

ArtCenter

May 2, 2022

VIA ELECTRONIC MAIL

Mr. David Reyes
Planning Director
City of Pasadena
175 N Garfield Ave
Pasadena, CA 91101
E-Mail: davidreyes@cityofpasadena.net

Re: Draft South Fair Oaks Specific Plan Comments

Dear Mr. Reyes:

ArtCenter College of Design (“ArtCenter” or the “College”) is pleased to continue following the progress of the Draft South Fair Oaks Specific Plan (“Draft Plan”). We have had a chance to review the most recent Draft Plan presented to the City Planning Commission on April 13, 2022. Although the Draft Plan represents a tremendous step forward for this area of the City, we believe it is still lacking in a few fundamental ways. As described in further detail below, we are requesting the City modify the following elements of the Draft Plan:

1. The goals and policies of the HEART District are focused too heavily on promoting one type of use – medical office. For the Specific Plan to successfully create a new neighborhood, in the true sense of the word, the Draft Plan needs to more equitably include all components of the HEART District. As it stands, the other uses are treated as accessory and supplemental to medical offices.

To further the above, medical office uses should be strictly limited along Raymond Avenue to the south of Fillmore. The current limitation included in the Draft Plan does not sufficiently promote other uses in the area.

2. The west side of Arroyo Parkway should permit some form of residential uses, even if limited. To the north, near Fillmore Station, residential uses are permitted at a high density. To the south, ArtCenter's Master Plan permits student housing. Prohibiting housing in an area so proximate to public transit will further hamper the City's goals of establishing a transformative new neighborhood. The west side of Raymond Avenue and south side of Glenarm Street should include similar pedestrian improvements as the rest of the HEART district.



ArtCenter

3. The HEART District was envisioned for the purpose of creating a livable neighborhood around ArtCenter's South Campus. The Draft Plan's proposed height and density on Raymond Avenue and the west side of Arroyo Parkway should be increased to match the proposed development standards for Fair Oaks. These development standards are crucial to ensure the future livability of the area.

I. The HEART District / Medical Office Uses

As you know, ArtCenter's South Campus is located within the boundaries of the Draft Plan.¹ Specifically, the South Campus is within the Public-Semi Public ("PS") zoning district and within the overarching HEART district of the Draft Plan. It is also surrounded by two separate zoning districts under the Draft Plan: the Arroyo Gateway District ("AG") to the east along Arroyo Parkway and the Institutional Flex Space ("IF") district to the south across Glenarm Street. As the College's South Campus zone is defined by PMC17.20.020, which governs PS zone, all standards are determined by its previously approved Master Plan.

The overarching goal of the HEART District is to create a community that equitably represents and supports development for Health, Education, Arts, Research, and Technology. However, the goals as described in the Draft Plan emphasize more of a shift from industrial to primarily medical office. While medical uses are a strong economic driver for the region, the imbalanced focus of the Draft Plan will lead to a medical office core in the City at the expense of creating a true HEART district.

Goal 10 of the Draft Plan states that the HEART District should provide "an arts and medical district with a mix of land uses and amenities that creates an active district and serves residents, students, employee needs throughout the day." However, the emphasis should be on creating a 24-hour livable neighborhood, not an area that will continue to shut down after 5:00 pm. Figure 3.2-3 shows the Draft Plan currently provides a larger emphasis on medical uses than any other use described as being essential to the HEART District. For example, it calls out the area between Fair Oaks and Raymond as a "mix of medical-oriented uses, ArtCenter campus, amenities, and housing that leverage transit." Why doesn't the Draft Plan focus on the other uses that are critical to the HEART district?

Further, the same figure explicitly describes the need to "promote high-quality, creative architecture for medical office buildings through design guidelines." Although ArtCenter agrees that creative architecture is essential to the South Fair Oaks Specific Plan, it is

¹ ArtCenter has two campuses within the City of Pasadena ("City"). ArtCenter's South Campus is bounded by South Arroyo Parkway to the east, East Glenarm Street to the south, and South Raymond Avenue to the west (the "South Campus") The South Campus is located at 850 - 988 S. Raymond Avenue and 1101 - 1111 S. Arroyo Parkway.



ArtCenter

essential for all uses and not just as a focus on medical office. ArtCenter requests modifications be made to all goals, policies, and figures within the Draft Plan to more adequately capture the intent of establishing a true HEART District in Pasadena.

Additionally, the SFO-MU-C zoning district does not align with anything other than incentivizing medical offices. According to the Draft Plan, the SFO-MU-C zoning district is focused on "promot[ing] the development of a mixed-use, pedestrian-friendly neighborhood with a broad range of retail, medical office, labs, services, senior and multi-family housing." Why isn't this district also focused on promoting arts, education, and research uses? As currently drafted, there are not incentives for developers to construct anything other than primarily medical office buildings. To be sure, the Draft Plan does include a minor restriction on medical uses south of Fillmore along Raymond Avenue. However, this restriction does little to incentivize uses other than medical office. The restriction provides a requirement for medical and medical office uses to be limited to no more than 30% of the ground floor frontage along Raymond Avenue. However, these uses are in no other way restricted and other uses are not required along the street frontage. ArtCenter requests the City modify the Draft Plan to limit medical and medical office uses to a maximum of 30% floor area for the entire building south of Fillmore or explicitly providing that 70% of the ground floor frontage must be occupied by retail, arts, education, residential or restaurant uses. Without these modifications the City will only be creating a medical core that serves employees from 9:00 – 5:00 pm and becomes a ghost-town the remainder of the day.

