

December 11, 2020

Pasadena City Council  
City of Pasadena  
100 North Garfield Avenue  
Pasadena, California 91101

CITY CLERK  
CITY OF PASADENA

2020 DEC 11 PM 3:43

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RE: Historic Preservation Ordinance Amendments - Support with Amendments

Dear Honorable Mayor and Members of the City Council:

Pasadena Heritage is pleased that you will be considering amendments to the Historic Preservation Ordinance this evening. Pasadena prides itself in its dedication to historic preservation. Our historic resources are assets that attract residents, businesses, and visitors to our city. Pasadena has a relatively strong preservation program, with dedicated staff members, an Historic Preservation Commission (HPC) that meets regularly, dedicated neighbors and activists, and a very active non-profit organization dedicated to the protection of the built environment.

In the last decade however, there have been multiple projects across the City that have angered and upset Pasadenans. Historic homes have been stripped of all character, demolished, or changed beyond recognition. It has become clear that there are some major deficiencies in the Historic Preservation Ordinance that must be addressed in order to prevent further destruction. We very much appreciate the Council's direction to staff to address these concerns and these resulting amendments to the Historic Preservation Ordinance.

Pasadena Heritage supports Staff's recommendations with one specific requested change, which we believe will further strengthen the definition of Major Projects. We ask that definition (f) of a Major Project be amended to read:

*Substantial removal or replacement (more than 25%) of exterior cladding on a primary or street-facing elevation OR substantial removal or replacement (more than 50%) of all exterior cladding.*

We have seen several projects that removed historic exteriors without a meeting at the Historic Preservation Commission. The proposed amendment would ensure that a majority of the house cannot be replaced with only staff-level only, and protect more than just the primary façade. It would also allow neighbors the chance to review projects that will re clad a home in their neighborhood, and to share their input. To be clear, removal or replacement could still occur if approved by the HPC.

We also ask the Council to request two provisions to increase transparency going forward:

- 1) that Design and Historic Preservation staff return to the City Council in one year to report on effectiveness of changes and recommend any adjustments.
- 2) that City Planning staff host a public meeting in early 2021 to explain the newly implemented Mansionization Ordinance and these Historic Preservation Ordinance revisions for interested community members. Pasadena Heritage would be pleased to help with such a meeting and certainly broadcast and encourage community attendance.

We thank the City Staff for their hard work in crafting these amendments, and the City Council for your continued support of historic preservation.

Sincerely yours,



Susan N. Mossman  
Executive Director



Andrew Salimian  
Preservation Director

cc: David Reyes, Director of Planning  
Kevin Johnson, Senior Planner



BUNGALOW HEAVEN™ NEIGHBORHOOD ASSOCIATION

Pasadena City Council  
City of Pasadena  
100 North Garfield Avenue  
Pasadena, CA 91101

December 12, 2020

RECEIVED

2020 DEC 14 PM 9:05

Dear Honorable Mayor and Members of the City Council:

The Bungalow Heaven Neighborhood Association (BHNA) has participated in the ongoing process of revising the Historic Preservation Ordinance (HPO). We thank the Council for directing staff to undertake the project.

While we feel that the results could potentially be further optimized in a few areas, at this point we support Staff's recommendations with one specific requested change to one item. This item is the **Criteria for amending conservation plans (17.62.070 H. 1; staff report item 6, pages 9-11).**



The staff report recommends four criteria for amending existing district conservation plans. We urgently ask that the criteria list (third set of bullets on page 10) be amended to delete the second criterion. This particular criterion in effect prohibits future conservation plan amendments from creating or extending any inconsistencies with the basic HPO.

We emphatically disagree with the second criterion. While absolute consistency between existing conservation plans and the HPO might be a laudable goal, the primary consideration should be the ability of neighborhoods to differ from details of the HPO *when those differences meet the other three suggested criteria.*

Imposing the other three criteria ensures that plan amendments are not in conflict with the intent of city ordinances, yet at the same time allows neighborhoods with conservation plans to tailor requirements to their district.

Staff discusses their opposition to deleting this criterion on page 11. They assert that consistency overrides all other considerations. They go on to say that if a need for an inconsistency is found for one landmark district, then the same need should apply to all other districts from day one.

In our opinion, this idea of total uniformity *at all times* prevents a district from trying variations that could *eventually* be shown by experience to be good for all districts. The Staff approach thus would block organic growth of preservation practices at a grass-roots level within our city. This would be detrimental to the city's historic resources and best interests.

The Bungalow Heaven Board of Directors appreciates the opportunity to continue BHNA's participation in the HPO update process. We sincerely ask that the Council adopt our recommendation, and we request that this letter be entered into the public record for the City Council hearing.

