

**PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT****MEMORANDUM**

DATE: JULY 10, 2024

TO: PLANNING COMMISSION

FROM: JENNIFER PAIGE, DIRECTOR OF PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

SUBJECT: ZONING CODE AMENDMENTS RELATED TO ADAPTIVE REUSE OF EXISTING NONRESIDENTIAL BUILDINGS, INCLUDING CHANGES RELATED TO SHARED PARKING AND VARIANCES FOR HISTORIC RESOURCES

RECOMMENDATION:

It is recommended that the Planning Commission:

1. **Recommend** that the City Council find that the Addendum to the 2015 Pasadena General Plan Environmental Impact Report (State Clearinghouse No. 2013091009) to address the potential environmental impacts associated with the proposed amendments have been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA) (Cal. Public Resources Code Section 21000, et. seq., as amended) and its implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq., 2016). This Addendum has been prepared and will be processed consistent with CEQA Guidelines (Cal. Code Regs., Title 14, Sections 15162 and 15164). The addendum found that the proposed amendments will not result in any potentially significant impacts that were not already analyzed;
2. **Recommend** that the City Council adopt the Findings for the Zoning Code Amendments in Attachment A; and
3. **Recommend** that the City Council approve the Zoning Code Amendments as outlined in this report.

BACKGROUND:

Adaptive reuse is the process of converting an existing building into residential, mixed-use with housing or nonresidential uses, and is most commonly associated with historic buildings. The COVID pandemic significantly impacted retail and office markets, leaving millions of square feet across the United States as vacant, as people shifted to online shopping and remote working. As the demand for nonresidential spaces has diminished, there is a need to reevaluate the City of Pasadena's (the "City's") building stock, specifically vacant or under-utilized nonresidential buildings. At the same time, the City recognizes the need to further the production of local housing that is affordable to a wide range of individuals and suitable for the varied needs of local residents.

The proposed Zoning Code Amendments (the “Amendments”) would reduce regulatory barriers to incentivize the conversion of nonresidential buildings to multifamily and mixed-use with housing, accommodate innovative housing types, accelerate the production of additional housing units, and encourage the productive use of underutilized buildings.

The City’s 2021-2029 General Plan Housing Element includes Program 6 (Housing Sites), which calls to incentivize the adaptive reuse of nonresidential buildings for residential uses and to establish an ordinance to allow the adaptive reuse of nonresidential buildings for residential uses, including eliminating Title 17 of the Pasadena Municipal Code (the “Zoning Code”) requirements that are not related to building and/or fire safety codes. Program 6 also includes an objective to facilitate additional and diverse housing opportunities in Northwest Pasadena, either through alternative housing types and/or acquisition/rehabilitation/adaptive reuse. The City’s 2015 General Plan Land Use Element includes Policies 8.4 and 10.6 (Adaptive Reuse), which call for the adaptive reuse of structures to promote historic preservation, support environmental sustainability and improve economic development.

ADAPTIVE REUSE TRENDS:

Tri-Cities Office Market

Pasadena currently has 13.9 million square feet of office space, compared to 12.6 million in Burbank and 10.2 million in Glendale (collectively known as the Tri-Cities Area). Vacancy rates for Pasadena have gone from 11.8 percent in 2019 (pre-COVID) to 26.8 percent in 2021 (COVID peak) to 19.8 percent in 2024 (post-COVID). The City’s vacancy rates have been consistently higher than the rates for Burbank, but lower than the rates for Glendale. In addition, the City’s office stock is older than that for Burbank and Glendale (with 50 percent of the City’s office stock constructed before 1980, compared to less than 30 percent for the other cities). Overall, the statistics place Pasadena in the “middle of the pack” compared to the Los Angeles Region. While vacancy rates have declined since the COVID peak, industry professionals predict it will remain high in the foreseeable future.

Existing Ordinances

Cities across the United States are adopting adaptive reuse ordinances to streamline the process to convert vacant retail and office space to housing and other uses. Staff researched existing ordinances from throughout California, including those for the cities of Los Angeles, San Francisco, Long Beach and Santa Ana. The model Los Angeles Ordinance was first adopted in 1999 and is in the process of being updated and has resulted in over 12,000 new housing units in the downtown area (mostly involving the reuse and restoration of historic structures). The updates propose to expand the program citywide, reduce the minimum age of structures to be eligible and provide more flexibility in meeting zoning requirements. However, projects would still be required to comply with inclusionary housing requirements.

