

February 14th, 2023

To: Design Review Commission
Pasadena City Hall Council Chambers
100 N. Garfield Avenue
Pasadena, CA 91101

RE: Agenda Item 4.A - 1336-1350 & 1347-1365 E. COLORADO BOULEVARD, 35-39
N. HILL AVENUE & 36-56 N. HOLLISTON AVENUE

Dear Honorable Design Commissioners:

On behalf of the 32,000 members of Unite Here Local 11, we support staff's recommendation for the Design Commission ("**Commission**") to approve the Final Design Review ("**FDR**") for the 49-dwelling unit mixed use project on the South Parcel. However, we oppose granting FDR for the 375-room hotel on the North Parcel because the project is inconsistent with conditions imposed during its Conceptual Design Review ("**CDR**").

First, we are pleased to see that the proposed mixed-use project at South Parcel that includes 49 dwelling units.¹ In November 2019, Local 11 strenuously objected to the then-proposed Conditional Use Permit that would have developed that property as a 150-room hotel in lieu of housing.² We believe these 49 units of desperately needed housing were made possible through the collective efforts of courageous City decision makers, strong public support, and the efforts of Local 11. We ask the Commission to approve the South Parcel's FDR per staff's recommendation.

Second, to grant the FDR, the project design must be consistent with: (a) the purpose of Design Review; (b) adopted design guidelines; and when applicable, (c) consistency with the Secretary of Interior Standards for historic resources.³ Among the purposes and goals of Design Review the preservation and protection of historic resources and addressing Commission conditions imposed during CDR.⁴

Here, as part of CDR Condition 5, the Commission requested a rehabilitation plan for the historic building to be retained that was supposed to be provided for Commission's review during FDR.⁵ The Staff Report confirms the aspects of the rehab plan are currently in progress, which currently does not include *substantial information* describing the rehabilitation work that is to be undertaken.⁶ Despite failing to address Commission Condition 5, staff is recommending to approve the FDR subject to a new Condition 16 that would allow staff to review/approve the rehab plan at a undetermined date in the future.⁷ This subverts the Design Review process and purposes that entrusts the Commission to determine whether CDR conditions have been met during FDR approval.

Instead, FDR should be delayed until the Commission can see and judge the rehab plan. According to the applicant, the rehab plan as well as other major tasks—like the drawings, paint scrapings, and interpretive display—should be completed by November 15, 2023.⁸ The applicant's CDR was approved in June 2022,⁹ which under the Pasadena Municipal Code

¹ See [Staff Report](#), p. 1.

² See [Local 11 Comment Letter](#); see also [BZA Audio](#), hh:mm:ss 2:54:00 – end.

³ See PMC §17.64.K subs. 1 & 2.

⁴ *Ibid.*, at subs. A.8 & F.1.

⁵ See Staff Report, *supra* fn. 1, p. 5.

⁶ *Ibid.*

⁷ *Ibid.*, see also Staff Report, [Attachment A](#), PDF p. 2.

⁸ See Staff Report, [Attachment F-I](#), PDF p. 133.

⁹ See Staff Report, *supra* fn. 1, p. 2)

(“**PMC**”), is valid up to one year or up to two years upon applicant’s request subject to the Director’s approval.¹⁰ Thus, the applicant can request an extension that would give it until June 2024—16 months from now—for it to present the Commission its historic rehab plan.

Third, we ask the City to confirm appeal deadlines and logistics applicable to the requested FDR. It seems that FDRs granted by the Commission may be appealed by any person to the City Council within 11 days after the decision is made.¹¹ However, it is unclear if that decision will be made effective at the close of tonight’s hearing or via a subsequent written notice,¹² or applicable appeal forms and fees,¹³ or accommodations for potential appellants who are unable to submit an appeal in person.¹⁴

In closing, we are happy to see housing on the south parcel and ask the Commission to approve the Final Design Review. However, for the North Parcel, the rehab plan is not complete and, thus, the Commission cannot make the Code-required findings. The Commission, not staff, should review those plans and ensure historic resources are preserved and protected. The applicant can is entirely in control of how quickly that plan is prepared, which by applicant’s own estimates should be ready by the end of 2023—well before the June 2024 deadline if its requests an extension of the Conceptual Design Review approved in June 2024.

¹⁰ See PMC §§ 17.61.030.E.4, 17.64.040.A.3, 17.64.040.C.4.

¹¹ See PMC §§ 17.61.030.F.4, 17.64.020, 17.72.020.D, 17.72.030.

¹² See PMC § 17.61.I.3.

¹³ See PMC § 17.72.050.A.

¹⁴ See PMC § 17.72.050.A.1.c.