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July 27, 2021

Design Commission, City of Pasadena
175 N. Garfield Avenue
Pasadena, CA 91101

Re: Draft East Pasadena Specific Plan

Dear Commissioners:

I am the managing partner of Hastings Village Investment Company, L.P., the owners of the Hastings Village Shopping Center located at 3341 E. Foothill Boulevard and Hastings Ranch Investment Company, L.P., the owners of the Hastings Ranch Shopping Center at 3745 E. Foothill Boulevard. The following are our comments and suggestions for modifications to the current draft of The East Pasadena Specific Plan (the draft plan). I have attached a copy of our letter to Director David Reyes which contains more detailed comments on land use, zoning and development standards found in the plan.

As an introduction, it is worth noting that Hastings Village, at approximately 20 acres, is one of the largest privately owned single parcels in the city and, along with Hastings Ranch, the tenants on the sites have served the community for decades and are amongst the largest sales tax generators in Pasadena. Given their size, proximity to the light rail station at Sierra Madre and their visibility from Foothill Boulevard, the evolution of these sites has the potential to transform east Pasadena from its current status as a series of retail shops in a landscape of asphalt parking to a more walkable, vibrant neighborhood which includes shops, a variety of housing densities and types and employment opportunities, and supports the transit investment at the Sierra Madre station. The sites also have the potential, if given the appropriate densities and urban design standards, to make a substantial contribution to meeting The City's Regional Housing Needs Assessment (RHNA) goals.

We suggest a few key modifications to the draft plan to provide the appropriate regulatory framework to realize this transformation. The draft plan splits the Hastings Village site into two zoning districts, the eastern portion of which does not permit housing or retail uses. The western portion permits low density housing but does not permit retail. The concept of splitting a parcel into two zones has traditionally not been an idea that is supported in planning practices. We suggest a second look at these land uses to provide a mix of land use and a variety of housing types on the entire parcel. In addition, although we support the concept of providing paseos to help scale large blocks, the current proposal dictates two east west paseos connecting an area proposed to be zoned R&D through a commercial/mixed use area. A third, north south paseo is also required on this site. We would request more flexibility in the location of the paseos permitting a comprehensively planned site connecting mixed use neighborhoods with transit.

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There are significant differences between the light rail stations located in The Central District and the light rail station at Sierra Madre and the transit overlay zone should reflect these differences. Foothill Boulevard is a major east/west automobile commuter street and has several uses along it that are auto oriented. We would ask that you permit drive-through uses along the boulevard, with the caveat that they be designed in a manner that is consistent with a walkable neighborhood.

We would also suggest a look at the land uses and standards proposed in the draft plan in light of recent state legislation that limits communities' ability to impose more restrictive standards on sites that permitted housing. This may include densities, setbacks, sidewalk widths and building height.

The potential to work with the Commission, the community and city staff to re-envision the Hastings Village site is exciting and we hope that you would carefully consider our suggestions in this letter and put in place a plan that permits a dialogue with stakeholders on a variety of ideas and land uses on the future of this parcel.

On behalf of the partners of Hastings Village, we thank you for your consideration of our suggestions and look forward to continuing our dialogue.

Sincerely,



Ira Smedra

IS/lt

Attachment

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January 13, 2021

VIA ELECTRONIC MAIL

Mr. David Reyes
Director
City of Pasadena
Planning and Community Development
Department
175 N. Garfield Ave.
Pasadena, CA 91101
E-Mail: davidreyes@cityofpasadena.net

Re: Draft East Pasadena Specific Plan - Comments and Suggestions

Dear Mr. Reyes:

We contact you on behalf of Hasting Village Investment Company, L.P., the owner of the Hastings Village Shopping Center ("Hastings Village"), located at 3341 E. Foothill Blvd., Pasadena, and Hastings Ranch Investment Company, L.P., the owner of the Hastings Ranch Shopping Center ("Hastings Shopping"), located at 3745 E Foothill Blvd., Pasadena. We provide you with our comments and suggestions on the current draft of the East Pasadena Specific Plan ("EPSP").

We recognize the Department's extensive work in hosting open houses and workshops, drafting visions statements, plan concepts, and plan standards, accepting public feedback, and otherwise transforming the City's 2015 General Plan Update into this document. Thank you for those efforts.