While Pasadena does not have an existing ordinance, it has a long history of adaptively reusing historic structures – from office, industrial and public buildings to multifamily, mixed-use with housing and restaurants. Examples include the Raymond Theatre (Perkins Palace), the Stuart at Sierra Madre Villa (Stuart Pharmaceutical) and the Del Mar Station (Santa Fe Depot). The most recent example in the City is the project at 380 to 388 Cordova Street, where a new 5-story structure with 48 residential units was constructed in an existing parking structure and a 7-story office building was converted into ground level office space and 57 upper-level residential units. Some of the challenges this project faced were complying with appurtenance height on a building already over height, meeting open space requirements, and meeting current ingress/egress standards. In addition, since the existing building exceeded FAR there were limited opportunities

to construct additions. Staff discussed the project's unique challenges with the applicant team to understand what updates could benefit future projects.

Key Elements of Successful Projects

Certain requirements must be met for an adaptive reuse project to be feasible, including, but not limited to, the square footage of the property, floor plate size and depth, vacancy rate, proximity to amenities and potential residential rents or sales prices. When evaluating potential projects, developers look at many factors including the location of the building (in terms of nearby amenities and potential rental markets), how the floor plate can convert to the layout of residential units (e.g., location of windows, ceiling heights, etc.), and if the building needs to be retrofitted or brought up to current code requirements. Projects may also require zoning entitlements (e.g., variances or design review), which can be seen as a regulatory barrier and add time to the development process.

In September 2023, staff attended a workshop on adaptive reuse, where a presentation was given on office buildings along Lake Avenue in Pasadena between Green Street and the 210 Freeway (the analysis was completed by local author and architect David Thurman). A total of 10 buildings were analyzed, with heights ranging from three to 11 floors. The buildings combine for a total of 1.7 million square feet of space (or 12.2 percent of the City's total). One of the buildings was constructed pre-1980, five in the 1980s, two in the 1990s and one post 2000. While the average vacancy rate was 24.7 percent, the rates varied considerably from one building to another – with the lowest at only six percent vacant and the highest at 54 percent vacant. The analysis then used a weighted 'scorecard' of criteria to evaluate the building's potential for conversion. This included vacancy rate, floor plate size/depth, building form and site context/location. The analysis concluded that three of the buildings would be good candidates for reuse, three would be average and four would be poor. This is consistent with other studies, which state an average of 30 percent of downtown office buildings could be candidates for conversion.

RECENT CITY AND STATE EFFORTS:

Nonresidential to Nonresidential

The City recently studied conversions from nonresidential uses into other nonresidential uses, most recently in the Zoning Code updates for Research and Development (R&D) land uses and in the newly adopted specific plans. In December 2023, the City Council approved Zoning Code updates to streamline the process for establishing and expanding R&D and Life Science facilities in the City. This included simplified definitions for office and non-office uses, eased restrictions on floor area, open space, and parking requirements, and greater allowances for building heights and rooftop equipment. The newly adopted specific plans also include regulations that make it easier for nonresidential buildings to be reused by other nonresidential uses. Parking requirements were standardized for all office, retail, restaurant, and service uses – allowing the transition from one use to another without the provision of new parking. In addition, the specific plans do not require new parking for projects within designated historic resources and buildings built before 1970. This Amendment helps alleviate the City's entitlement process, specific to parking and historic resources, to further facilitate the reuse of existing buildings into nonresidential uses.

Nonresidential to Multifamily and Mixed-use with Housing

The City's current regulations do not prohibit the adaptive reuse of buildings where housing is already permitted; however, it can be challenging for older buildings to conform to current Zoning Code development standards, including floor area ratio (FAR), setbacks, open space, height and

parking. The City has recently adopted the following incentives and exceptions in the Zoning Code that encourage the adaptive reuse of existing buildings:

- New Specific Plans – Removes the requirement to increase parking due to a change of use for historic resources and structures built prior to 1970;
- Zoning Code Section 17.50.230 (Religious Facilities) – Removes common open space requirements and reduces parking requirements for existing religious structures reused as affordable housing;
- Zoning Code Section 17.62.130 (Incentives for Preserving Historic Resources) – Reduces parking requirements and permit fees for designated historic resources;
- Zoning Code Section 17.61.080.H (Variances for Historic Resources) – Provides relief from the Zoning Code for historic resources; and
- Zoning Code Section 17.50.075 (Conversion of a Hotel or Motel to Affordable Housing) – Allows for the conversion of an existing hotel or motel with 80 guest rooms or less into affordable housing, including supportive housing, transitional housing, and single-room occupancy (SROs). This Section also allows for the modification of FAR, lot coverage, setbacks, common area requirements, landscaping, and parking.

