

Varsh, Tess

From: Andrew Salimian <asalimian@pasadenaheritage.org>
Sent: Tuesday, February 9, 2021 5:10 PM
To: Varsh, Tess
Cc: Sue Mossman
Subject: Planning Commission 2020-21 Workplan
Attachments: PH Planning Commission 2020-21 Workplan.pdf

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To Tess Molinar,

I understand that the Planning Commission is setting its 2021-21 Workplan tomorrow evening, and was hoping the Commission would be open to considering a few more areas of study. Attached is a letter with four areas Pasadena Heritage has identified, and hope they can be considered. Please pass on to the commissioners. I look forward to tuning in tomorrow.

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CORONAVIRUS POLICY: Out of an abundance of caution, Pasadena Heritage staff may be working from home. I still have access to email, but you can additionally be reached on my personal cell.





February 9, 2021

City of Pasadena Planning Commission
Attn: Tess Molinar
Hale Building
175 N. Garfield Ave., 2nd Floor
Pasadena, CA 91101

Re: Commission Workplan FY 2020-21

Dear Members of the Planning Commission:

We very much appreciate the important work that has been done over the past year. The Historic Preservation Ordinance Amendments, Mansionization Ordinance, SRO Ordinance, Mansionization Ordinance, and Updates to CEQA Traffic Analyses were all complex, yet important changes to the Zoning Code. 2021 will be another busy year, with the Specific Plans, Housing Element, and Housing on Religious Sites to be finalized. Through our advocacy efforts over the past year, we have identified a few other areas that we would ask the Planning Commission to consider for review. We have identified four issues that are most important to us, and hope you can devote time in your already busy schedule to at least consider them as information items or study sessions.

Study/Reevaluate Planned Development Process

Although the Planned Development process gives some flexibility for developments on larger sites to create their own zoning, a few PD projects in the planning pipeline seem to be using it only to upzone parcels prior to Specific Plan finalization. A few of the proposed PDs, notably those in Northwest Pasadena, have faced some criticism from neighbors who feel that this process is maximizing housing at the expense of the community. Pasadena Heritage believes that providing some flexibility to large sites makes sense, but given the recent proposals, we question if these projects are actually being improved by the PD process rather than follow existing zoning standards? Planning Staff and residents have spent countless hours in creating our City's General Plan and Specific Plans that projects on sites larger than two acres are not required to follow. Given the added costs, delays and review time to approve these projects, would it not be simpler to just build to current zoning? What does the community gain from this special PD process? We hope the Planning Commission will take a good look at this PD process. Perhaps some meaningful changes can make it more effective, such as changing the required findings, changing the two acre minimum lot size, or even eliminating the Planned Development option. It may be that the PD process is allowing for more housing to be constructed than otherwise would have been, but we do not believe it is working as intended.

General Plan Amendments

In our work evaluating the Specific Plans, we have identified at least two subareas that we believe could benefit from General Plan amendments. These two subareas are both along N. Lake Ave., but in the two different Specific Plan Areas. In the Central District, what is known as the North Lake subarea, or the stretch between Colorado Boulevard and the 210 Freeway, is zoned high commercial with no residential allowed. With a 3.0 FAR and 75' height (or 90' with height averaging) maximum, this area allows the same base density as parcels along Colorado Boulevard in the Playhouse District NRHD. However, when the State Density Bonus or Affordable Housing Concession Menu is employed, we expect more density may be sought along Colorado Boulevard. With immediate access to the Lake Metro Station, no real impact on historic resources, and existing high-rise office towers, we believe that a good deal of new mixed-use and residential construction can be accommodated in this North Lake subarea, rather than in the Playhouse District. Another such area is along Lake Avenue north of the 210 Freeway, between Orange Grove Boulevard and Mountain Street. The strip of low commercial proposed is a dramatic step down compared to proposed adjacent uses, but can only be changed through a general plan amendment. It could accommodate two-to-three story mixed use quite well, which would be a dramatic improvement over the drive-thru strip that exists today. We ask that when reviewing the upcoming Specific Plans, you give your attention to where such amendments might be prudent, and ask City Council to consider them in parallel to the Specific Plan Update.

Reconsider TOD/Central District Parking Standards

One consistent concern we hear from members of the community, including groups like Keep Pasadena Moving and the Madison Heights Neighborhood Association, is that there is too much traffic associated with new development in the Central District and that it is overflowing into residential neighborhoods. To counter this reality, we were glad to advocate for and support stronger traffic CEQA thresholds. Proven tools for reducing traffic associated with new development are reducing onsite parking or unbundling parking. Although our TOD parking standards do allow a slight reduction in onsite parking, the number of new parking created is still exceedingly high, especially for those sites closest to transit. For larger developments, hundreds of parking stalls are required in multi-level subterranean structures. In order to place common sense limits on new traffic, we hope the Planning Commission will reevaluate these standards, either through the Specific Plan process or through the citywide zoning code.

Senate Bill 9

The successor bill to Senator Scott Wiener's SB50 and SB1120, allowing for lot splits and two units per lot in single family zones, has been introduced. The law is likely to pass but does allow municipalities some control as compared to previous bills. Pasadena would be allowed to apply "objective zoning standards, objective subdivision standards, and objective design review standards" that do not prevent the construction of the units. Thankfully, historic districts and landmarks are exempted in this bill, but there are a lot of single-family zones in Pasadena that will be affected. We ask that the Planning Commission take a good look at our standards to make sure they are in accordance with the law, and that we adopt the strongest standards allowed by law. Another option worth exploring is to rezone RS-6 zoned areas as RM-12. It would still allow two units per lot (plus an ADU) but would

prevent lot splits, which could be complicated and could lead to unnecessary teardowns. We would like to hear from the Planning Commission and City Staff whether this is a viable option if SB-9 passes.

Thank you for considering our viewpoint and comments. As advocates for historic resources and historic neighborhoods, we understand how planning policy plays a major role in our built environment. We hope you can study these items as a way of modernizing our City Planning while ensuring protections and respect for Pasadena neighborhoods.

Sincerely,



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director