We note that these two shopping centers provide important retail shopping locations for the area, much needed employment opportunities for nearby residents, and valuable tax revenue for the City of Pasadena. Indeed, we understand that the Best Buy store in the Pasadena Village was one of the top sales tax generators for Pasadena over the last year.

We are also quite mindful that in the community planning field rarely will things remain the same for long. Over the last several years, especially during the pandemic, we have all witnessed the dramatic changes impacting the retail industry and the impressive increase in on-line shopping. Similarly, throughout California, but especially in Southern California, there is expanding need for housing, especially affordable housing. Being aware of these and other trends, we envision that in the next 10 years, if the owners are provided with the appropriate

incentives, both of these shopping centers could likely begin the transformation process to mixed use retail/commercial/residential projects.

We note that the Hastings Village site is uniquely able to transform into the exactly the type of project envisioned by the General Plan – an in-town suburban environment with higher-density mixed-use developments incorporating retail, office and housing uses, to provide more opportunities to walk and use transit. The site encompasses approximately 22 acres of land, all under single ownership. With the right zoning incentives, a new project on this site could truly become something about which the entire community is proud.

Our comments and suggestions to the draft EPSP, referenced by pages, chapters, and sections, are as follows:

Chapter 4.1 Land Use.

On pages 6, Maps 4.1-2 Allowed Uses, and Page 8, Maps 4.2.1 Zoning Designations, Hastings Village is divided into two different zones for allowed uses and three different zones for zoning designations, and Hastings Shopping is divided into two different zones for allowed uses. The dividing lines on these two maps do not appear to relate to any known legal parcel lines, and there is no specificity provided as to the exact dimensions of the designated areas. Unless rectified, these planning lines will create significant headaches for owners and planners down road. Our preference would be to have a single higher density designation for each of the shopping centers, with development standards that call out with more specificity the areas for setbacks, stepbacks, heights and the like.

Chapter 4.2 Zoning Districts.

Properly designating allowed uses and permit requirements can alleviate the need for zoning code amendments in the future. Importantly, under this draft plan, Hastings Village – as mentioned, a major sales tax generator for Pasadena - is designated to be in the CRDC zone, where General Retail is (curiously) not permitted. We assume that this must be a clerical mistake. At least we sincerely hope so. Accordingly, we encourage a close look at these designations.

1. Page 11, Commercial Recreation – Indoor: Under CRDC, change to C.
2. Page 13, Bar, Night Club, or Tavern: Under CRDC, change to C.
3. Page 13, Restaurant, Take-Out Only: Under CRDC, change to C.
4. Page 13, Commercial Entertainment: Under CRDC, change to E.
5. Page 13, Electronic Game Centers: Under CRDC, change to P.

6. Page 13, Liquor Stores: Under CRDC, change to C.

7. Page 16, General Retail: Under CRDC, change to P. [The draft EPSP provides that General Retail (other than Big Box Retail) is not permitted on the Hasting Village site, but interestingly, Big Box Retail is permitted.]

While possibly beyond the scope of a particular specific plan, we note that under the current Zoning Code, drive-thru establishments in a transit-oriented district are not permitted. In light of the on-going pandemic, stay-at-home orders, and health precautions, we feel that drive-thru establishments should be conditionally permitted in all areas.

Chapter 5.1 Sidewalks.

We concur with the importance of sidewalks and the role that they play in good planning. We especially agree with the statement in Figure 5.1-2 that FAR should be calculated based on full parcel area, not the reduced area if required to meet sidewalk width minimum.

Chapter 5.3 Paseos.

We understand the importance of paseos in creating pedestrian pathways and, especially in large shopping centers, breaking up the large massing of buildings. The plan also encourages the use of paseos as fire safety lanes, which we applaud. However, we strongly believe that the detailed requirements of this section require more thought, further consideration and revision. For example, this section specifies the signage, hardscape, softscape, lighting and trash enclosures that are required to be contained in the paseo. While these amenities are desirable, if the paseo were also designated as a fire safety lane, we expect that the Fire Marshal will not allow these appurtenances to interrupt a proper access route for life safety purposes. In addition, on Page 32, under Accessibility and Safety, the rules limit property owners from using the paseos for private events to no more than once per month. We do not feel that this specialized governmental guidance on how best to operate a private shopping center is welcome or needed. Furthermore, and very importantly, the standards fail to recognize the legal complications and potential legal liability that paseos create for property owners. For example, on Page 35, under Amenities & Programming, the standards assert that paseos should be considered as sidewalks for street vending purposes. If this were the case, the property owner could lose control over occupancy rights to its center, possibly have conflicts with its rent paying tenants, and might become financially responsible for the harmful acts of such vendors. These issues when combined do not reflect informed planning. We need a do-over here. (Also, as with sidewalks, the FAR for the site should be calculated based on the full parcel, not the reduced area to meet paseo requirements.)

