

**LINDA VISTA-ANNANDALE ASSOCIATION**

**PASADENA, CA 91109**

October 23, 2020

Re: City Council Meeting October 26, 2020; Agenda Item 14.  
Predevelopment Plan Review (PPR) – St. Katherine’s Canyon

Mayor Tornek and Councilmembers:

Although a PPR presentation to the Council is not a public hearing, the Linda Vista-Annandale Association (LVAA) appreciates the opportunity to comment on the PPR for St. Katherine’s canyon. LVAA has a long history of concern and attention to proposed development of the many canyons in our neighborhood area that we value for open space and parkland, for example, Annandale Canyon which is now a public park, and, in some cases, for appropriate development.

1. Environmental Impact Report (EIR); Constraints analysis. St. Katherine’s Canyon is a highly environmentally sensitive, very steep, hillside canyon. As stated on Page 9 of the PPR: “*The site topography is steep, and the open hillside is visible from Inverness Drive and Edgehill Place on the south within the City of Pasadena*”. Full environmental review pursuant to the California Environmental Quality Act (CEQA) of this proposed project is of great importance to LVAA. Section 26 of the PPR on page 28 states that the proposed project will be subject to CEQA, and that the project “would likely” require an EIR.

In LVAA’s opinion, an Environmental Impact Report must be required for the proposed project. We commend and support Staff’s comments in this Section, and support preparation of an EIR for the proposed project.

Land Use Element of the General Plan. In the EIR context, and in the context of determining General Plan Consistency for any entitlement purpose, we agree with Staff that all the following General Plan Land Use Element Policies deserve further consideration by the Applicant: Policy 10.9 (protection of Natural Open Space); Policy 10.14 (utilization of Native Plants); Policy 10.15 (Open Space Connectivity – maintain/restore wildlife corridors and habitat linkages); Policy 21.9 (Hillside Housing – maintain appropriate scale, massing); and Policy 22.1 (Appropriate Scale and Massing)

– discourage mansionization by requiring compatible development). In analyzing the proposed project, all these Land Use Policies should be fully considered and applied to determine General Plan Consistency.

Native Plants. The Staff comment under Land Use Element Policy 10.14 (Native Plants) states: “*The applicant should work with Zoning staff . . . {to} ensure that all new landscaping resulting from the project is also composed of native, and drought-tolerant, plant species*”. We commend and support Staff’s comments on this issue.

Constraints Analysis: e.g. Biological Assessment. The Hillside Development Application for each lot is required to include a Biological Assessment. As stated in the PPR on page 24: “*The analysis should evaluate whether the site has potentially sensitive environmental resources including endangered plant or animals, trees protected by the City’s Tree Protection Ordinance, riparian areas, or a wildlife corridor. If any exist, the study shall include identification and analysis of the resources, and proposed mitigation measures for effective protection in compliance with the California Environmental Quality Act (CEQA).*” Further, on Page 6 of the PPR, staff states: “*The project site may potentially be contributing to a regional wildlife movement/live-in habitat corridor and linkage complex, which includes the San Rafael Hills. The applicant is encouraged to work with Zoning staff to ensure that the proposed development and construction activities would not impact any wildlife movement and connectivity in the environmental region.*” We commend and support Staff’s comments on these issues.

Open Space and Conservation Element of the General Plan. The PPR on Page 6 in the context of Policy 10.9 (Natural Open Space) of the Land Use of the General Plan states: “*The applicant is also encouraged to be familiar with the Open Space and Conservation Elements (sic) of the General Plan*”. The Open Space and Conservation Element of the General Plan provides a blueprint for natural open space and conservation. The Element is guided by the following vision statement which informs the goals, objectives, and implementation measures: *Pasadena treasures, protects, restores, and expands its natural open space and exemplifies innovative and effective natural resource stewardship and conservation.*

The first Goal of the Open Space and Conservation Element is to: Preserve, Acquire and Create Open Space. The first Objective under this Goal is to:

- Preserve currently zoned open spaces, natural open spaces, hillsides, viewsheds, watersheds and recreational areas.

The second Goal of the Open space and Conservation Element is to: Develop Access & Connectivity for Wildlife and People. The first Objective under this Goal is to:

- Develop open space and wildlife corridors and establish easement and acquisition programs.

