



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

Memo

Date: February 23, 2021

To: Chair and Members of the Planning Commission

From: Joanna Hankamer, Planning & Community Development Director

Re: Additional Document No. 2: Public Comments on Item #3

One (1) written public comments was received on Item #3 from the following and is attached to this document:

- Josh Albrektson

An audio comment was also received from Josh Albrektson on this item and will be played at the hearing.

Elizabeth Bar-El

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Monday, February 22, 2021 5:15 AM
To: PlanningComments
Subject: Item 3, Planning Commission Feb 23rd

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Design standards versus design guidelines.

Bottom of page 9 of the ADU handbook discusses design standards:
https://www.hcd.ca.gov/policy-research/docs/adu_december_2020_handbook.pdf

The express intent of these laws is to have ADU approval based on written objective rules that are indisputable and not subject to interpretation. These standards MUST be objective and each ADU application can really be approved with checkbox questions.

Does it have wood?? Yes. Are the windows above 5 feet?? Yes. Is it 10 feet from other structures?? Yes. Etc. etc.

Here is the definition of objective from the ADU Handbook:

What does objective mean?

“objective zoning standards” and “objective design review standards” mean standards that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal. Gov Code § 65913.4, subd. (a)(5)

ADUs are absolutely not able to be judged on subjective measures.

Listen how Liz Bar-EL described the “Objective” standards for historic properties:

<https://youtu.be/3kgBqavx1qE?t=2388>

“Materials must be the same to maintain the integrity of the historic structure”

“Must be differentiated as not to convey false sense of history”

“Must not overwhelm or impact the defining characteristics of the historic structure”

She literally said “these objective standards”

But the kicker is that she says the applicant “MUST PROVIDE A NARRATIVE TO EXPLAIN HOW THE PROPOSED DESIGN OF THE ADU MEETS THOSE REQUIREMENTS”

If you have to write an essay for “Objective design standards” then those standards are not at all objective.

This makes me really question if the staff really knows what objective is. Or if they know what the ministerial review required by law actually is.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day