Chapter 6.1 Scale.

As we mentioned previously, we believe that with both shopping centers there exist real opportunities to create a new live/work type of environments with the many amenities that the East Pasadena residents have been seeking. Unfortunately, with an intensity of development set at a very low 32 du/ac for both these sites, the necessary density to incentivize such change does not exist.

Section 6.1.1 Density and Intensity.

1. Page 41, Section 6.1.1.A.1: We completely agree that a reduction in buildable area due to dedications/easements or setbacks must not reduce maximums.

2. Page 41, Section 6.1.1.A.2: Limiting the CRDC area to 32 du/ac is not sufficient to encourage residential development. Because Planned Developments in the current Zoning Code do not allow for uses that are not otherwise permitted in that area, it must be made clear that with a PD in this zone, residential uses will be allowed.

3. Page 41, Section 6.1.1.A.3: Is the concept here that there would be multi-story townhomes constructed along the east side of Sierra Madre Villa Avenue, with parking accessed from the rear? This is not clear. Based on current economics, it is not realistic to expect the development of such structures in this location.

4. Page 41, Section 6.1.1.B: While a range of unit sizes is desirable, we feel that the housing market will best determine if three bedroom dwelling units make economic sense. We recommend deleting this 20% requirement.

5. Page 41, Table 6.1-1: The table should be revised as follows: Max du/ac for MU-1 and MU-2 should be 48; Max FAR for MU-1 and MU-2 should be 2.25; Max. height for MU-1, MU-2, and CRDC should be increased substantially. We understand the need and desire to protect the single family homes along the east side of Sierra Madre Villa. But, height limits of 39' and 45' in this area are just too low, especially when 75' is allowed across the street along the south side of Foothill Boulevard. As mentioned, the Hastings Village site contains approximately 22 acres of land. We hope that with good planning, the density and taller structures may be moved and reallocated on the site to create the best projects.

Because both Hastings Village and Hastings Center sites contain significant elevation differences (lower to the south, and higher to the north), we recommend that the height limits in this area be measured from the mid-point base elevation of each structure rather than the low point of the entire shopping center site.

Section 6.1.2 Height.

We assume that the height limit exceptions for chimneys, roof mounted appurtenances, multi-family structures, and roof-top railings, all remain as approved exceptions under the existing Zoning Code.

Section 6.2 Massing.

Section 6.2.1 Street Setbacks.

1. Page 47, Table 6.2-1: Street setbacks for Sierra Madre Villa Ave/Madre St, under CRDC and MU-1 should be revised to 10'-15'. As stated, these setbacks are measured from the minimum sidewalk line. This area will have 12' minimum sidewalk widths. The requirement for the additional 20' – 30' setbacks beyond the 12' sidewalks, is excessive and confiscatory. While it might be aesthetically pleasing to see a park like setting from the street, this request is just plain too much for private land owners to swallow.

Section 6.2.5 Upper Story Stepbacks.

1. Page 54, Table and Map 6.2-2: The "above height" stepback elevation for MU-1 should be increased. The specified 24' is much too low, especially where ground floor commercial space is required to be a minimum of 15' in height.

Section 6.4 Open Space.

Section 6.4.4 Public Open Space.

1. Page 68, Map 6.4-1: The provision of paseos should be credited against the Public Open Space requirements, and the locations shown on the map should be mere approximations subject to exact siting based on project needs and pedestrian accessibility.

Section 6.5 Access & Parking.

Section 6.5.2 Vehicle Parking.

1. Page 70, Section 6.5.2.B: The requirement to offer unbundled parking is interesting but should be deleted as beyond the proper purview of land use matters.

Mr. David Reyes
January 13, 2021
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Thank you for the opportunity to provide comments and suggestion on the draft EPSP. We would be pleased to supplement our concerns by responding to any questions that you may have.

Very truly yours,

R. Scott Jenkins
of HAHN & HAHN LLP

RSJ:jl

cc: Mr. Ira Smedra
Mr. Chad E. Brown
Mr. Richard Bruckner
Ms. Anita Cerna
Mr. Martin Potter

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