Building and Fire Safety Codes

Buildings that are proposed to be converted to residential uses may have been built to different code requirements and must be updated to meet current residential building and/or fire safety codes, including accessibility compliance, ingress and egress, and access to windows. Most of these requirements remain outside the purview of the Zoning Code, and instead are dictated by the state or federal government. In response, the state legislature passed Assembly Bill 529 (Adaptive Reuse Projects Act) in 2023, which requires the Department of Housing and Community Development (HCD) to convene a working group by the end of 2024 with the California Building Commission, Energy Commission, State Fire Marshal, Public Utilities Commission, local government representatives, and stakeholders. Once established, the group will identify challenges and opportunities that help support adaptive reuse residential projects and will recommend possible updates to state building standards. The bill also adds adaptive reuse to the list of pro-housing local policies, specifically, the “facilitation of the conversion or redevelopment of commercial properties into housing, including the adoption of adaptive reuse ordinances or other mechanisms that reduce barriers for these conversions.”

Since the City does not have the authority to update building and/or fire safety codes, these Amendments focus on updates to the Zoning Code. Also, since the main issue for nonresidential to nonresidential (complying with current parking requirements) is addressed, most of the Amendments focus on the reuse of nonresidential buildings to multifamily and mixed-use with housing.

OUTREACH EFFORTS:

August 9, 2023 – Planning Commission Study Session

Staff provided an overview of existing regulations pertaining to the adaptive reuse of buildings as well as potential Zoning Code updates to generate housing production in Pasadena. Commissioners provided the following feedback for staff:

- Focus on flexibility in adaptive reuse standards to help facilitate projects;
- Look at allowing open space in other places than ground floor such as rooftops;
- Consider creating a menu of concessions to exempt or reduce certain standards (e.g., height, parking, setbacks, and open space);

- Contact local architects to receive feedback on their challenges to adaptive reuse; and
- Work with the Building Official to relax local variations to the Building Code.

Public comment included the following topics:

- Support for adaptive reuse as it is more environmentally responsive than demolition and new construction;
- Recognize that adaptive reuse can be cost prohibitive in some cases;
- Focus adaptive reuse to the office buildings on the Lake Avenue corridor, specifically to address large concrete plazas; and
- Comment that the City should be doing everything possible to facilitate housing production.

Public Outreach

Staff met in small group settings and held larger workshops with industry professionals and historic preservation advocates to discuss existing regulations, barriers to adaptive reuse, and obtain feedback on potential updates. One reoccurring theme was to provide greater flexibility in regulations. Feedback included the following:

- Apply the updates citywide, rather than just one geographic area;
- Allow for flexibility in current regulations, including parking requirements;
- Consider by-right approvals for adaptive reuse projects to streamline the development process and reduce delays to convert existing structures; design review is seen as too cumbersome;
- Consider reduced requirements for ADA or the minimum to meet state code;
- Reduce or consolidate the number of required City inspections; and
- Costs to redevelop existing properties is high; most buildings do not have floor plans that lend themselves to residential housing.

PROPOSED INCENTIVES AND UPDATES:

Proposed Zoning Code Incentives

Based on the feedback from the Planning Commission and outreach with stakeholders, staff recommends the following:

1. **Eligibility.** Unless otherwise noted, adaptive reuse projects would be defined as any change of use of nonresidential buildings to multifamily or mixed-use with housing, where multifamily housing is currently permitted. Housing would continue to be prohibited on properties where residential is not allowed. To discourage speculative projects and truly incentivize re-use, buildings would become eligible a minimum five years after a certificate of occupancy is issued.
2. **Density (dwelling units/acre).** Currently, a residential project that does not include a density bonus must meet the density requirements of the Zoning Code. As part of the Amendments, if the land use designation, specific plan and/or zoning map permits a different density the highest density would be allowed without requiring the density bonus. For example, if the maximum density allowed by the zoning district is 32 dwelling units/acre and the corresponding General Plan Land Use Designation allows for a maximum density of 48 dwelling units/acre, an adaptive reuse housing project would be allowed to utilize the 48 dwelling units/acre standard. This would apply to existing buildings only and not new construction.