In the EIR context, and in the context of determining General Plan Consistency for any entitlement purpose, LVAA's position is that full review and consideration of Pasadena's Open Space and Conservation Element of the General Plan should be required to determine General Plan consistency. We commend and support Staff's comments on this Element, calling the Applicant's attention to the matters addressed in this Element.

Canyon Wildlife Corridor. LVAA is aware that this canyon encompasses an important wildlife corridor, as well as flyways for migrating birds, and nesting and other benefits for local birds. It is a portion of a regional corridor and an on-going enhancement project to assure passage through the San Rafael Hills and Verdugo Mountains, linking both to the San Gabriel Mountains, known as the Hahamongna to Tujunga Wildlife Corridor (HTC). The long-term biodiversity of this site, of the San Rafael Hills and of the Verdugo Mountains will be reliant on a fully functioning HTC. The Project analysis: must include a full analysis of all wildlife species that are found in the canyon and that are expected to frequent the canyon with enhancement of the HTC; should consider the service of this site and its habitat to the HTC and to regional biodiversity; should be prepared by highly qualified consultant(s), including engaging with the California Department of Fish and Wildlife; and, should be considered as part of the Hillside Development Permit Application for each lot, and adapted for each lot if the analysis is different for any lot, particularly as to proposed mitigation measures.

Preservation of Remaining Open Space. Although not a direct concern of the PPR, LVAA supports preservation in perpetuity of the remaining Open Space, or the entire canyon if this proposed project does not go forward, and looks forward to working with Staff, neighbors, and interested conservation non-profits to accomplish this goal.

2. Requirement for Connection to a Public Sewer. LVAA's long-standing position is that no development should take place in our hillside areas, including canyon subdivisions, unless the project connects to a public sewer.

Various Sections of the PPR, including the Public Works Department comment on Page 35 of the PPR, require that the project shall connect to the public sewer and that the applicant improve the public sewer. We commend and support Staff's comments on this issue.

3. Deficiency in PPR: NO Topographic Map or Slope Analysis; Hillside Development Impacts. Section 10 of the PPR on Page 15 states that the "Preliminary plans do not

include a survey or slope analysis". No accurate, complete, and fully informative PPR as to the applicability of the Hillside Overlay District rules can be prepared and reviewed without a Topographic Map and Slope Analysis of the canyon and each proposed lot. Staff erred in not requiring such a Topographic Map and Slope Analysis. This is a serious deficiency which inhibits review by adjacent neighbors and LVAA.

For example, Subsection 5 on Page 9 of the PPR (General Site Planning Standards) states that: *"Each structure shall be located in the most accessible, least visually prominent, most geologically stable portion or portions of the site, and at the lowest feasible elevation. Structures shall also be aligned with the natural contours of the site. Siting structures in the least prominent locations is especially important on open hillsides where the high visibility of construction should be minimized by placing structures so that they will be screened by existing vegetation, depressions in topography, or other natural features"*. None of these matters can be considered and understood without a Topographic Map and Slope Analysis of this steep canyon and the proposed lots.

Other Hillside Overlay and other, related, requirements that cannot be considered and understood without a Topographic Map and Slope Analysis of the steep canyon and the proposed lots include: lot size and location within the canyon; Grading, i.e. how much and where; Soils Engineering Report; Drainage, and Erosion control; Placement of Structures/Ridgeline Protection; Maximum Gross Floor Area for Each Proposed Lot; Lot Coverage; Neighborhood Compatibility; Height Limits; Accessory Structures; Mechanical Equipment; Paving; Architectural Features; and View Protection; and Visual Analysis.

View Protection and Visual analysis. As stated above, the subject steep, open canyon hillside is visible from Inverness Dr. and Edgehill Place to the south. The proposed houses are each two stories in height, and it appears that the applicant intends to build all three houses to the maximum height permitted by applicable rules. A Topographic Map and Slope Analysis is essential to consider View Protection under the Hillside Development Overlay, and to determine the best siting of the houses as well as the visual impacts of the proposed project on neighbors, particularly Inverness Dr. and Edgehill Place neighbors to the south. The PPR on page 22 asserts that views from surrounding properties would not be affected by the project. LVAA disagrees with this assertion on the basis that insufficient slope information is included in the PPR to reach this conclusion, particularly since with more complete slope information, the lots and the houses may have to be "relocated" from the locations currently proposed.

