



BUNGALOW HEAVEN™ NEIGHBORHOOD ASSOCIATION

Mr. Kevin Johnson
Design & Historic Preservation Section
City of Pasadena Planning & Community Development Department

September 22, 2020

Dear Mr. Johnson:

As you know, the Bungalow Heaven Neighborhood Association (BHNA) has participated in the ongoing process of revising the Historic Preservation Ordinance (HPO). In general, we are pleased with the suggested HPO amendments as proposed in the staff report for the September 23 Planning Commission hearing (referred to hereinafter as the “staff report”). However, some important areas of concern remain. Our comments and concerns are provided below.

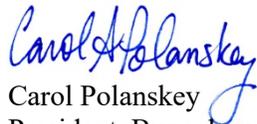
- 1. Demolition of garages (17.62.070 H. 20 & 21; staff report item 3, pages 6-9).** We strongly support the HPC recommendation (staff report page 2 #1) that demolition of garages should be changed to a major project from the current minor project designation. The staff report recommends against changing to major (discussion on pages 8-9). We disagree with the staff recommendation and strongly believe that the demolition of garages should be classified as major. Although period garages are secondary historical resources, they are important as integral components of the historic setting/context of the primary structure on a property, and also as part of the historic fabric of a district. We believe that increased scrutiny of demolition of garages will benefit historic resources in the city.
- 2. Process for amending or rescinding conservation plans (17.62.070 H. 1; staff report item 6, pages 10-11).** We strongly support HPC recommendation #4 (staff report page 2), which calls for the current requirement for written support by 51% of property owners to be replaced by a process of noticed public hearings. The staff report is hard to interpret on the subject. It appears that changes to the staff recommendations following the HPC hearing are intended to conform to HPC #4. However, the staff recommendations do not clearly state that the requirement for written approval of 51% of property owners is to be changed to a process of noticed public hearings. Notification of public hearings is recommended by staff to be a requirement, but without addressing the written approval requirement. We urge clarification of the staff report to clearly conform to HPC #4.
- 3. Criteria for amending conservation plans (17.62.070 H. 1; staff report item 6, pages 10-11).** The staff report recommends four criteria for amending conservation plans. We emphatically disagree with the second listed criterion, which in effect prohibits future conservation plan amendments that would create or extend any inconsistencies with the HPO. While full consistency between conservation plans and the HPO can make administration simpler, 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 only the other three criteria ensures that amendments are not in conflict with the intent of city ordinances while allowing neighborhoods with conservation plans to tailor requirements to their district.
- 4. Penalties for HPO violations (17.62.120; staff report item 10, page 13).** We believe that stronger penalties are necessary in order to address ongoing disregard of the HPO requirements. We applaud the staff recommendation to incorporate HPO-related education into the occupancy inspection

program, but we do not agree with staff's assessment that current penalties are sufficient. In our own neighborhood in the last three months, there have been notable violations of the HPO in the 1300 block of N. Michigan, 1100 block of Mar Vista, 900 block of North Holliston, and 1100 block of North Holliston (two there). Those violations are part of a continuing pattern, despite the staff report's assertion that few instances of violations occur (bottom of page 13). We strongly urge the imposition of monetary fines, the barring of contractors or architects from participating in jobs in the city for a period, and the submission of formal complaints to certifying agencies.

- 5. Findings required to change a property from NC to C (17.62.020 Table 6-5; staff report item 17, pages 16-17).** There is what appears to be an inadvertent error in the third criterion for changing contributing/noncontributing status. The suggested changes include, "...or by studying an identical building..." The HPO recommendation (#2 on page 2) and the parallel paragraph on staff report page 8 (f) use the wording "similar building." Conversations with staff have indicated that the wording was intended to conform to the HPC recommendation and should have been "similar" rather than "identical." This is important because it would be very difficult to find an identical building. We request that staff report item 17 be revised to correct the wording.

The Bungalow Heaven Board of Directors appreciates the opportunity to continue BHNA's participation in the HPO update process. We ask that this letter be entered into the public record for the Planning Commission hearing.

Sincerely,



Carol Polansky
President, Bungalow Heaven Neighborhood Association