Sincerely,

Bryan Reese  
President, Bungalow Heaven Neighborhood Association

12/14/2020  
Item 27

## Martinez, Ruben

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**From:** Steve Preston <[REDACTED]>  
**Sent:** Saturday, December 12, 2020 10:02 PM  
**To:** PublicComment-AutoResponse  
**Cc:** Sue Mossman; 'Andrew Salimian'; 'Lynn KOLBERG'  
**Subject:** AGENDA ITEM 27 - DRAFT HISTORIC PRESERVATION ORDINANCE AMENDMENTS

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December 12, 2020

**Honorable Mayor Victor Gordo**  
**Members of the City Council**  
City of Pasadena  
100 North Garfield Avenue  
Pasadena, CA 91101

**SUBJECT: AGENDA ITEM 27 – PUBLIC HEARING – DRAFT REVISIONS TO THE HISTORIC PRESERVATION ORDINANCE**

Mayor Gordo and Members of the Council:

We are residents of the Garfield Heights neighborhood and owners of a locally designated landmark/Mills Act property. We would like to compliment the staff in Planning and Historic Preservation, as well as the Planning and Historic Preservation Commissions, on the outstanding effort that has been taken to update the City's historic preservation ordinance.

We fully support the proposed ordinance amendments as recommended by staff, including those revisions suggested by the Historic Preservation Commission that have been recommended in the staff report.

**As members of Pasadena Heritage, we also support the recommendations being offered by Pasadena Heritage with respect to (1) stronger protections against incompatible exterior alterations and (2) educational programs to help educate and inform the community about these changes. We do hope that the Council will incorporate these recommendations into the final ordinance.**

The unique character and history of Pasadena is a unifying feature that sets it apart from other Southern California communities. The revised historic preservation ordinance is yet another step toward fulfilling the City's vision, and we urge the Council to adopt it with the noted revisions.

Thank you for considering this request.

Very truly yours,

**Steven A. Preston and Janet Whaley**  
1143 North Los Robles Avenue  
Pasadena, CA 91104-3558  
[steve.preston@charter.net](mailto:steve.preston@charter.net)

12/14/2020  
Item 27

[janet1860@charter.net](mailto:janet1860@charter.net)

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**Julianna Delgado, M.Arch, PhD, AICP**

2020 DEC 14 AM 9: 07

Home Address: 982 North Mentor Avenue, Pasadena, CA 91104-3818 USA

Home Telephone and Voicemail: (626) 797-7716 • e-mail: julianna.delgado@sbcglobal.net

PLANNING  
COMMISSION

December 12, 2020

City of Pasadena City Council

RE: December 14<sup>th</sup> Agenda Item #27 -- Historic Preservation Ordinance Amendments

Honorable Mayor and Members of the City Council:

Staff has provided considerable and commendable effort in amending the City's Historic Preservation Ordinance ("HPO"). I substantially support its recommendations except on two counts: preventing mansionization of non-contributing ("NC") structures; and the proposed findings for amending a Conservation Plan ("CP").

### **I. Protection Against Mansionization of Non-Contributors**

Per page 6 of the Agenda Report, Staff proposes to revise the HPO's list of major and minor projects. Revisions c. through f. could be applied to the demolition or substantive reconstruction of NCs in landmark districts. However, there is no clear discussion of preventing mansionization in the amended HPO given that overlay districts are now exempt from the provisions of the newly-adopted Mansionization Ordinance ("MO").

### **DISCUSSION**

During the Planning Commission's recent deliberations on mansionization, an objection was raised that overlay districts should not be exempt from the MO's provisions because the HPO does not adequately prevent mansionization of NCs in historic districts. Thus, it was argued that the MO should be applied Citywide. Although Director Reyes initially agreed, the recommendation was dropped as the forthcoming amendments to the HPO were assured to include protections. However, there is no clear discussion in the Report.

The issue was raised following the 'remodeling' of a modest home at 1167 N. Catalina in Bungalow Heaven, a NC resulting from remodeling prior to the district's creation. While the structure could have been restored to become a contributor, it was essentially demolished without a permit to be replaced with a new, two-story 4,000 sf Craftsman-style home, clearly out of scale with the neighboring homes averaging about 1,800 sf. Despite a Conservation Plan ("CP") and the HPO, the result is no protection against mansionization of NCs.



Mansionization in Bungalow Heaven: House on right (before) (During construction today and out of scale with neighborhood)

## II. Findings to Amend Conservation Plans

I support the Bungalow Heaven Neighborhood Association's objection to the second of the four findings Staff has proposed for amending a CP, provided on page 10 of the Agenda Report. Finding #2 should be stricken so the list reads as follows with a proposed addendum (underlined below) inserted:

- The proposed amendments are consistent with the purposes of the Historic Preservation Ordinance; and
- ~~The proposed amendments would not create further inconsistencies between the Conservation Plan and the Historic Preservation Ordinance; and~~
- The proposed amendments are in conformance with the goals, policies, and objectives of the General Plan; and
- The proposed amendments would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

In the event of a conflict between substantive provisions in an adopted Conservation Plan and those in the HPO, the Conservation Plan shall prevail. For general procedural provisions and those on which the Conservation Plan is silent the HPO shall prevail.

