

June 22, 2021

Design Commission

100 North Garfield Ave.
Pasadena, CA 91101

RE: CENTRAL DISTRICT SPECIFIC PLAN

An alarming pattern has been trending that is jeopardizing Pasadena's historically tree-lined character. Specifically, the tree canopy within Pasadena's urban core is quickly dwindling. This is not simply an issue of the number of trees in the city, it is a question of having an attractive, cohesive collection of tree growth along streets and public areas. The recent example spurring this concern occurred just a few months back at 180 South Euclid. Three ficus trees were damaged by the developer who has put the development on the "urban edge" and ultimately the trees had to be removed (photo attached). How did we lose three mature trees in a historic laden neighborhood for the sake of one development? It is important to understand both how this is allowed to happen and how to avoid losing mature trees in the future.

A short explanation for how the trees have been dwindling is the "activating the street edge" or urban-edge zoning implemented by the City of Pasadena. This includes design guidelines set by the city to accommodate "public use at the ground floor." According to the city, activating the street edge is "critical to a socially and visually stimulating downtown, and street-level facades offer the greatest opportunity to support pedestrian activity." But now, with the recent loss of massive healthy trees on Euclid for one development, we can see how this type of zoning can result in the loss of mature trees, even on public land.

I am hoping the recent destruction of these three trees may set new standards and ideals for our city moving forward. ***All mature trees are potentially at risk of removal as new buildings jut up against the mature canopy.*** These effects can be seen along Green Street already, where the streetscape displays fewer and less robust mature trees, particularly in front of buildings that have been erected in the past five to ten years.

Urban-edge zoning results in a variety of problems, both on private and public land, that directly affect the tree canopy along our streets and public spaces. One problem is that mature and protected trees on private property in the Central District are permitted for removal as long as the trees are replaced by the developer. This includes the removal of trees on the edge of the property, as long as replacement trees are integrated somewhere in the development. The zoning leaves no room for in-ground soil around the perimeter of a new building that could be used to plant replacements of uprooted trees.

As a result, developers generally replace damaged trees with potted trees on concrete or trees located inside building courtyards where they do nothing to enhance or maintain the public

space. This results in the reduction of private trees at the periphery of new developments, where they would be in public view and contribute to the city's tree canopy. The consequences of urban-edge zoning can be seen along Walnut where large new developments have replaced perimeter trees with plants in pots atop concrete. If this happens along other streets like Lake, Los Robles Avenue and Madison Avenue in our Central District, the look and feel of our city will change permanently.

Aside from diminishing the beauty of the city's streetscape, maintaining mature trees has the practical effect of reducing the heat island effect, which occurs in cities with an excess of concrete and a shortage of vegetation. Many communities are now taking steps to reduce urban heat islands through policy initiatives which include stronger tree and landscape ordinances, comprehensive plans and design guidelines protecting trees, and zoning codes which provide enough perimeter around new buildings to plant trees in order to create canopies. If we don't follow suit, we are putting at risk the trees that provide the evaporative cooling needed to keep our urban heat island index low. We have all experienced the high temperature and pollution of those hot summer days in our Central District, and the removal of trees has been a major contributor. The current solution adopted by developers, potted plants on concrete, will never provide protection from growing urban heat islands the way a mature canopy of trees will.

As the city is in the midst of revising its Central District Specific Plan, we need to question this policy of urban edge development as it relates to our tree canopy. We must use this opportunity to voice our concerns and shape the guidelines that will affect our city for decades. Our new specific plan must adopt more stringent policies on tree planting and protection both on public and private property, including the following:

- 1) We should not allow subterranean garages from going lot line to lot line, destroying all trees on the property;
- 2) We must ask for the protection of the large, mature trees that sit between building lot lines to avoid sacrificing our urban canopy for subterranean parking garages;
- 3) Design rules need to be changed to encourage the integration of protected trees into new development plans and the city must show demonstrated effort in encouraging the developer to design with the tree in mind.
- 4) We need to amend our zoning code and specific plan to allow bigger setbacks.

The next big development coming to our city must take our tree canopy into consideration. It is the city's duty to protect its current residents from development that might hinder the livability of our city which includes a healthy environment. In addition, our city is quickly losing what differentiates us from other cities: mature trees. In fact, USC Dornsife researchers say "mass-produced dwellings and home expansion have reduced residential green cover as much as 55 percent" and in this study from 2000-2009 Pasadena's canopy has been reduced by 10 percent and this is well before the high-density development movement even began. Pasadena's largest mass development, currently in process at the Parsons property near Old Pasadena, has removed an enormous amount of mature public and private trees leaving the question as to how they will possibly recover the loss with a new urban canopy.

I would also like to mention the upzoning of the corner of Lake and California with zero setbacks will be a serious issue going forward. Residents of MHNA like having a grocery store with trees and a parking lot. The residents are also concerned about the Central District plan placing such high density with minimal setbacks next to single family neighborhoods as the newest plan shows (see attached). What happened to the ideal there would be a gradual increase in density and height?

We must ensure that the city we pass down to our children isn't made concrete. It is up to city staff and council to protect us from development that contradicts this fundamental imperative. While our city does have tree protections in place, it is clear they are not enough. The city needs to take a stronger stance on maintaining mature trees in the urban center by allowing more room for trees to be protected and grow. We must create a city that has strong urban forestry efforts with dense vegetation and a beautiful urban canopy. We need to ban together and insist on stronger and more stringent views towards our urban canopy.

Thank you,

Erika Foy



Central District Specific Plan Update *DRAFT*

