

RECEIVED

2023 FEB 27 AM 9:35

CITY CLERK  
CITY OF PASADENA



February 25, 2023

**VIA EMAIL**

[correspondence@cityofpasadena.net](mailto:correspondence@cityofpasadena.net)

To Mayor Gordo and City Councilmembers:

**RE: VOTE NO TO ABOLISH PLANNED DEVELOPMENTS ENTIRELY (2/27/2023 ITEM #9)**

The WPRA asks the City Council to abolish Planned Developments ("PDs") entirely and confirm the unanimous vote of the Planning Commission, while encouraging judicious use of the available planning exceptions.

Since their inception in Pasadena in 1977, over 40 PDs have been submitted and designed, many of which have provided benefits to both developers and the city. Developers save time, benefit from an easier approval process, and gain flexibility for size and design. In return, the city has a better fit into the area's design context, enhanced amenities, and open space (either residential or commercial), and superior design and quality of materials.

However, this was all prior to the recent multiplicity of state planning and land-use mandates, which override the appropriate and necessary oversight management by the city's Planning and Community Development staff. Due to a spate of recent state legislation and regulations, local oversight has become much more difficult, and in some instances prohibited, while the use of PDs has become more prevalent. PDs have become a tool used by developers to maximize density and circumvent city zoning requirements and guidelines, negatively affecting neighborhoods, trees, mobility, and open space.

We already have a carefully crafted General Plan, eight Specific plans, and Zoning laws—all developed over the years with outreach and robust citizen participation. These tools are explicit, practical, and efficacious.

We are now confronted with an array of new housing incentives and state zoning mandates that have changed the equation of urban planning. Consequently, Planned Developments no longer are an effective development tool, and in fact serve to undermine the City's ability to provide systematic and reasonable development oversight.

We respectfully ask the Council to uphold the Planning Commission's recommendation to terminate all Planned Developments.

WEST PASADENA RESIDENTS' ASSOCIATION  
POST OFFICE BOX 50252 – PASADENA, CA 91115

Serving our neighborhood since 1962

2/27/2023  
Item 9

Thank you for your careful consideration of our request,

A handwritten signature in cursive script, appearing to read "Pete Ewing".

Pete Ewing,  
Chair, Land Use and Planning  
For the WPRA Board of Directors



**PASADENA  
HERITAGE**  
PRESERVATION | ADVOCACY | EDUCATION

160 NORTH OAKLAND AVENUE  
PASADENA, CALIFORNIA 91101-1714

P 626.441.6333  
WWW.PASADENAHERITAGE.ORG

RECEIVED

2023 FEB 27 AM 9:35

ON FILE  
CITY OF PASADENA

February 24, 2023

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

**Re: Zoning Code Amendment: Planned Development Regulations**

Dear Honorable Mayor and Members of the City Council,

Pasadena Heritage supports Planning Staff's recommendation to eliminate Planned Developments from the zoning code. While we remember the good intentions of the original creation of the PD concept, in recent years, we have come to the conclusion that this provision in the code has outlived its useful life due to the way various state laws are implemented and, in particular, the State Density Bonus Law (SDBL). We have seen multiple proposed Planned Developments attempt to stack the Planned Development regulations with the SDBL, creating larger projects than the planning process would normally allow while providing less affordable housing. This practice has become so common that the Planning Commission coined the term "double-dipping." We find that the SDBL and Pasadena's Concession Menu can be powerful tools for creating mixed-income housing, and are much more effective than the PD process.

Recent planning efforts have also made zoning in Pasadena more flexible: draft Specific Plans allow more mixed-use in more parts of the City, the updated Historic Preservation Ordinance provides greater incentives for sites with historic properties, the updated Single-Room Occupancy (SRO) Ordinance allows efficiency units in more areas, and Transit Oriented Development (TOD) standards allow for meaningful parking reductions near transit. Recent state laws, such as AB-2011 and AB-2097, further enhance some of these efforts. In light of these changes, the Planned Development regulation seems antiquated and unnecessary.

The Planning Commission spent hours debating these changes. We participated regularly and we find that the Commission has come to the correct decision, voting unanimously to recommend elimination of Planned Developments. We strongly agree with the conclusion that Pasadena should be a well-planned city and that developers should follow our carefully designed regulations. Allowing developers to write their own rules goes against the countless hours of community engagement, staff time and Commission processes that seek to create a better, more livable City. We urge you to support this recommendation.

Sincerely,

Susan N. Mossman  
Executive Director

Andrew Salimian  
Preservation Director

PRESERVATION | ADVOCACY | EDUCATION

2/27/2023  
Item 9



**Linda Vista-Annandale Association  
Pasadena, CA**

RECEIVED  
2023 FEB 27 AM 9:35  
CITY CLERK  
CITY OF PASADENA

February 24, 2023

Re: City Council Meeting 2/27/2023; Agenda Item 9; Elimination of Planned Developments (PDs).

