

ATTACHMENT D



PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

MEMORANDUM

DATE: OCTOBER 8, 2025

TO: PLANNING COMMISSION

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

SUBJECT: ZONING CODE AMENDMENT RELATED TO OBJECTIVE DESIGN STANDARDS FOR HIGH-DENSITY RESIDENTIAL DEVELOPMENT

RECOMMENDATION:

It is recommended that the Planning Commission:

1. **Recommend** that the City Council find that the proposed Zoning Code Amendment is exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3), the "Common Sense" exemption, where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.
2. **Recommend** that the City Council adopt the Findings for the Zoning Code Amendment in Attachment A; and
3. **Recommend** that the City Council approve the Zoning Code Amendment as outlined in Attachment B.

BACKGROUND:

In 2019, Senate Bill 330 (the Housing Crisis Act) became law, specifying that local jurisdictions shall not impose or enforce new design standards established after January 1, 2020 for multi-family residential and mixed-use projects, unless such standards are objective in nature. As defined by California Government Code Section 65589.5(h)(8), "objective" means "involving no personal or subjective judgement by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official."

Changes in State Density Bonus law additionally require cities to allow the greatest maximum density allowed for a site in the Land Use Element, Zoning Code, and/or applicable Specific Plan when calculating density bonus. Therefore, densities up to 87 units per acre plus available density bonuses are permitted in many areas of Pasadena. In response, the City Council directed staff to develop objective design standards applicable to high density residential and mixed-use projects (at densities greater than 48 units per acre) and augment existing development standards in the

Zoning Code, recently adopted Specific Plans, and existing design standards. The standards are intended to address the design and aesthetics of higher-density development while accommodating legislative requirements (Attachment C – Map of Areas).

DEVELOPMENT OF OBJECTIVE DESIGN STANDARDS:

Staff is developing objective design standards for high density residential and mixed-use projects with densities greater than 48 units per acre to supplement existing standards and design guidelines adopted prior to January 1, 2020 that remain effective. Staff initially retained Moule & Polyzoides to assist in the development of these objective design standards, whose insight, along with the extensive work of the Central District Specific Plan Planning Commission Subcommittee, was valuable in the development of draft standards.

The effort studied existing objective standards currently applied by the City, such as the City of Gardens and Urban Housing requirements, and the recently adopted objective standards of the Specific Plans (such as floor area ratio, height, open space, building modulation, frontage, setbacks, and step backs), building upon or modifying some of these standards, and creating new standards.

Staff held a total of nine meetings with the Planning Commission and/or the Design Commission which were open to the public, including presentations where staff provided information to commissioners for discussion and direction, workshop-style sessions to discuss potential standards and seek clarification and guidance from commissioners, and a walking tour of various sites in Pasadena to get an in-person, human-scale feel for existing buildings and elements that made them successful at a pedestrian level.

Prior Study Sessions/Workshops:

January 25, 2023 – Planning Commission study session to introduce the objective design standards, provide background information, and options for amending the Zoning Code. The Commission expressed an interest in holding an in-person walking tour to examine building sites throughout Pasadena and provide guidance on successful and unsuccessful elements.

March 4, 2023 – Planning Commission walking tour of 10 high-density residential and mixed-use sites throughout the City. The tour included the Commission, staff, the consultant, and members of the public. Participants noted both successful and unsuccessful elements such as material quality, private and common open spaces such as balconies and paseos, residential entrance treatments such as stoops, roof forms, and parking entrance design.

April 12, 2023 – Planning Commission study session at the Art Center College of Design to review comments received during the walking tour and introduce potential types of objective standards. Feedback included an interest in concise and implementable standards, streamlined processes, the use of scorecards and checklists by staff and applicants, and concerns regarding loss of sense of place, architectural compatibility, ensuring adherence to adopted standards, and application of standards as a function of street width.

September 13, 2023 – Planning Commission study session to discuss objective design standards, massing analyses and building typologies for sample sites. Feedback included a discussion of classic architectural principles related to design coherence, consistency, and compatibility, architectural styles that would be incompatible with higher-density residential development, form-based standards, distinct standards for “corridor” buildings and “interior neighborhood buildings”.