3. **Floor Area Ratio (FAR).** The Zoning Code does not require an existing building to meet FAR requirements when there is a change from one use to another. However, additions are required to meet FAR requirements. As part of the Amendments, the building's existing square footage or maximum FAR (whichever is greater) could be increased by 10 percent to provide residential amenities. Floor area added solely for the purpose of complying with building and/or fire safety codes (e.g., new stairways and/or elevator shafts) or to create mezzanines would not count toward FAR.
4. **Off-Street Parking.** As previously noted, the specific plans do not require new parking for projects within designated historic resources and buildings built before 1970. All other changes of use would be required to meet the current parking standards of the Zoning Code. As part of the Amendments, new parking for adaptive reuse multifamily or mixed-use projects would not be required, regardless of where the project is located or when the building was constructed. Therefore, if an adaptive reuse project required 50 off-street parking spaces and only 30 spaces exist, no additional parking is required (although the number of spaces provided cannot be reduced). Conversely, if the adaptive reuse project required 50 off-street parking spaces and 70 spaces exist, the number of off-street parking spaces can be reduced to 50 spaces (although the number of spaces provided cannot be reduced to less than 50).

If the project included new construction for residential or nonresidential uses (not counting areas exempt from FAR), the added square footage would be required to meet the current parking standards of the Zoning Code.

5. **Height and Appurtenances.** The Zoning Code does not require an existing building to meet current height requirements when there is a change in use. However, additions are required to meet maximum height standards. As part of the Amendments, the building's existing height or maximum height permitted (whichever is greater) could be increased by 15 feet for appurtenances (e.g., roof mounted equipment) and residential amenities (e.g., community rooms, trellises).
6. **Setbacks.** The Zoning Code does not require an existing building to meet current setback requirements when there is a change in use. However, additions are required to meet setback standards. As part of the Amendments, additions required for the purpose of complying with building and/or fire safety codes would be exempt from setback requirements.
7. **Open Space.** Currently, open space regulations vary by zoning district and residential land use type and can include common open space (e.g., pool areas, barbeque areas, rooftop gardens, recreation rooms, etc.), private open space (e.g., balconies, porches, etc.) and publicly accessible open space (public plazas, paseos, etc.).
 - Specific Plan Areas –
 - Multifamily – 200 to 275 square feet per unit, dependent on the number of bedrooms.
 - Mixed-use with Housing – If the nonresidential portion is more than 40,000 square feet, a minimum of five percent of the nonresidential floor area must be provided as publicly accessible open space (PAOS).
 - Other Areas of City –
 - City of Gardens (up to 48 dwelling units/acre) – 32 to 37 percent of the size of the site.
 - Urban Housing (more than 48 dwelling units/acre) – 30 percent of the building's net floor area).

- Mixed-use with Housing – 150 square feet per unit.
- Open Space Standards that Apply Citywide –
 - Includes minimum percentages for common open space and/or maximum percentages for private open space (as well as maximum percentages for common open space to be indoors).
 - Includes minimum dimensions for common open space and minimum square footages for common open space.

As part of the Amendments, staff proposes to utilize the mixed-use with housing standard of a minimum of 150 square feet of open space per unit for multifamily and mixed-use with housing adaptive reuse projects. This is based on comments received during public outreach and as demonstrated by the recent project at 380 to 388 Cordova Street. This ratio provides quality usable open space for residents in an existing building and aligns with the City’s open space standards for mixed-use with housing. Staff also recommends incorporating the following to provide additional flexibility:

- Allow open space to be common, private or any combination of both (i.e., no minimums or maximums for either);
- Remove maximum percentages for indoor common open space;
- Reduce minimum dimensions for common open space;
- Allow lobby areas to qualify as common open space (provided they include amenities like workstations, seating, meeting areas, etc.);
- Allow rooftop common open space be calculated at a rate of 1.5 to 1.0 (e.g., a roof deck of 1,000 square feet would count as 1,500 square feet); and
- Allow street setbacks and existing or voluntarily proposed publicly accessible open space qualify as common open space (provided they include amenities like seating, fountains, public art, etc.).

