



November 10, 2022

Steven Olivas, Chair, Planning Commission  
Members of the Commission

**WPRA Support of Interim Development Standards in Response to  
SB9 – Commission Study Session 11/10/2021**

Chair Olivas and Commission Members:

The West Pasadena Residents' Association commends staff's efforts to date to propose interim development standards for lot splits and duplex construction in RS zones, in response to the recently-adopted SB 9, and to do so as of SB 9's effective date of January 1, 2022.

WPRA also strongly endorses and supports the very comprehensive, well-researched and productive letter submitted on this date by the Linda Vista-Annandale Association.

WPRA particularly emphasizes the following:

- Development must be limited to a total of four units, whether duplexes or ADU/JADU's.
- New units should be limited to a maximum of 800 square feet.
- Bungalow court-style central courtyards should be required when feasible, reflecting the many historic bungalow courts in Pasadena.
- Designs should be complementary with Pasadena's decades-long commitment to respect of context and superior design.
- Strict design guidelines should be vigorously enforced.
- Landmark District provisions should be utilized to the maximum extent possible.
- The requirement for "two mature trees on-site" is unclear as to whether new trees are required or if existing trees are not to be removed. Removal of protected or favored tree species should also be prohibited.
- Prohibition of short-term rentals should specify all three types (hosted, non-hosted and vacation rentals) as the first two are legal in Pasadena.
- One off-street parking space per unit should be required except within one-half mile walking distance of public transit. The one-half mile walk should be on a reasonable public street route, actually measured, and not determined by radius.
- Infrastructure impacts should be assessed to the development and should be treated as a "specific adverse impact" if infrastructure

deficiencies are not addressed and mitigated. Lack of available on-street parking should be considered as a specific adverse impact.

- Long-term affordability covenants should be required.
- Specific fire mitigation and evacuation provisions must be included in high fire risk zones. SB 9's provisions are inadequate and merely reflect current building codes, and do not reflect hillside fire zones.
- Owner-occupant provisions should be required and strictly enforced with stringent penalties; however, how that requirement would be applied to business entities should be specified.
- All applicable standards of the City's Climate Action Plan should be required.

WPRA urges the Planning Department and City leadership to take every feasible legal and procedural step available to mitigate the many negative impacts of SB 9 on the City, and to reject representations of minimal impact. We look forward to working with the City and other interested parties in development of the permanent development standards.

Thank you for your consideration of our points of view.

Respectfully,



Dan Beal, President, WPRA  
For the Board of Directors

C: Mayor Victor Gordo  
Councilmember Steve Madison  
David Reyes, Director, Planning and Community Development

The WPRA is an all-volunteer organization dedicated to maintaining and enhancing the quality of life in southwest Pasadena. We represent nearly 8,000 households, including 1,000 paid members.