January 24, 2024 – Planning Commission study session to discuss a draft Table of Contents and review in-progress objective design standards such as development along Major Corridors and Neighborhood streets, garden spaces, building bulk/mass, and responding to the public realm. Feedback included addressing mixed-use buildings and ground floor design, incorporating sustainability standards, the contextual relationship between historic buildings, existing neighborhood context and new development, and a desire for simple standards.

July 23, 2024 – Design Commission study session to provide background, discuss existing standards and guidelines, and review sample draft standards. The Commission discussed the need for flexibility in architectural design and expressed concern that additional objective standards may result in formulaic design for development. Commissioners noted that the updated Specific Plans contain objective design standards and recommended providing examples of acceptable architecture or supplementing existing requirements with a limited number of new objective design standards without inhibiting architectural creativity and future development.

December 4, 2024 – Planning Commission public hearing to consider adoption of objective design standards. The Commission directed staff to consider the approach taken to adopt the City of Gardens standards with a goal of providing developers with a comprehensive guide towards the construction of simple, elegant and livable buildings that enhance community character.

May 10, 2025 – Planning Commission Saturday workshop to discuss existing objective design standards contained within the specific plans and the evolution of the City of Gardens standards, review a range of architectural elements and styles both within Pasadena and outside of the City, and engage in discussion regarding potential standards that could supplement existing regulations.

July 9, 2025 – Planning Commission and Design Commission joint study session to present an overview of State law, existing standards, observations of existing development at various densities in Pasadena and design progression over time, and potential standards to be considered by commissioners (Attachment D – Study Session Memo). The commissioners discussed the following items, grouped thematically below with the comments and subsequent clarification by staff included:

- **Architectural Style**

- *Identifying two architectural styles is too limiting. Mediterranean architecture is not a good choice for buildings above three stories tall.*
 - Staff Response: The proposed standards have been updated to more clearly articulate design principles that would result in “simple-form” and “articulated-form” box massing. The articulated form is intended to reflect Mediterranean characteristics and staff finds that there are multiple successful examples of this form throughout the City at the scale anticipated for high-density residential development.
- *Need to be careful in defining architectural styles and appropriate neighborhood context for certain styles of buildings. Buildings need to have a defined style, not hybrid of styles.*
 - Staff Response: The proposed standards have been refined to focus on simple massing forms and appropriate types of articulation, which are

intended to allow for a range of architectural styles. The proposed standards are intended to allow for distinct building forms that would be appropriate throughout Pasadena without overly restricting creative expression.

- **Base/Middle/Top**

- *For base, emphasize pedestrian scale. Consider parameters such as base varying between 10 feet and 18 feet in height, a minimum 70% of the base being built to the setback line and allowing 30% of the base to be modulated by no more than three feet in depth. A 15-foot base may be too limiting.*
 - Staff Response: The proposed standards were updated to allow for a base height range of 15 to 20 feet and require 100% of the base to be built to the required setback line.
- *Develop common standards that reflect “eyes on the street”, including a percentage of glazing length based on street hierarchy, activated common or public ground-level uses, and ground-floor residential units.*
 - Staff Response: The majority of projects subject to the proposed objective design standards occur within Specific Plan Areas, which have window transparency and ground-floor use requirements. The proposed objective design standards would not modify or change these standards and would also require a residential lobby along with commercial space, amenity space and/or courtyard openings at the base of all high-density residential buildings.

- **Façade Length/Massing Breaks**

- *How do standards for façades with more than two breaks intersect with base/middle/top requirements?*
 - Staff Response: As currently proposed, buildings would be required to incorporate base/middle/top standards as well as features that differentiate facades on either side of a required façade break.
- *Need smaller, village-like blocks instead of large blocks and consideration of existing context when creating larger projects.*
 - Staff Response: Massing breaks would be required along with façade differentiation through materials and colors to avoid the sense of a large block. Large façades would be required to have a complete building separation which may be used for pedestrian passages to break up large sites, activate ground spaces, and serve as an extension of the public realm.