8. Design Review. Existing structures undergoing exterior alterations require design review if the changes are visible from the public right-of-way. Interior alterations are exempt from design review unless they materially affect a structure’s appearance from the public right-of-way. Currently, design review consists of the following steps: 1) Preliminary Consultation; 2) Concept Design Review; and 3) Final Design Review. The Director of Planning and Community Development (the “Director”) may authorize Consolidated Design Review (combining Concept and Final Design Review into one procedure). Depending on the size of the building, the review authority is either the Director or the Design Commission. Director decisions can be appealed to the Design Commission or called for review by a member of the City Council or Design Commission.

As part of the Amendments, the design review process would be streamlined to include the following steps: 1) Preliminary Consultation; and 2) Consolidated Design Review. The review authority would also be the Director for all adaptive reuse projects. Decisions could still be appealed to the Design Commission or called for review by a member of the City Council or Design Commission.

If the project includes new construction (not counting areas exempt from FAR), the new square footage for the project would be required to comply with the design review thresholds outlined in the Zoning Code.

Other Zoning Code Updates

In addition to the specific incentives outlined above, the Amendments include other changes to remove barriers related to parking and historic resources. These updates would apply to adaptive reuse projects and other projects citywide.

Shared Parking

Currently, Zoning Code Section 17.46.050 (Shared Parking) allows the reduction of parking spaces where the hours of operation for different nonresidential uses allow the shared use of parking spaces without conflict. The parking spaces could be on the same or contiguous parcels, or on separate parcels. Shared parking requires Hearing Officer approval of a Minor Conditional Use Permit (MCUP) at a public hearing. If the parking is on separate parcels, it must also be located within an allowable walking distance (which varies from 500 feet to 1,500 feet, depending on the zoning district and whether the parking is for customers/visitors or employees). The Zoning Administrator may require the applicant to submit a parking study to assist in determining the appropriate shared parking reduction. If the parking is on separate parcels, a signed contract between both property owners is required.

Assembly Bill (AB) 894 went into effect January 1, 2024. It requires cities to allow for shared parking when at least 20 percent of a development’s parking is underutilized during peak periods and any offsite parking is no more than 2,000 feet apart (walking distance) or a shuttle service is provided. The bill also requires cities to approve a shared parking agreement if the application includes a parking analysis using peer-reviewed methodologies developed by a professional planning association and secures a long-term provision of parking spaces or affords the opportunity for periodic review and approval by the local agency. Requirements for the provision of accessible spaces and electric vehicle parking space standards would still apply.

As part of the Amendments, the Zoning Code would be updated to comply with AB 894. However, the proposed changes would not be limited to adaptive reuse projects and would apply to any project that proposes shared parking. Standard conditions of approval would be incorporated into the Zoning Code. The review authority would change from the Hearing Officer to the Director. Decisions could still be appealed to the Board of Zoning Appeals (BZA) or called for review by a member of the City Council or Planning Commission.

Tandem Parking

Currently, Zoning Code Section 17.46.080 (Tandem Parking) requires an MCUP for certain nonresidential uses, allowing up to 75 percent of the total off-street parking spaces as “double” tandem parking and up to 50 percent as “triple” tandem parking (tandem parking is already permitted by-right for residential uses, provided the tandem spaces are for the same unit). Tandem parking for nonresidential uses requires a full-time parking attendant be on duty at all times the parking facility is available for use as a condition of approval. As part of the Amendments, the review authority would change from the Hearing Officer to the Director. Decisions could still be appealed to the BZA or called for review by a member of the City Council or Planning Commission. The proposed changes would not be limited to adaptive reuse projects for nonresidential uses. Rather, they would apply to any nonresidential project that proposed tandem parking.

