



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

Memo

Date: September 8, 2020

To: Chair and Members of the Planning Commission

From: Joanna Hankamer, Director of Planning and Community Development
Margaret Lin, Manager of Long Range Planning and Economic Development

Re: September 8, 2020, Planning Commission Meeting Item No. 3 Regional Housing
Needs Assessment Appeal - Public Comments Received

After posting of the staff report, public comments were received from one individual. These comments are included as Attachment 1.

Attachment: Public Comments Received

ATTACHMENT 1

Item #3: Regional Housing Needs Assessment
Appeal - Public Comments Received

**September 8, 2020, Planning Commission Meeting Agenda Item #3:
Regional Housing Needs Assessment Appeal - Public Comments Received**
(as of September 8, 2020, at 11:00AM)

1. Josh Albrektson* (<https://www.dropbox.com/s/nt5yzxh206a7hoj/RHNA%20Appeal%20-%20Voice%201.WAV?dl=0>)

*also provided a voicemail public comment that will be played for the Commission during the meeting

From: Josh Albrektson [REDACTED]

Date: September 7, 2020 at 4:55:58 PM PDT

To: PlanningComments <PlanningComments@southpasadenaca.gov>

Subject: General comments about RHNA how to quantify the amount give to South Pas

I wanted to point out how comparing 5th cycle numbers to 6th cycle numbers is not a valid comparison. Part of the reason housing has never been built is because in the past the coastal cities would force the RHNA numbers to the inland cities. Laws were changed so this could no longer happen. In the past San Marino had a RHNA number of 2. Newport beach had a number of 3. Beverly Hills had a number of 3. South Pasadena had a number of 63. This compares to places like San Bernardino and Riverside and Coachella having thousands.

So it is a complete disservice for planning and placeworks to present the numbers as a percentage increase compared to the 5th planning cycle. It really doesn't mean anything that San Marinos % increase is 19,800% while places like San Bernardino had a 200% increase. This is a completely misleading method of presenting the data.

The way the housing numbers SHOULD be presented when comparing cities is comparing the 6th cycle RHNA to current housing units or housing unit per population. Here is my data:

% increase is the $(\text{number of RHNA units}/\text{number of current housing units}) \times 100$. This tells you how many housing units are added compared to the number of housing units a city has.

Pop per housing unit is the population of the city/RHAN number. This tells you how many new homes each city is expected to provide based on their population.

As you can see from both of these numbers, South Pasadena is not that far off from every single city that touches Los Angeles.

| 42 | City | RHNA | Population | Housing units | % increase | Pop per HU |
|----|----------------|--------|------------|---------------|------------|------------|
| 43 | South Pasadena | 2061 | 25600 | 10893 | 18.92 | 12.42 |
| 44 | Pasadena | 9409 | 137000 | 60396 | 15.58 | 14.56 |
| 45 | San Marino | 398 | 13100 | 5051 | 7.88 | 32.91 |
| 46 | Alhambra | 6810 | 83000 | 31394 | 21.69 | 12.19 |
| 47 | San Gabriel | 3017 | 39718 | 13324 | 22.64 | 13.16 |
| 48 | Monterey Park | 5246 | 60200 | 21304 | 24.62 | 11.48 |
| 49 | Los Angeles | 455565 | 3792000 | 1474000 | 30.91 | 8.32 |
| 50 | Burbank | 8752 | 103000 | 43595 | 20.08 | 11.77 |
| 51 | Glendale | 13391 | 200000 | 77781 | 17.22 | 14.94 |
| 52 | West Hollywood | 3923 | 34000 | 25781 | 15.22 | 8.67 |
| 53 | Beverly Hill | 3096 | 34100 | 17744 | 17.45 | 11.01 |
| 54 | Culver City | 3332 | 38800 | 17371 | 19.18 | 11.64 |
| 55 | Santa Monica | 8874 | 89700 | 50901 | 17.43 | 10.11 |
| 56 | | | | | | |

People in South Pasadena always complain about how San Marino has a low number. That is because there are almost no jobs within 30 minutes of San Marino and there is no public transportation. With the new NextGen bus map there will be no bus stops in the city of San Marino. That compares to South Pas where we are 14 minutes to DTLA and with the regional connector 24 minutes to USC.

Feel free to play with the “Reach map” on the Next Gen bus plan.

<https://arellano.maps.arcgis.com/apps/MapSeries/index.html?appid=955582cec83e4677ad060e993acf61cc>

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Josh Albrektson MD
 Neuroradiologist by night
 Crime fighter by day

From: Josh Albrekton [REDACTED]
Date: September 7, 2020 at 4:53:39 PM PDT
To: PlanningComments <PlanningComments@southpasadenaca.gov>
Subject: Comments to go with my phone call

This is the data and more in depth writing about my phone call public comment. I am asking you guys to direct Planworks to start planning like you will get the 300 ADUs that South Pasadena would be lucky to get instead of the 1,000 ADUs that have been proven would be rejected. South Pasadena needs to plan for 1400 more homes than the zoning requires, and doing housing workshops and making plans pretending it doesn't is a huge disservice to you and the people of South Pasadena.