- **Building Craftsmanship Elements, Colors and Materials**

- *Limiting to two colors is too strict. Consider requiring hues within certain tones.*

- Staff Response: The proposed standards were updated to allow for an additional building color within recessed openings and for balconies, set-back top floors and other detailing. Requiring specific hues may be too prescriptive and colors would continue to be reviewed during design review.
- *Are we considering the cost and environmental implications of requiring/prohibiting certain materials?*
 - Staff Response: Cost and environmental implications of the proposed standards are not expected to be greater than existing. Simpler designs are expected to be most cost-effective and use less building materials.
- *Provide objective standards by style for building craftsmanship elements and materials.*
 - Staff Response: The proposed standards have been updated to more clearly articulate design principles and building craftsmanship elements that are appropriate for both simple-form and articulated-form box massing.
- *Proposed material standards are too limiting and do not accommodate new materials and innovative facades. Consider alternative compliance method where modern innovative materials may be used. How would Design Commission opine on proposed development?*
 - Staff Response: The intent of the proposed objective design standards is to ensure that high density residential and mixed-use developments are simple in form, massing, and detailing. Staff proposes to allow projects that are consistent with the proposed standards to proceed through Consolidated Design Review for a streamlined process. Projects that choose to deviate from the standards in terms of material choice or other elements would go through the traditional design review process, allowing architects and developers to choose the path that suits their individual project.

- **Ground Floor Entries**

- *Front stoops might not be used as intended and present resident safety concerns.*
 - Staff Response: Front stoops are an optional design element that provide an alternative means of entry for individual ground-floor units and create a transitional space between the public and private realms.

- **Windows/Fenestration**

- *Window jamb and header trim should not be prohibited.*
 - Staff Response: The intent of these standards is to ensure simplicity and elegant design as reflected by traditional buildings in Pasadena, which typically did not have window jamb and header trim.

- *Solid-to-void proportion range is not practical. New lifestyles and window performance naturally allow for a greater proportion of glazing. Separation requirements should relate to habitable rooms instead of façade.*
 - Staff Response: Based on a study of traditional buildings in Pasadena, a range of two to eight feet of separation between windows was found to be appropriate and provides sufficient flexibility.
- **Balconies**
 - *Allowing balconies to extend beyond two habitable rooms may relate better to building typology. Limiting balconies to two openings may be arbitrary.*
 - Staff Response: The proposed standards were updated related to balcony width and no longer include this limitation.
- **Open Space**
 - *Current open space requirements are not feasible.*
 - Staff Response: The proposed standards do not include modifications to existing open space requirements aside from a credit for incorporating rooftop gardens. Projects consistent with the proposed standards may incorporate open space through private balconies, rooftop space, and space within the center of the building among other options.
- **Density Bonus and existing Affordability Requirements**
 - *All projects will use density bonus with incentives and waivers. Unlikely to see full compliance with standards. Consider reducing or eliminating inclusionary housing requirements or lower in-lieu fees to make development more attractive.*
 - Staff Response: The proposed standards would reduce existing building modulation requirements and require simpler exterior treatments, which are less restrictive than current standards within Specific Plan Areas. The proposed standards would not include modifications to the City's Inclusionary Housing Ordinance.
- **General**
 - *Should have an overarching statement of how we expect and want to live in Pasadena over the next 10-30 years. Honoring the past but recognizing that people live differently and move around the city differently today*
 - Staff Response: The General Plan Land Use Element includes eight Guiding Principles that cumulatively represent the community's vision for the future. These principles include requiring new development to build upon Pasadena's strong sense of place and great neighborhoods as well as ensuring that new development is safe, well-designed, accessible, and human-scale. The proposed standards are intended to further these goals.

- *Massing, articulation, fenestration, and base/middle/top standards shown may be common to all styles.*
 - Staff Response: The proposed standards and terminology were updated to more clearly allow for and distinguish different building massing types, both of which would be appropriate in Pasadena.

Draft standards were reviewed with legal counsel for objectivity and to ensure that proposed standards would not represent an unreasonable constraint on housing production. With thorough review and vetting of possible approaches, this resulted in the proposed objective design standards outlined in the next section.

PROPOSED STANDARDS:

To promote simplicity and elegance in new building designs and based on extensive review of existing buildings of similar scale to what is expected for new high-density residential and mixed-use buildings, both in and outside of Pasadena, staff recommends two sets of Objective Design Standards: Simple Form Standards (previously referred to as “non-Mediterranean”) and Articulated Form Standards (previously referred to as “Mediterranean”), either of which may be selected by an applicant. The Simple Form and Articulated Form standards are intended to result in different building typologies and cannot be mixed to create a hybrid set of standards. Each set of standards is organized into six categories:

- Massing and Articulation;
- Base, Middle and Top Building Design;
- Fenestration and Solid-to-Void Ratio;
- Building Entries;
- Building/Craftsmanship Elements; and
- Materials and Colors.