Mayor Gordo and Councilmembers,

The Board of Directors of the Linda Vista-Annandale Association (LVAA) supports the Planning Commission and the Staff Recommendation to eliminate PDs in Pasadena.

LVAA's strongly held opinion is that PDs need to be abolished. They encourage and invite the clearance of large land areas, thereby resulting in the destruction of character-defining existing buildings and businesses/services – reminiscent of the worse aspects of Redevelopment. The impacts of PDs are deleterious and lead to land clearance because Pasadena generally is a built-out City. The general built-out nature of the City means that there is a recognizable and appreciated block face "rhythm" throughout the City's commercial and downtown areas that is destroyed by large areas of land clearance, thus resulting in permanent alterations to Pasadena's scale and character. Further, because of the large areas involved and the costs of land assemblage, the resulting development usually and typically is out of scale and out of character with what was "there", and what is currently around the new PD development.

However, even when a PD is proposed without much land clearance, as was the case with a recently proposed PD adjacent to Villa Parke, it was clear to many of us that because that proposed development was so large, adjacent areas would "fall" next – the predictable "domino" effect of PDs, particularly in the context of rising land values. In the case of that proposed PD, the area in danger was the historic Villa Parke neighborhood and other adjacent small scale and historic neighborhoods.

The ability of PD developers to design and create, and have adopted, their own zoning and design rules further encourages and invites poor development. Whatever protections are included in underlying zoning and design standards and guidelines, in effect, are swept away with the false idea that, somehow, the developer-designed new zoning and design rules are "better" and "improved" because staff and decision-makers can "review" these new rules without extensive public participation. In fact, "make up your own" rules usually result in developer-driven rules and process – planning by Project rather than planning by codes, rules, standards, and guidelines adopted through extensive public participation and process and then applied without bias to various project proposals. Further, if staff and decision-makers do not pay close attention, the more dominance the developer can exert over the PD process. PDs undermine public confidence and participation in the planning process.

LVAA urges you to accept the recommendations of both the Planning Commission and the Staff and abolish PDs.

Thank you for your attention to our comments and concerns.

Sincerely,

*Nina Chomsky*

Nina Chomsky, LVAA President

cc: LVAA Board of Directors

## McMillan, Acquanette (Netta)

---

**From:** Jomsky, Mark  
**Sent:** Friday, February 24, 2023 12:33 PM  
**To:** Official Records - City Clerk  
**Subject:** Fwd: Feb. 27 City Council Agenda Item

[Get Outlook for iOS](#)

---

**From:** Richard McDonald  
**Sent:** Friday, February 24, 2023 9:59:35 AM  
**To:** Jomsky, Mark <mjomsky@cityofpasadena.net>  
**Subject:** Feb. 27 City Council Agenda Item

You don't often get email from

[. Learn why this is important](#)

**[⚠] CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you **know** the content is safe. Report phish using the Phish Alert Button. [Learn more...](#)

Mark – Please provide the attached comment to the Mayor and City Council. Thank you.

Dear Mayor Gordo and Honorable Members of the City Council:

Item No. 9 on your Agenda for Monday night is a proposed zoning code amendment for planned developments wherein staff is no longer recommending expanded findings, development agreements, and other changes to the existing PD regulations; but rather, presenting the Planning Commission recommendation to eliminate them altogether. Unfortunately, I have another meeting Monday night and cannot attend to comment on it in person.

Having been involved with at least seven of the existing PDs in one way or another over the years, however, I wanted to share a private sector perspective. Specifically, I would recommend against eliminating them altogether because they are a useful planning tool for large lots where many of the “checklist” development standards are clumsy and not supportive of architectural excellence. Relying on variances as suggested in your staff report also is often not legally feasible and only applies to development standards, not specific alternative land-uses.

That said, I would recommend a simpler alternative, i.e., simply increase the size requirement for a PD. Under 17.26, only sites of 2 acres or more are eligible for PDs. I would recommend you raise that to five acres, which will reduce the use of them, particularly near residential neighborhoods of smaller sizes.

Last, in the interest of full disclosure, I represent the owner of the St. Luke’s property and we are working on a PD for a life sciences campus because the current zoning is PS and we otherwise would need a General Plan amendment, which is far more cumbersome and permits far more uses than the neighborhood would like. With a PD, the City Council can limit the use to life sciences, which is a great opportunity for the City.

Thank you for your consideration.

2/27/2023  
Item 9

Richard A. McDonald, Esq.  
Law Office of Richard A. McDonald  
Of Counsel, Stoner / Carlson, LLP  
301 E. Colorado Blvd., Suite 320  
Pasadena, CA 91101  
Office Telephone: (626) 356 - 4801  
Cell Telephone: (626) 487 - 6713

Email: [RMcDonald@StonerCarlson.com](mailto:RMcDonald@StonerCarlson.com)

Website: [www.CarlsonNicholas.com](http://www.CarlsonNicholas.com)