ADU specific comments

A lot of time was spent talking about parking at the last meeting for no reason. The state laws are very specific. There are no parking standards for any ADU within one half mile walking distance of ANY bus stop. That means there are only three places that South Pasadena can mandate parking. The northwest portion of the city above the 110, the high portions of Monterrey Hills, and a small area where Garfield meets Monterrey.

I think the ADU amnesty program is a great idea. It is such a great idea that State Senator Wieckowshi who represents Fremont proposed a law, SB 13, that does just this. It was signed in October 2019 and is now the law of the land. This law allows anybody who has an illegal ADU to legalize it without the city fining them for anything not up to standards (They have to fix that of course).

The two examples above are things proposed by Placeworks as their "Aggressive ADU" ordinances that have been legal for the past 9 months and part of the reason South Pasadena will not get significantly more ADUS than the normal amount allowed (which is about 250 ADUs). There is almost nothing proposed in the ADU plans that Los Angeles city already does.

The policy of allowing two ADUs of a Duplex and ADU in a single family zone is a good idea, but I doubt that there are many people who would do this. They already have the ability to do an ADU and jADU by right without the affordability, and there are not many lots big enough in South Pas to have two ADUs and a garage.

Here is the HCD memo on ADUs if you want to read more..

https://www.hcd.ca.gov/community-development/housing-element/docs/ADU_TA_Memo_Final_01-10-20.pdf

Bullet point 14 is the great idea about amnesty.

And here is the HCD building blocks page which is very informative:

<https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/accessory-dwelling-units.shtml>

Inclusionary housing ordinance specific comments

At the July 21st meeting there was a discussion about inclusionary zoning. It was presented that inclusionary zoning could happen at levels from 20-30%. This is pretty close to illegal. HCD only allows IHOs to 15% and anything above that needs a significant economic analysis showing that high numbers are still feasible. This is basically just for cities that already have a 15% inclusionary zoning and are building enough housing that they can go higher. South Pasadena does not fall into the category of a place that is building enough housing. I'm glad to see this was fixed in the subsequent meeting.

July 21st meeting at 1:09

https://www.spectrumstream.com/streaming/south_pasadena_pc/2020_07_21.cfm

And the HCD memo on IHO. It provides a good outline and you guys should read it:

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/AB_1505_Final.pdf

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

From: Josh Albrekton [REDACTED]
Date: September 7, 2020 at 4:25:51 PM PDT
To: PlanningComments <PlanningComments@southpasadenaca.gov>
Subject: RHNA Appeals comment 9/8 Planning meeting

The laws were made specifically to make South Pasadena have the RHNA numbers they do, and the laws were also made to be sure that South Pasadena will lose any appeal they make. I attended the SCAG appeals workshop and have followed it closely. I would apply to be on the committee, but I don't think the fact I know it would fail would make me a good member of a committee trying to find a way to make it work. If either of the two members who end up on the ad hoc committee want to talk to me about it, I can give you a very in depth discussion about the laws, changes, and why the appeal will fail.

Here is some useful information for the planning commission and whoever makes up the appeals process team:

This is the SCAG workshop on the appeals process from Feb 3rd. You can see me at this workshop sitting by the window at the 38 minute mark:

<https://www.youtube.com/watch?v=EjtvYEBmaA>

Here is the powerpoint presentation:

http://www.scag.ca.gov/programs/Documents/RHNA/RHNA020320_AppealWorkshopPresentation.pdf

Here is the discussion about how the RHNA numbers were divided up. First is a good speech from Assembly Leader Anthony Rendon about housing, which is worth listening on your own. At 30 minutes you can hear the staff talk about the RHNA allocation method.

<http://scag.igm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=2059&Format=Agenda>

Here is the latest RHNA video from Pasadena. You should watch it even if you are not interested in the appeals:

https://pasadena.granicus.com/MediaPlayer.php?view_id=35&clip_id=5028

At ~22 minutes they talk about the appeals process. Pasadena does not believe they have a basis for an appeal and they probably will not launch an appeal unless something happens.

Earlier in the meeting they also mention that they should be able to meet their RHNA numbers without rezoning. My friend on the Alhambra PC also said they have been told they already have the zoning for their numbers. It is a common but wrong belief by people in South Pasadena that every city is having the same problems at fitting their RHNA in their zoning. That is not at all accurate and if we are the only one who doesn't turn in a compliant housing element we will be the only one punished.

Information on the 4 cities that appealed their RHNA numbers in San Diego. Only Coronado which complained about the military base was counted had their numbers "won" and had their RHNA reduced from 1,000 to 912.

<https://www.delmartimes.net/news/story/2020-06-29/sandag-rejects-solana-beach-appeal-over-state-housing-mandate>

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