



Aug 19, 2020

City of Pasadena  
Planning & Community Development Department  
Attn: Martin Potter  
Hale Building  
175 N. Garfield Ave., 2nd Floor  
Pasadena, CA 91101

**Re: East Colorado Specific Plan – Round 3**

Dear Mr. Potter:

Pasadena Heritage would like to thank you and the rest of the Planning Staff for the continued commitment to the Specific Plan process, and for releasing the current draft plan in a format that is accessible, even during the current pandemic. Pasadena Heritage has some feedback on the proposals for the district, some of which provide clear suggestions, and others asking for further study or reconsideration. We do recognize that it is easier to critique than it is to draft a Specific Plan, and intend our feedback to be constructive. One overarching theme that remains throughout our comments is a call for consistency and a little bit of simplification. We believe that the East Colorado Plan Area should read as a cohesive neighborhood, and sub areas just minor variations of that neighborhood.

Our comments are organized by theme below. Thank you for allowing us this opportunity to provide feedback.

**Reconsider Façade Modulation and Façade Length Standards**

While we appreciate the thought and effort that have gone into these proposed modulation standards, we nonetheless find them problematic. We realize that long, unbroken facades can detract from a neighborhood, but there are often more refined ways to address them than prescriptive plane breaks. One of the most gimmicky trends in contemporary architecture are the protruding boxes (balconies) that suspend from the façade. These are often clad in a metal or faux-wood, or painted brightly. In many cases, the overall negative visual impact is due largely to the visual clutter on the façades. There are simply too many boxes, too many colors, and too many materials on these newer buildings. Along this thread, the requirement that the modulation be of different material may do more harm than good and should not necessarily be encouraged.

Jane Jacobs wrote about establishing a street rhythm, and we recommend reasonable standards that would push buildings in that direction. A building may be organized in repetitive bays, with various small shops at ground level, or it may have individual garden apartment entries at ground level, or it may have inset balconies at even intervals. We fear

that the 2' modulation may not necessarily make facades more attractive. Perhaps a menu of solutions: façade breaks (and increase the distance to be more meaningful – perhaps 4'), deeper inset windows, variety of windows, inset or extending balconies, and/or louvers would better in encouraging more creative design. We recommend further study on how older buildings in Pasadena and its surrounding environs successfully avoided monumental, blank façades in the past.

### **Reevaluate Ground Floor Height Minimums**

15' height can be excessive for new commercial space, and leads to increased building height overall. We are often advocates a strong base for buildings and differentiating commercial vs. residential uses in mixed-use buildings, but we have also dealt with numerous projects in the past that are too tall and out-of-scale with adjacent properties. After speaking to the architects, we discover they are bound by the 15' minimum at street level, to accommodate storefronts and also loading requirements. However, the nature of retail is changing. Some locations will not be appropriate for a major commercial tenant on the ground floor which might justify taller ceiling heights. Many small businesses such as cafes, boutiques, or coffee shops, which are what we think best fits into the East Colorado Specific Plan area, could be fine with 12' ceilings and have very minimal loading requirements. We suggest studying ways to pair minimum commercial height and loading requirements with actual projected uses. Perhaps a range of first-floor heights can be available depending on the specific site conditions and uses.

### **Mid-City & South Green to be Treated Holistically**

There is no real reason to differentiate between two subdistricts, except for height, and to protect the ficus trees along Green Street. Commercial and residential uses should be allowed in both districts, with 35' setback for units at ground level. Why is the south side of Green Street treated differently than the north? There seems to be no logical reason for it. Colorado should rightly allow for greater height than Green Street, and that suggestion is entirely appropriate. We could envision one-to-two stories of additional height on Colorado. Stepbacks on Green Street to protect ficus trees are essential, and street frontage along Green should be limited to one story as that is the current condition.

