



September 27, 2022

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

Re: Zoning Code Amendments: Planned Development Regulations

Dear Members of the Planning Commission,

Pasadena Heritage would like to thank the Commission for taking up this most important item. The Planning Commission, the Design Commission and Planning Staff have been working diligently on several Planned Developments in the planning pipeline over the last few years. We recognize the amount of time and work put into each one of them. Due to this process, we have also been reminded how problematic they can be and why changes need to be made. We hope you can understand our perspective after watching these projects as we did.

The current crop of Planned Developments contain a range of projects, some with merits and others that are less successful, but they all suffer from one major downside - they take years to be approved and built. Because of this, only the more sophisticated, wealthy developers have the time and resources to navigate this process successfully. In the long run, it is a worthwhile exchange, as it results in a larger, more lucrative project for the proponent. By the same token, the current Planned Development process, by design, excludes smaller, local developers who largely develop on a parcel-by-parcel basis. For this reason alone PDs are flawed. Why should Pasadena grant concessions to large, often out-of-state developers who can accumulate large parcels to the exclusion of smaller Pasadena-based or San Gabriel Valley-based developers?

We are also not convinced that PDs create better urban environments or more sensitive design than would projects just built to current zoning. Places like Old Pasadena or the Playhouse Village are dynamic, compelling urban environments because they are composed of a collection of small, individually unique buildings. Buildings of different styles, ages, and sizes are all placed next to each other on a single block. It is the collection of these parts that form a visually interesting and attractive neighborhood. Though Planned Developments attempt to break up massing with modulation, setbacks, stepbacks, or mid-block paseos, they are often less successful from a design perspective than if the 2+ acres were just developed by multiple different property owners with different architects.



Finally, we point out that many of the issues solved by Planned Developments can be solved using other, more targeted planning tools. The state Density Bonus and Pasadena's Affordable Housing Concession Menu both provide incentives for affordable housing construction. It would be better if additional density were granted specifically in exchange for affordable units.

Historic resources are eligible for generous concessions to allow them to be adapted to changing needs, whether that includes adaptive reuse, additions or a combination of the both. Other preservation incentives such as the Mills Act and the Federal Historic Preservation Tax Incentive are also available to commercial property owners in particular, and should be utilized more often. From Pasadena Heritage's perspective there really is no need to go through a Planned Development process to reuse a historic building, and we often witness historic properties bundled into the 2-acre Planned Development area unnecessarily.

Public open space and superior design are frequently cited as primary reasons to allow Planned Developments. These are important community benefits, but superior design is seldom a driving factor and all new development should be held to the highest design standards. PDs are also not the only way park space can be developed. Just this month, the City of Pasadena cut the ribbon at the new Playhouse Village Park. In Lamanda Park, a pocket park is also under construction. These two parks are funded by residential impact fees, and provide more meaningful public space than most if not all Planned Developments have provided. We would like to see the City continue to develop public parks, plazas and paseos with these fees, rather than rely on private development. The updated Specific Plans additionally include designated areas where publicly-accessible open space is required. We believe that these places can complement the City's investments, but we do not need to rely on Planned Developments to accomplish those goals.

For these reasons, Pasadena Heritage supports eliminating the Planned Development mechanism from the zoning code. Approach 2 would also be an improvement, but it does not address the fundamental issues of the PD process. We would much rather see projects conform to our carefully devised planning documents, which regulate growth and development as Pasadenans would like to see it occur.

Sincerely,

Susan N. Mossman
Executive Director

Andrew Salimian
Preservation Director