### DISCUSSION

Three of the proposed findings—the first, third, and fourth—are sufficient to ensure consistency with the intent of the HPO, the City's General Plan, and its ability to ensure its police powers, as with the amending of any other regulatory document.

However, Finding #2, which would rely on Staff's interpretation, should be stricken. It would only serve to prohibit any new substantive amendment to a CP if interpreted as creating "any further inconsistency," particularly provisions related to quantifiable standards (i.e. whether replacing a front door is subject to review) and stifle problem-solving. Finding #2 would essentially eliminate the power to amend a CP should it be warranted to protect the unique character of the district and its historic resources, especially should the substantive provisions of the HPO be inappropriate or ineffective for that district (i.e. interpreting that front yard landscaping, which is temporary, that obscures a façade and reduces the view of character-defining features 'from the public right of way,' which invites long term alterations that may not be appropriate in all districts). Approving Finding #2 could eliminate any future safeguards that Staff interprets as 'inconsistent' proposed by property owners as a result of unforeseen or changes in circumstances. Striking instead Finding #2 would allow amendments to the CP that are more restrictive, hence more protective and tailored to the unique historic character of the properties within a defined district than the generalized provisions of the HPO, which apply Citywide.

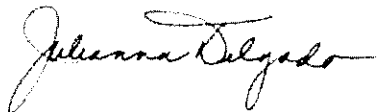
My proposed addendum regarding favoring the CPs provisions--which Staff also recommends—should be added here for the sake of transparency. It is consistent with PMC Chapter 17.62.030- General Procedures- A. Review of Applications for Certificates of Appropriateness, Section 8, which states:

*In the event of a conflict between an adopted conservation plan and the procedures of this chapter, the conservation plan shall prevail.*

The Bungalow Heaven Conservation Plan ("BHCP"), adopted in 1989 and amended by Staff-initiation in 1993, is the City's first of only three CPs in Pasadena and served as the basis for the City's current HPO. The BHCP remains in effect to ensure longstanding protection of the unique qualities of the district but has been difficult to amend by public initiation because of Staff's interpretation that it be by petition of a majority of property owners. Thus, inconsistencies have grown. Gratefully, Staff now recommends replacing the onerous procedure with a property-owner noticing and public hearing process. As a result, the BHCP may be amended more easily in the future to align more closely with the HPO's provisions and reduce inconsistencies among the two documents.

In closing, we should not lose sight of why CPs were created in the first place and their role in protecting precious resources while supporting public participation. Thus, I urge you to consider the BHNA's objection. I urge you as well to direct Staff to add to the HPO amendments clear protections from mansionization of NCs in historic districts. Finally, I urge your support of Pasadena Heritage's recommendations, particularly the need to inform the community about both the Mansionization Ordinance and amendments to the HPO.

Respectfully yours,



Julianna Delgado, MArch, PhD, AICP  
Bungalow Heaven Resident and Property Owner

President, Southern California Planning Congress  
Professor Emerita, Dept. of Urban and Regional Planning, Cal Poly Pomona  
Past President (three terms), Bungalow Heaven Neighborhood Association  
Past Bungalow Heaven Representative, Historic Preservation Commission  
Co-Author with John G. Ripley, *Pasadena's Bungalow Heaven*



**Martinez, Ruben**

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**From:** lorraine montgomery n>  
**Sent:** Sunday, December 13, 2020 1:50 PM  
**To:** PublicComment-AutoResponse  
**Subject:** Historic Preservation Ordinance Amendments-Support with Amendments

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December 11, 2020  
Pasadena City Council  
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California 91101

RE:Historic Preservation Ordinance Amendments-Support with Amendments

Dear Honorable Mayor and Members of the City Council:

As a member of Pasadena Heritage support Staff's recommendations with one specific requested change, which we believe will further strengthen the definition of Major Projects. We ask that definition (f) of a Major Project be amended to read:Substantial removal or replacement (more than 25%) of exterior cladding on a primary or street-facing elevation OR substantial removal or replacement (more than 50%) of all exterior cladding.

We also ask the Council to request two provisions to increase transparency going forward: 1) that Design and Historic Preservation staff return to the City Council in one year to report on effectiveness of changes and recommend any adjustments.

2) that City Planning staff host a public meeting in early 2021 to explain the newly implemented Mansionization Ordinance and these Historic Preservation Ordinance revisions for interested community members. Pasadena Heritage would be pleased to help with such a meeting and certainly broadcast and encourage community attendance. We thank the City Staff for their hard work in crafting these amendments, and the City Council for your continued support of historic preservation.

Regards,  
Lorraine Montgomery