### **Consistency in Sidewalks**

Provide a more regular organization of sidewalks. Why does Colorado Boulevard get at 15' but Green St is 12'? If anything, Green Street is more walkable and could be reasonably be widened to 15'. This would allow additional space for the ficus trees. Nearly the entirety of Green Street is already over-engineered and three lanes of traffic is problematic. Perhaps the street should be targeted for some curb widenings to improve user experience.

### **22' Sidewalks on Michigan, Chester, and Holliston**

These wide sidewalks are a good recommendation for the pedestrian experience, but could better improve interconnectivity. The one exception to our overall consistent approach would be to repurpose one of these streets as a north-south connection for bike

riders. The sidewalk extension detail with path between street and tree line is essentially a Dutch style protected bike lane detail. Instead of doubling up on sidewalks, consider one as a bike lane. Due to its current character, this approach would make the most sense on Holliston Avenue (more commercial). Michigan and Chester Avenues (more residential) could both employ the alternative detail with the double allée of trees, which would encourage walkers and provide consistency for these smaller north-south streets.

### **Nix Walnut Commercial Subdistrict**

The Walnut Commercial subdistrict does not provide much added value for the East Colorado District. If it is treated separately from the Transit Corridor & Allen Residential subdistricts, then it provide mediation between them. Height/density should be somewhere in between, and mixed use should be allowed. As presented, it seems to be tailored to preserve lower scale commercial uses. The questions was asked: is this district designed as a carveout to protect Tops? If so, there are better ways to address it. We suggest rezoning Walnut Commercial as a continuation of the Allen Transit subdistrict, with a moderately reduced height to step down to the lower residential uses to the south. Alternatively, the College District standards could potentially be repurposed here.

### **Consistency in College District, Gateway & Eastern Corridor**

We would like to see more public realm consistency across these three districts, which are united in their linear Route 66 heritage. Instead of slight variations in frontage zones, we recommend 4' amenity, 5' walk, and 6' frontage zones in all three. Where each district can vary is in its differentiation of height. The Gateway should rightly be a higher intensity of development than the other two.

In the Eastern Corridor, which allows up to 50% of the building to be setback, we ask that the 0'-3' setback is retained at the 75% setback range. The Eastern Corridor suffers from inferior street wall, mostly due to newer auto-focused businesses. Older businesses go right up to the property line to attract the attention of motorists on Route 66 while newer businesses are set back behind large parking lots. Interventions in this subarea should focus on pushing businesses closer to the street and allowing for parking in rear, inverting the relationship of the past several decades, and enlivening the street.

### **Setbacks Too Prescriptive and Arbitrary**

Instead of determining preset setbacks, would it make more sense to set up regular encroachment planes, which could angle 45° from the front setback and 30° from rear setback? As an example, both the Gateway and Allen Transit sub-areas would allow for 51' of street wall, and then successive stories must be within the 45° plane. This sets up different levels of mid-rise streetwalls in each district, but with a common upper story appearance. Buildings could choose a more traditional ziggurat-style massing, or in larger lots, a more simple residential box above one-or-two stories of commercial. We recognize that in three areas, the effective maximum height is 75' with the 12' bonus afforded through Pasadena's Affordable Housing Concession Menu, or even higher through the State's Affordable Housing Concession Permit process.

We recommend exploring Encroachment plane heights per sub-area as follows:

- Green Street – 15'
- Allen Neighborhood – 32'
- Eastern Corridor – 39'
- College District – 45'
- Walnut Corridor – 45' (if rezoned similarly to College District)
- Allen Transit – 51'
- Mid-City – 51'
- Gateway – 51'

An encroachment plane tool provides better protections against misuse of density bonus. If a developer requests 2 additional stories, they must step back. If this tool is not feasible due to restrictions from the State, tailor setbacks to be compliant with 45° and 30° angles already described.

We thank you for considering these comments, and look forward to reviewing the seven other Specific Plan areas.

Sincerely,



Susan N. Mossman  
*Preservation Director*



Susan N. Mossman  
*Executive Director*