II. Residential Uses / Pedestrian Enhancements

The Draft Plan divides the Specific Plan area into distinct zoning districts but does not adequately address residential uses in areas adjacent to those contemplated in the previously approved ArtCenter Master Plan. Although ArtCenter's Master Plan is governed by its own development standards and enjoys the benefit of previously approved student housing residential uses, the Draft Plan does not permit residential uses along a large portion of the western frontage of South Arroyo Parkway. Specifically, although the Draft Plan permits various types of residential uses, including multi-family housing, in the Mixed-Use Neighborhood and Mixed-Use Core zoning districts, none are permitted within the Commercial General district on the west-side of Arroyo Parkway between ArtCenter's campus and just south of Fillmore Station.² While the Draft Plan makes significant headway for growing local businesses, it does not provide sufficient housing opportunities to support the long-term health and growth of those businesses, nor would it provide complementary residential uses that are consistent with the ArtCenter Master Plan. To better serve the community, residential uses and/or mixed-use developments should also be permitted, at the very least, along the entirety of the west-side of S. Arroyo Parkway between Glenarm and Fillmore Station. ArtCenter has strived to create a future where students can live and feel welcomed into the community like any other Pasadenan. However, the removal of

² South Fair Oaks Specific Plan, Chapter 4.3.



ArtCenter

residential from this area coupled with the reduced height and density along both Raymond and Arroyo will disincentive community growth.

Additionally, the Draft Plan does little to focus on pedestrian realm enhancements beyond the connection between Huntington Hospital and Fillmore Station. Specifically, Goal 10.g focuses on "creat[ing] a node of activity and enhanced connections between Huntington Memorial Hospital and Fillmore Station through public plazas, wide sidewalks, street trees, and active ground floor uses." This goal is admirable but should be expanded to the entire district. For ArtCenter, we would like to see pedestrian improvements completed for the length of the western side of Raymond Avenue to eventually compliment the commitment ArtCenter has made in the Master Plan to enhance the eastern frontage. These enhancements will provide a seamless transition for people using the L Line and traveling to the South Campus, allowing for easier use of the proposed main quad and movement between Raymond Avenue and Arroyo Parkway. Further, the Draft Plan contemplates no pedestrian improvements to the southern side of East Glenarm Street, despite this being a major thoroughfare for students and requires crossing of the L Line tracks and 110 freeway (See Draft Plan Figure 3.2-4). ArtCenter requests the Draft Plan include a greater focus on these types of improvements and connections throughout the Specific Plan area.

III. Livable Community

During the entitlement process for ArtCenter's Master Plan the one item made clear by the City Council was that the South Campus must be integrated with the surrounding community. Frequently, the theme of creating a campus and not a fortress was referenced during the public approval process. ArtCenter has consistently embraced this concept with the hopes that the updated South Fair Oaks Specific Plan would be the catalyst for a livable community around the South Campus. ArtCenter students do not want to just live on campus. They want to be a part of a thriving community and accepted residents of Pasadena. The current Draft Plan will fall short of these goals.

By limiting height and density between Raymond Avenue and the west side of Arroyo Parkway, the Draft Plan ensures that the original goal of creating a robust and thriving community will not be accomplished. ArtCenter believe these streets should be in line with the Draft Plan's development standards for Fair Oaks. Fair Oaks proposes a height maximum of 63 feet (with height averaging of up to 75 feet). This immediately dips on Raymond Avenue to 51 feet (63 feet with averaging). The Draft Plan then calls for a maximum height of 48 feet (60 feet with averaging) on South Arroyo Parkway.³ This discrepancy completely ignores ArtCenter's South Campus and it's proposed buildings of up to 100 feet and new on-campus student resident population. We respectfully request that the areas south of Fillmore and north of Glenarm, along Raymond and Arroyo Parkway, have a maximum height of 63 feet (with height averaging up to 75 feet) in line with Fair Oaks.

³ See Draft Plan, Maps 6.1.2 and 6.1.3.



ArtCenter

This will provide for uniform standards and the flexibility needed for an evolving community, while not arbitrarily restricting development surrounding ArtCenter's South Campus.

Additionally, the Draft Plan prohibits residential on the west side of South Arroyo Parkway, despite a portion of South Arroyo being wedged between high density residential to the north near Fillmore Station and to the south at ArtCenter. Given the regional housing shortage and the goal of the Specific Plan to provide a sustainable market for local businesses, prohibiting all residential uses along the western side of Arroyo Parkway needlessly limits the viability of creating a true community. While ArtCenter understands the need for Arroyo Parkway to remain primarily a commercial corridor for Pasadena and step down in intensity as it nears the residential neighborhoods to the east, any long-term commercial success in the area will necessitate more residential. Further, the area directly surrounding the Fillmore station permits the highest residential densities (87 dwelling units per acre) within the district.⁴ Despite these expansive residential uses, the Draft Plan restricts all residential uses just one-block to the south of Fillmore station and for the entire eastern side of Arroyo Parkway. The Draft Plan should permit multi-family residential uses on the western frontage of Arroyo Parkway and establish a more gradual transition moving away from the Fillmore station. This transition would limit residential density while still providing the housing needed to support a thriving neighborhood. Without these modifications, the Specific Plan will continue to fail to provide significant and sustained change to this area of Pasadena.

Thank you for your work on the Specific Plan update and for considering these comments. ArtCenter would be happy to schedule a meeting with your staff to further discuss these comments and any other considerations regarding the Draft Plan at your earliest convenience. Please do not hesitate to reach me at Rollin.Homer@Artcenter.edu or 626-396-2292.

Respectfully,



Rollin Homer
Vice President, Facilities and Campus Planning
ArtCenter College of Design

cc: Justin Mahramas, Esq.
Holly Williams, Montgomery Clark Advisors

⁴ *Id.*

