organized in repetitive bays, with various small shops at ground level, or it may have individual garden apartment entries at ground level, or it may have inset balconies at even intervals. We fear that the recommended 2' modulation will not create the intended rhythm, and may make buildings more arrhythmic and asymmetrical. Design solutions such as deeper inset windows, appropriate balconies, and/or louvers may provide enough relief to a façade without a major break. We suggest further study on how older buildings in Pasadena and environs avoided monumental, blank façades in the past.

If a breaking the building remains part of the Plan's direction, we suggest requiring a wide and deep cut into the façade, and not a protruding element. This cut would be required to have a set level of transparency, such as transparency of 50% or more. It could have a

curtain wall façade treatment or a relatively transparent rain screen system. These options would be a more modern approach. Alternatively, the building can be fully broken into separate masses, which could be connected by open-air walkways at upper levels, a more traditional approach. Finally, we could support reducing the modulation requirement down to 20% from 25%.

Convert 1' Frontage Zones into Sidewalk or Increase Depth

This comment was also submitted for the previous Specific Plans.

It is unclear what amenities could be provided in a 1' frontage zone. Either the width should be increased to a meaningful measure or it would be better to leave the area as walkable sidewalk.

We thank you for considering these comments. This Plan Area is the City's most important, so we will continue to review it and may provide further comments at a later date.

Sincerely,



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director