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June 21, 2021

Pasadena Central District Plan Updates need Further Cultural and Preservation Protections

I am writing to the Design Commission today to raise continued issues within the Central District that are not addressed adequately in the current Update for your review on June 22, 2021.

As a past 3-time Design Commissioner, Community Development Committee (during Redevelopment years) and Library Commissioner, and having lead the one and only successful Growth Management Initiative in 1989 that lead to a major overhaul of Pasadena's General Plan, I have working knowledge of the Design Commission's role and bandwidth to ask that you please advise the Planning Commission to take a serious and critical look at the heights and FARS in and around the Central District, specifically in the Old Pasadena sub-district, and other areas/districts with shared or adjacent-to parcels with historic resources.

For the last two decades Pasadenans (both Commissions and residents) have continued to face down oversized proposals that in their initial submissions challenged and impacted historic resources and landmarks, whether adjacent to or on shared landmark parcels.

The most famous example is the **IDS Project**, which based on zoning would have dominated the Playhouse district and overshadow the Pasadena Playhouse and adjacent historic resources. As we all know, by lawsuit the City was forced to reject the approved proposal and downsize the project (as well as require necessary transportation infrastructure to be part of the proposed new project). This result speaks for itself, but we cannot lose sight that zoning failed this impacted site.

Fast forward a bit to the dreadful **86 S. Fair Oaks project**, an on-going saga of over a decade that continues to be the overpowering proposal for a revised 7-story stand-alone, dominating structure to block out the historic Castle Green and Green Hotel Apartment's 120-year elegance and position in Old Pasadena, disrespecting the National Register *district, block parcel* by towering to complete and diminish these long-established and most important landmarks.

The problem in a nutshell is the high-transit designation of that parcel that ignored the significant historic resources that require a more sensitive and diminished zoning envelope. I know this as I argued in 1994's General Plan revision not to provide an overly impactful high FAR and heights at this parcel in ignorance of it's National Register obligations. Yet the latest revision is a towering project that merely adds a density bonus, pushing beyond appropriate heights, eliminating necessary respectful setbacks and trying to become the most visible and dominating building on the block – all in violation of the Secretary of Interior Standards and certain of best practices for such a sensitive site. (And as you all know this is NOT a new project but a *revision upwards* of the failed 2015 FEIR project with a density bonus).

And to add insult to injury, an abbreviated SCEA EIR process is being pushed by City staff, in violation of CEQA by ignoring once again the real and now more substantial historic and cultural impacts previously ignored by the smaller uncertified 2015 FEIR project. Further distorting transit's blindness, no roadway, intersections or safety transportation improvements are required, although the staff has previously acknowledged that impacts to Dayton Street (and likely the two unsignalized intersections) are beyond acceptable impacts.

The next example is the **960 E. Green Street** building, that utilized the overzoned Central District zoning to dominate and overpower city landmarks once again. This project was rejected out of hand and is struggling to return with a downsized revision.

Let's also look at the somewhat more successful Theo apartment development at **289 N. El Molino Ave.** Without revisions, this project would have dominated one of the oldest structures in the greater Pasadena area, and important Victoria home and landmark. Without Design Commission's critical stewardship and in this case Pasadena Heritage's huge time investment, this project also would have overpowered a most important site because the zoning was just too much.

Are we letting our zoning be taken over by Transit's relaxation or ignorance of cultural and historic protections? Heights and sizes of buildings adjacent to landmarks and historic areas must be taken out of 'transit's' blind spots, and

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zoning is constantly challenging one of the cornerstones of the past and future of Pasadena: our architectural heritage that matters and defines the city, that must be better respected and further protected.

We are being told by Sacramento that our densities must increase, that heights and other zoning measures best left to local conditions will be overridden for the sole sake of increased density. Yet Pasadena in the past has attempted to craft zoning to fit neighborhoods, districts and other strong local conditions, only to be told the State wants a one-size-fits-all approach.

In 2018, the City Council recognized that infill development impacts historic neighborhoods and districts. Here is an insert from Pasadena Heritage's *July 2018 Newsletter*:

### **No Consensus at Council on Reducing Development Intensity**

The City Council reviewed recommendations at its June 11 meeting from the Planning & Community Development Department on an interim ordinance that would reduce the intensity of new development projects in Pasadena. The California State Legislature has enacted numerous bills intended to address the statewide housing shortage. While these laws address a serious problem, in a built-out city like Pasadena, they could force infill development in historic neighborhoods and detract from their character. This is one reason why the City is considering this temporary measure now, rather than waiting for the Specific Plans to be updated by the target date of 2021. At the Council meeting, several options were described, and City staff recommended limiting the maximum height of new buildings, arguing that height affects the compatibility of new and existing buildings most. Local developers and proponents of affordable housing voiced substantial opposition, with several requesting that the matter be dealt with in the Specific Plans instead. The Council could not reach a consensus and directed staff to investigate this complex issue further and provide new recommendations. Pasadena Heritage will continue to monitor this matter closely.

I sincerely hope that the Design Commission pushes the Planning Commission and staff for stronger protections than the current revisions and asks for a fresh look at historically sensitive sites and districts within the Central District, not only at infill parcels (86 S. Fair Oaks, 960 E. Green, etc.) but district-wide. Please as a Commission advise the Planning Commission to reject this blind dominance of 'transit-rich' designations that allow *at best* the minimization of a fair analysis of cultural and historic impacts, and at worst conflict with the very principals and goals of our long-standing Central District and sub-district plans.

Sincerely

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