



**City of South Pasadena
Planning and Community
Development Department**

Memo

Date: December 15, 2020

To: Chair and Members of the Planning Commission

From: Joanna Hankamer, Planning & Community Development Director

Re: Additional Document No. 1 for Item No. 5 – 2020 Annual Report and 2021 Work Plan

One (1) written public comment has been received for this item from the following person:

- Josh Albrektson

The written comment received is attached to this document

Joanna Hankamer

From: Josh Albrektson <[REDACTED]>
Sent: Tuesday, December 15, 2020 10:55 AM
To: PlanningComments
Subject: Item 5

Follow Up Flag: Follow up
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I just wanted to write out all the ways that the current housing plan from Placeworks violates the very clear laws and instructions from HCD so you guys are not surprised when the Housing Element is rejected in June and you have 4 months to do what you should have been doing the last 6 months. At the first meeting in May Placeworks said that we would have done the sites analysis by August, and yet the sites have yet to ever be shown to you guys. And today, in Item 4, you had an exercise that I cannot figure out what the purpose is as it relates to producing a housing element.

Sites Analysis Schedule

- » **Prepare Draft Sites Analysis (April-June)**
 - Understand existing conditions, future capacity, and opportunities to increase housing units
 - Prepare alternative scenarios to increase housing to meet RHNA
- » **Public review of Draft Sites Analysis (June)**
- » **Public review of Revised Sites Analysis to confirm consensus (August)**
- » **Policies and implementation will be shaped around the Site Analysis, with additional analysis through environmental review (August-November)**

Realistic development potential

For every site it is a requirement to estimate a realistic development potential. South Pasadena just claims 80% across the board. This is completely against the rules.

Watch the HCD webinar on the subject. This part is only 3 minutes long.
<https://youtu.be/pgcViMEA-Fo?t=1719>

This number is supposed to be based on recent developments. There have only been 3 approved developments in the past 20 years. The downtown plan has a upper limit of 50 DU/Acre. Mission Bell has 36 units with a DU/Acre of 50.7. The Senior housing project had a density bonus (which can't be counted for this) and had 86 units for a 31 DU/Acre. If you take out the 13 bonus units the DU/acre is 26.3 DU/acre. Seven Patios had 57 units for a DU/Acre of 31.

So based on only these three projects, the realistic development potential of about 65% at a maximum. But that is assuming that every lot in South Pasadena will be developed for housing.

The fact that commercial only projects can be developed on every one of the identified sites would lower the realistic development number significantly below 65%. The ability to turn the land into something other than housing must be included and calculated.

This is specifically discussed in the YouTube video here:

<https://youtu.be/pgcVjMEA-Fo?t=1874>

The fact that every site is on commercial corridors means that the realistic development potential must be lower than 65%.

Including sites that will not be turned into housing in 8 years

One of the sites identified in the Fair Oaks map was the Rite Aid Parking lot. Unless the Rite Aid building is included, the parking lot on it's own cannot be included. The businesses of that shopping center cannot function without its parking. That is specifically talked about in the following 30 seconds:

<https://youtu.be/pgcVjMEA-Fo?t=2093>

Pavillions is included as a possible site. South Pasadena design review board just had a meeting on November 5th about how Pavillions plans to completely renovate the building, spending millions of dollars. This land will not be turned into housing in 8 years and cannot be included.

ADUs

Remember when Placeworks claimed that South Pasadena could claim 1,000 ADUs based on instructions from HCD and Eureka?? And then they never mentioned Eureka again when I pointed out they are claiming 20 ADUs a year.

The following is from the 6/10 HCD memo the Placeworks claimed at the time allowed them to claim 1,000 ADUs.

Impact of New Accessory Dwelling Unit Laws

Since 2017, the Legislature has passed a series of new laws that significantly increase the potential for development of new ADUs and JADUs by removing development barriers, allowing ADUs through ministerial permits, and requiring jurisdictions to include programs in their housing element that incentivize their development. As a result, using trend analysis when estimating the potential for development may not accurately reflect the increased potential for these units. To account for this increased potential, HCD recommends the following options when performing this analysis:

- Use the trends in ADU construction since January 2018 to estimate new production. This is a conservative option to only account for the effect of the new laws without local promotional efforts or incentives (safe harbor option).
- Where no other data is available, assume an average increase of five times the previous planning period construction trends prior to 2018. This option is a conservative estimate based upon statewide data on ADU development since the implementation of the new laws (safe harbor option).
- Use trends from regional production of ADUs.
- Include programs that aggressively promote and incentivize ADU and JADU construction.
- Other analysis (reviewed on a case-by-case basis).

Listed number one is use production after 2018 to estimate new production. South Pasadena will produce under 20 ADUs this year. A requirement is that there has to be data and evidence to show that the ADUs are used for housing and not offices or pool houses. I doubt Placeworks has done this. The first two ADUs built in South Pasadena are being used for offices. Regardless, 20 ADUs per year for 8 years means South Pasadena can claim 160-200 ADUs, not 555.

Listed number 2 says **“WHEN NO OTHER DATA IS AVAILABLE.”** South Pasadena (and HCD for that matter) has the data on ADU production and it cannot use this method.

I’ve written out number 3 for you plenty of times.

Now Placeworks is claiming that they can completely ignore the guidelines above and get 555 ADUs based on Grover Beach and Morro Bay. Well, they are lying again. Morro Bay is claiming 23 ADUs a year based on the fact they permitted 23 ADUs in 2019. This is bullet point number one above. Grover Beach has 4,200 Single Family Homes and they are claiming 20 ADUs per year. South Pasadena has produced 15 ADUs this year, has 5,000 Single family homes, and Placeworks is saying that they can claim 75 ADUs a year. Ask Placeworks to write out their examples of Morro Bay and Grover Beach.

Half of you guys (and Amy from placeworks) watched the SCAG video where the head of policy for HCD mocked South Pasadenas claim of 1,000 ADUs.

Anyways, I wanted to write this out for you guys so that you are not surprised when the Housing Element gets rejected. These are very basic things that have been written out by HCD multiple times. None of the other cities in SCAG is trying to cheat like this and South

Pasadena will be an easy rejection. As I mentioned in my last letter, ask Placeworks to find a single example in SCAG of a city trying to claim as many ADUs as they are claiming South Pasadena can claim.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day