

## Varsh, Tess

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**From:** Nina Chomsky [REDACTED]  
**Sent:** Tuesday, May 25, 2021 2:11 PM  
**To:** Varsh, Tess  
**Subject:** Planning Commission Meeting 5/26/2021; Agenda Item 4.A. Planned Developments

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Planning Commission, City of Pasadena

Re: Planning Commission Meeting 5/25/2021; Agenda Item 4.A. Planned Developments

Chair Olivas and Commission Members,

I am writing in my individual capacity. I realize that this Agenda item is not an "action" item, but, in my opinion, the Planning Commission should consider a future Agenda action item to abolish Planned Developments (PDs).

PDs encourage and invite the clearance of large land areas in commercial and residential areas, thereby resulting in the destruction of character-defining existing buildings and businesses/services – reminiscent of the worse aspects of Redevelopment -- and, because of the large areas involved, the resulting development usually and typically is out of scale and out of character. The impacts of recent PDs are deleterious and lead to land clearance because Pasadena generally is a built-out City. PDs might have served some good purpose in the past, but not anymore.

Also, even when a PD is proposed without much land clearance, as was the case with the 99 Cent Store PD, it was clear to many of us that because that proposed development was so large, adjacent areas would "fall" next – the "domino" effect of PDs, particularly in the context of rising land values. In the case of the 99 Cent store proposed PD, the area in danger was the historic Villa Parke neighborhood and other adjacent neighborhoods.

The ability of PD developers to design and create, and have adopted, their own zoning and, with some exceptions, design rules further encourages and invites poor development. Whatever protections are included in underlying zoning and most design guidelines, in effect, are swept away with the false idea that, somehow, the developer-designed new zoning and design rules are "better" and "improved" because staff and decision-makers can "review" these new rules without extensive public participation. In fact, "make up your own" rules usually result in developer-driven rules and process – planning by Project rather than planning by codes, rules and guidelines adopted through extensive public participation and process and then applied without bias to various project proposals. Further, if staff and decision-makers are biased and weak, the more dominance and control the developer can exert over the PD process. PDs these days undermine public participation in the planning process.

Plus, PDs continue to clash with the State's ever expanding and increasing Density Bonus rules. Many of us thought that the Concession Menu approach to Density Bonus rules would lead to multi-family housing buildings which are smaller in scale and more in character – instead, we face PDs that invoke and benefit from State Density rules rooted in the underlying General Plan 87 units per acre Base Zoning. Staff has not yet fully addressed this issue in the Density Bonus context. Do PDs get to be "denser" and more out of scale because of the interaction of the PD and State Density Bonus rules? Why do PDs get to proceed on a separate Density Bonus track?

Thank you for your consideration of my comments.

Sincerely,

