



October 17, 2020

Honorable Mayor Terry Tornek
Members of the City Council
City of Pasadena
175 North Garfield Avenue
Pasadena, CA 91109

RE: Mansionization Phase 2: Zoning Code Amendment: Single Family Residential Development Standards (RS-1, RS-2, RS-4, RS-6)

Dear Mayor Tornek and Council Members:

The West Pasadena Residents' Association (WPRA) appreciates the opportunity to again comment on Phase 2 of the "mansionization" Zoning Code Amendment referenced above, given the significant adverse impacts of this practice in our residential neighborhoods.

Although we generally concur with several of the proposed amendments outlined in the staff report: architectural compatibility for materials and finishes, height limitations, fenestration limitations, some oversight for accessory structures, setbacks, and expanded notification measures, we would like to make the following observations and recommendations to further reinforce the ordinance:

- ◆ Neighborhood consistency regulations and guidelines should be clear and explicit. Often vague and indeterminate guidelines leave a great deal to interpretation that can result in misinterpretation at best, or in willful disregard—with uncertain and or lamentable consequences. It would be far more effective to broaden the suggested 500-foot compatibility radius to minimum 800 feet.
- ◆ The Planning Commission, at its September 9 meeting asked to "*Adopt neighborhood compatibility requirements and calculations, similar to those found in Section 17.29 (Hillside Overlay Districts), but administered through a ministerial plan check process.*" (p. 4 of staff report). In addition to story poles, it would be desirable to require digital modeling. Often it is difficult to visualize the spatial relationships from two-dimensional drawings and schematics, and story poles alone only show bulk. The use of story poles and digital modeling *combined* may clarify intent and provide effective visual and spatial references.

- ♦ It is important that accessory structures and accessory dwelling units comply in style and scale with the principal structure. It is not sufficient that the accessory structure is not visible from the public right-of-way; an incompatible structure is often visible from neighboring yards and homes. An incompatible and/or oversized accessory structure impacts views, privacy, sunlight, vegetation, aesthetics, and value of adjacent properties and encroaches on the rights of the adjoining neighbors. To this end, we are concerned that the staff recommends not returning to the Planning Commission at a later date to discuss design guidelines to address architectural compatibility. We understand staff's concern with attempting to establish architectural design compatibility where it does not currently exist, but it would seem that continuing to explore design guidelines through the Planning Commission would be a worthwhile effort.

- ♦ We would recommend strict time limits to complete remodels and new construction. Living adjacent to or in the proximity of endless construction erodes the quality of life and comfort of neighbors, and inhibits the use of their own property. Further, simultaneous construction activity (for example, next door and across the street, or behind) creates cumulative (sometimes insupportable) disruption and causes constant problems for the affected neighbor. Noise, parking intrusion, dust, construction traffic, trash, and safety breaches are continuous and unsupervised. We ask that the ordinance strictly regulate such activity and explicitly outline protections of neighbors who are being subjected to months (sometimes years!) of such insult.

- ♦ At times, the allowable ratio of the house square footage to the lot square footage (FAR)—because of variable lot sizes—does not ensure consistency in massing and scale. New construction or remodels that overwhelm and dwarf surrounding homes, *even when they are compliant under current standards*, need be rethought and revised. The norm should be established by the median square footage of the existing neighborhood homes--as suggested by staff--and not the size of the lot. However, 35% overage, as recommended in the staff report, is much too generous and will not sufficiently curb mansionization. The overage should be limited to a maximum of 25%.

- ♦ To our disappointment, to date ministerial plan check process has recurrently been ineffective and casual. Stringent and consistent review and confirmation of plans need to be in place prior to beginning construction. Once construction begins, systematic and knowledgeable oversight and inspections need to be conducted. There have been too many instances where deviations have been allowed or overlooked, and in some instances, remodels have turned into demolitions. Even designated or eligible historic homes have not been spared when oversight has been uninformed, casual, or neglected. Discretionary review has the potential to enhance this process and provide opportunity for public awareness and comment.

- ♦ Appropriate and meaningful penalties—both financial and operational—need to be in place to discourage the current trend of flaunting regulations to achieve owner, developer,

and/or speculator objectives. The existing negligible sanctions have not succeeded in serving as effective deterrents. Pasadena's historic and neighborhood fabric is continuing to erode, without any adverse consequences for the perpetrators.

- ♦ "Draft Design Review Guidelines for Single Family Residences," prepared in 2018 by John Kaliski Architects make a number of good recommendations and provide descriptive illustrations that could provide helpful references. The Planning Commission has recommended that these may be used to inform and educate applicants and serve as guidelines for their projects. We highly support this recommendation.

Specially in the last decade, we have seen an increase in oversized, architecturally strident and incompatible houses and remodels introduced into coherent, established, even historic neighborhoods that are the hallmark of Pasadena. These intrusions are degrading the character and design unity of our treasured neighborhoods, as well as eroding their privacy, visual integrity, and utility. Granted, multiple mandates from Sacramento overriding local planning decisions have made regulating such adventurism more difficult; but we are confident that as a leader in civic planning, Pasadena can marshal the will and tools to successfully stem this detrimental trend.

We appreciate the time and effort that has gone into this lengthy process, and submit the above recommendations and concerns for consideration and action.

Respectfully,



Dan Beal
President
For the Board of Directors



Mic Hansen
Chair, Planning

cc: David Reyes, Director of Planning and Community Development
Martin Potter, Planner
Takako Suzuki, Field Deputy, District 6
Sue Mossman and Andrew Salimian, Pasadena Heritage
Nina Chomsky, LVAA
Erika Foy, MHNA