4. Fire Hydrant(s); Fire Apparatus Access Road. Sections 2,3, and 5 on Page 28 of the PPR note that the project is located in an Extreme Fire severity Zone; that a Fire Hydrant or Hydrants shall be located within 600 feet of all exterior portions of the proposed structures; and, a fully compliant Fire apparatus access road is required as part of the proposed project.

LVAA commends and supports Staff's comments on these fire-related issues, particularly the Fire hydrant requirement.

5. Construction Staging and Traffic Management Plan. LVAA notes that this required Plan, in our experience, is rarely followed by developers, applicants, contractors, or subcontractors, and is rarely enforced by the City except in response to many specific complaints. Impacted neighbors, particularly adjacent or nearby neighbors on narrow, hillside streets, suffer over long periods of time from construction staging and construction traffic in the hillsides, particularly from projects that start "on time" but then, seem never to end. A good example is a project nearby on Edgehill where the Construction Staging and Traffic Management Plan was regularly ignored and was almost useless over a long period of time.

LVAA suggests the following to improve administration of this Plan: a neighbors/community meeting in person or virtually to review the Plan and take comments and suggestions; information on where and how the Plan for this proposed project can be reviewed by the public; and, detailed additions and revisions to the Plan to provide real enforcement mechanisms that neighbors and LVAA can rely on when construction staging and traffic problems arise. The Plan template does provide for contact information for on-site persons in charge, but no information is provided on making complaints and on City enforcement procedures, including management of the cumulative impacts of nearby separate construction projects that impact steep hillside areas and narrow hillside streets. Attention also should be given at the community meeting or otherwise to a fair division of construction staging and construction traffic access off of Inverness versus the proposed Private Street off of Saint Katherine Drive to avoid one group of neighbors having to experience all the construction traffic impacts.

6. Public Improvements Along Inverness Drive; Street Lights. The PPR on page 35, subsection d., states that: "*The existing street lighting system along Inverness Drive does not meet present design standards*", and then continues to require that the developer shall design and install seven new street lights on the frontage of the property on Inverness.

LVAA strongly objects to any new, or ongoing, street lighting program on Inverness that removes or otherwise continues to adversely impact the historic street lighting in this part of the LVAA neighborhood area that is an essential part of the character and scale of the neighborhood. Many times, LVAA has indicated to Public Works that all street lighting changes and upgrades must acknowledge and preserve the various Linda Vista-Annandale historic street lighting throughout our neighborhood area, including the lighting on Inverness and adjacent streets. LVAA requests that Public Works consult with LVAA and concerned neighbors before implementing any new street lighting program on Inverness in connection with the proposed project.

Thank you for your consideration of our comments and concerns.

Sincerely,

*/s/ Nina Chomsky*

Nina Chomsky,  
President, LVAA

cc: LVAA Board of Directors

**Comments on the proposed development, Saint Katherine's properties, Linda Vista Hills**

My name is Michael Long and I am a Field Biologist and retired Administrator of Los Angeles County's Natural Areas Division, Department of Parks and Recreation. I am concerned that the proposed development of three large homes in the last open space drainage in the Linda Vista Hills, as seen from aerial images, will impact this already narrowly-constricted open space. The Pasadena Land Use Element Policies 10.9 through 10.15 clearly state the problems with developing approximately 14 acres of wildland open space supporting native trees, shrubs and annual plants. This Cottonwood Canyon connects from Arroyo Seco westward through the San Rafael Hills, thus is contributing to open space connectivity and a regional wildlife movement corridor.

Additional runoff of fertilizers, pesticides, petroleum products, soaps and potential erosion discharged could impact the water quality and wildlife habitat in the Cottonwood Canyon below, including the Arroyos & Foothills preserve just downstream, with a year-round creek fed by a spring.

The best way to insure that Cottonwood Canyon remains an open space wildlife corridor and preserve the visual relief it provides to Pasadena residents is to preserve these parcels in their current state.

Thank you for the opportunity for comment.

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**Item 14**