Variance for Historic Resources

The purpose of Zoning Code Section 17.61.080.H (Variance for Historic Resources) is to provide relief from the strict compliance with the development standards of the Zoning Code to accommodate historic resources on properties that are undergoing development, are adaptively reused or are being relocated onto a new property. Examples include reduced parking for a change in use, reduced setbacks for a historic resource that is relocated, and modified development standards for new construction to preserve an on-site historic resource. A Variance for Historic Resources currently requires Hearing Officer approval at a public hearing, subject to making the following findings:

1. *The Variance for Historic Resource is necessary to facilitate the appropriate use of an existing historic structure;*
2. *The Variance for Historic Resource would not adversely impact property within the neighborhood or historic district; and*
3. *Granting the Variance for Historic Resource application would be in conformance with the goals, policies, and objectives of the General Plan and the purpose and intent of any applicable specific plan.*

While the overall purpose of the Zoning Code Section is to encourage the retention and protection of historic resources on properties undergoing development, being adaptively reused, and relocated, staff found that finding #1 should be modified to respond more appropriately to the purpose of this Section. Currently, the finding only speaks to facilitating the appropriate use of a historic resource and the use of the structure is not typically affected by a development standard that would require a Variance. This finding would be revised to the following:

“The Variance for Historic Resources is necessary to facilitate development on properties with historic resources, historic resources that are adaptively reused, and/or relocation of historic resources”.

Updating the finding to align with the purpose of the Zoning Code Section would allow staff to more effectively evaluate a project that qualifies for the Variance for Historic Resources. Retaining a historic resource on a property undergoing development poses challenges and at times can be a barrier. Clarifying the process to approve an application would provide an avenue to consider an appropriate relocation plan for the historic resource or modify development standards for new construction to help retain an on-site historic resource.

Currently, a Variance for Historic Resources is processed using the procedures for a Minor Variance, where the Hearing Officer is the review authority and a decision can be made without a hearing if a hearing is not requested by any interested party. As part of the Amendments, the review authority would change from the Hearing Officer to the Director. Decisions could still be appealed to the BZA or called for review by a member of the City Council or Planning Commission. The proposed changes would not be limited to adaptive reuse projects with a historic resource. Rather, they would apply to any project with a historic resource.

ENVIRONMENTAL DETERMINATION:

An Initial Study (IS) and Environmental Impact Report (EIR) was prepared for the Pasadena General Plan in compliance with the California Environmental Quality Act (CEQA) and certified by the City Council on August 17, 2015 (State Clearinghouse No. 201391009). An Addendum to the IS/EIR has been prepared analyzing the proposed Amendments pertaining to adaptive reuse projects in compliance with Section 15164 (Addendum to an EIR or Negative Declaration) of the CEQA guidelines (Title 14, Chapter 3, Article 11). The addendum found that the project revisions will not result in any potentially significant impacts that were not already analyzed in the IS/EIR.

The EIR analyzed potential citywide impacts, broad policy alternatives, and programmatic mitigation measures associated with the General Plan Update. The Zoning Code updates primarily focus on refining and/or establishing objective development standards to achieve the goals and vision of the General Plan. The revised project includes updates to the following components of the Zoning Code to bring it into alignment with the General Plan: types of use; policies; objective development and design standards; and parking requirements.

The Addendum was prepared pursuant to CEQA Guidelines § 15164(a) which allows a lead agency to prepare an addendum to a previously certified EIR if only minor technical changes or additions to the previously certified EIR are necessary but none of the conditions described in CEQA Guidelines § 15162 requiring preparation of a subsequent EIR are present. The analysis demonstrates that the proposed modifications evaluated in the Addendum would not result in conditions meeting the criteria set forth in CEQA Guidelines § 15162. Therefore, pursuant to PRC § 21166 and CEQA Guidelines § 15162, preparation of a subsequent EIR is not required. Refer to Attachment C for the Addendum to the General Plan EIR.


CONCLUSION:

Staff has incorporated feedback from the Planning Commission study session and worked closely with stakeholders to identify and reduce regulatory barriers to the development of adaptive reuse projects. Therefore, Staff recommends that the Planning Commission recommend that the City Council make the required findings and adopt the proposed Amendments.

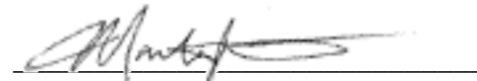
Respectfully Submitted,


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Attachments (3):

- Attachment A: Findings for Zoning Code Amendments
- Attachment B: August 9, 2023 Planning Commission Study Session Memo
- Attachment C: Addendum to the General Plan EIR