Staff finds that, within the areas of the City where development of this scale would be permitted, both sets of standards would result in new buildings that are appropriately designed to relate to Pasadena’s architectural legacy and could fit within any context. The summary of the proposed standards is provided in Attachment B.

Staff also proposes objective design standards to further address sustainability by requiring the incorporation of cooling strategies to promote pedestrian comfort and energy efficiency. Currently, only projects subject to the City’s Climate Action Plan Consistency Checklist (i.e., projects that require discretionary review and are not exempt from CEQA, as well as projects utilizing a Class 32 exemption for in-fill development projects) are required to include passive design techniques aimed at increasing energy efficiency by reducing solar heat gain. Staff recommends incorporating more explicit sustainability standards for projects subject to the proposed Objective Design Standards. These include:

- Requiring building facades to include a specific percentage of structural elements such as awnings, canopies, overhangs, fins, and covered balconies along east, west, and south-facing frontages to provide shade for pedestrians as well as reduce solar heat gain within buildings. Buildings using the Articulated Form standards would not be permitted to use fins and/or canopies but would be permitted to incorporate the other listed elements.

- Alternatively, an applicant may opt to provide rooftop gardens as a percentage of the roof area, or additional tree canopy within required setbacks or common open space in lieu of the structural elements listed above, as alternative strategies to reduce solar heat gain and building energy consumption.
- Allowing rooftop gardens to count towards an existing Common Open Space requirement at a rate of 1.5 to 1.0 (the same as Adaptive Reuse development). For example, a 1,000 square foot rooftop garden would count as 1,500 square feet of required open space.
- Projects located outside of Specific Plan areas will be required to provide the same amount of tree canopy in Common Open Space areas as required by the Central District Specific Plan, at a ratio of one 24-inch box tree per project, or one for every 500 square feet of common open space, whichever is greater. For projects with two or more trees, a minimum of 50 percent of trees planted shall be shade trees. Trees shall be selected from the City's Protected and Native Species list.

Design Review Process

Staff proposes to streamline the design review process for projects subject to the Objective Design Standards, allowing such projects to go through a two-step Preliminary Consultation and Consolidated Design Review process in lieu of the current three-step, Preliminary Consultation, Concept Design Review, and Final Design Review process. Projects subject to the proposed Objective Design Standards will continue to be subject to existing objective standards and design guidelines adopted prior to January 1, 2020.

ENVIRONMENTAL DETERMINATION:

The action proposed herein is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15061(b)(3), the "Common Sense" exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. Such is the case with the proposed Zoning Code text amendments to create objective design standards for high-density residential development.

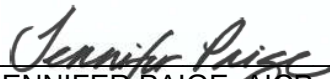
NEXT STEPS:

Following a recommendation by the Planning Commission, staff will present the objective standards to the City Council for consideration and adoption. Following City Council adoption, staff will develop a checklist of the standards to supplement the codified development standards which will include graphical illustrations that visually demonstrate the standards.

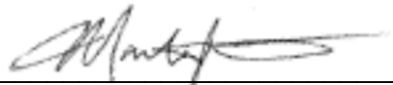
CONCLUSION:

Staff has worked to incorporate feedback from the Planning Commission, Design Commission, and the public to develop objective design standards that build upon existing design-related regulations for residential and mixed-use development at densities greater than 48 dwelling units per acre. Staff recommends that the Planning Commission recommend that the City Council make the required findings and adopt the proposed Zoning Code Amendments.

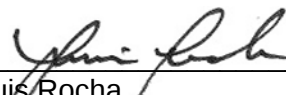
Respectfully Submitted,


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Attachments (4):

- Attachment A: Findings for Zoning Code Amendments
- Attachment B: Summary of Proposed Development Standards
- Attachment C: Map of High-Density Residential Zones
- Attachment D: July 9, 2025 Joint Planning Commission and Design Commission Study Session Memo