City of South Pasadena
2021-2029 HOUSING ELEMENT

SUMMARY OF CHANGES – DRAFT AMENDED HOUSING ELEMENT FEBRUARY 2026

This Draft Amended Housing Element (February 2026) directly responds to the direction of the City's ballot measure to adopt higher height limits in specified areas of the City to accommodate the higher densities needed to meet the City's Regional Housing Needs Assessment of 2,067 units. At the same time, the Draft Amended Housing Element reflects and responds to the correction of calculation errors related to anticipated capacity in the previous Element by adjusting the sites inventory to remove certain areas generally populated by naturally occurring affordable housing. Therefore, the amendments in this Housing Element are limited to discussions of the recent public engagement process, specific programs related to the sites inventory, the Land Resources section, and Appendix A (Sites Exhibits). Other aspects of the Housing Element are continuing to be implemented per the terms of the certified Element, but the Element itself is not being updated/amended to reflect those actions. Those issues are covered in annual reports, and will be revisited when the Housing Element for the next cycle is prepared.

The following changes listed below have been made to the Housing Element. In the Housing Element, changes made for the August 2025 Draft are in red and changes made for the February 2026 Draft are in purple.

- Any mention of the Housing Element public engagement process (in the Housing Element document and Appendix B) has been updated to include mentions of the most recent engagement efforts. pp. 5, 42, 43, 44, 85, Appendix B B1-18 – B1-20, Appendix B B1-35
- Program language for the following programs was amended in the "Summary of Housing Programs for the 2021-2029 Housing Element" table and "Housing Plan and Quantitative Objectives" section: "Program 2.n – Citywide Height Limit Ballot Initiative, Program 3.a – Rezone and Redesignate Sites to Meet RHNA, Program 3.b – Mixed-Use Developments and Adaptive Re-Use". pp. 21, 22, 276-277, 278
- Removal of "Programs 2.j – General Plan Affordable Housing Overlay" and "2.k – Affordable Housing Overlay Zone." The removal of these two programs was agreed upon with HCD but not implemented in the previous Housing Element. The Affordable Housing Overlay is not required to meet the City's RHNA. pp. 18, 60, 91, 103-104, 108, 134, 145, 162, 205, 206, 273-274
- Updated "Table VI-44 (formerly Table VI-52) Comparison of Site Capacity and RHNA". p. 179
- Added new category of sites to meet the City's RHNA, entitled and pipeline/pending sites. Includes new text and new "Table VI-45 Entitled and Pipeline Projects", including edits to the table. p. 181
- Edited methodology categories text to reflect updated methodology reflected in the new site capacity analysis. This includes the "Available Sites", "Vacant Sites in Single-Family Residential Zones", "Other High-Density Sites", "Additional Capacity Through Rezoning". pp. 183, 184, 214-215, 241-242

- Minimal edits to "Table VI-46 (formerly Table VI-44) Vacant Sites That Allow Residential Development for Moderate and Above-Moderate" and "Table VI-50 (formerly Table VI-48) Representative Projects on Non-Vacant Sites in South Pasadena". pp. 188, 201-202
- Updated 2025 analysis regarding ADU capacity expected during the 2021-2029 Housing Element cycle. p. 196
- Updated "Table VI-52 (formerly Table VI-50) Sites Suitable to Address the Lower-Income RHNA" to turn some former suitable sites into entitled or pipeline sites. Adjusted capacity of Suitable Site 9 down as part of the site is now within the DTSP MUC 50 du/ac zone, instead of the full site being classified as DTSP MUC 70 du/ac. pp. 208-209
- Updated "Table VI-53 (formerly Table VI-51) Other Redevelopment Sites Anticipated Capacity Analysis" based on updated methodology. pp. 216-239
- In Appendix A, the "Citywide Sites Inventory Map" section was updated with new maps reflecting the updated site inventory. pp. A1-2 – A1-17
- In Appendix A, the suitable site tables were updated to reflect all changes in "Table VI-52 Sites Suitable to Address the Lower-Income RHNA". pp. A1-38 – A1-52
- In Appendix A, adjusted capacity of Suitable Site 9 down as part of the site is now within the DTSP MUC 50 du/ac zone, instead of the full site being classified as DTSP MUC 70 du/ac. pp. A1-46

Changes for the August 2025 draft have been marked in red, with **bold underline** for additions and ~~strikethrough~~ for deletions. Changes for the February 2026 draft have been marked in purple, with **bold underline** for additions and ~~strikethrough~~ for deletions. Where an entire table has been updated, only the title and/or a note at the top of the table is colored red to denote the new or replaced table.

Section	Page Number(s)	Description of Change
6.1 Executive Summary	4-5	Summary of changes that have been made to the Housing Element, for the draft amended version finalized in August 2025.
6.1 Executive Summary	5	Added text discussing recent community engagement efforts undertaken as part of the Housing Element process. Discusses the successful ballot initiative, outreach events, and study sessions.
6.1 Executive Summary	18	Removed programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone. Per the last adopted Housing Element, the Affordable Housing Overlay is not required to meet the City's RHNA.
6.1 Executive Summary	21	Edit to Program 2.n – Citywide Height Limit Ballot Initiative to reflect the passage of the ballot measure and inform about the language of Measure SP.
6.1 Executive Summary	21-22	Removing language from Program 3.a - Rezone and Redesignate Sites to Meet RHNA, such as lowering the density of the DTSP FOC from 110 du/ac to 90 du/ac. Adding "and on large, underutilized sites" language.
6.1 Executive Summary	22	Removing language from Program 3.b - Mixed-Use Developments and Adaptive Re-Use to reduce densities in the DTSP zone from 70 to 110 du/ac down to 50 to 90 du/ac.
6.2 Introduction	42-44	Added text discussing recent community engagement efforts undertaken as part of the Housing Element process. Discusses the successful ballot initiative, town halls, open houses, listening sessions, walking tours, Planning Commission subcommittee, and a joint City Council and Planning Commission study session.
6.3 Housing Needs Assessment	60	Removal of mentions of programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone.
6.4 Fair Housing Assessment	83	Mention of Measure SP and Measure SP implementation.
6.4 Fair Housing Assessment	85	Addition of text directing readers to Section 6.2.4 of the Housing Element for more detailed information on the outreach undertaken for the Housing Element in 2024 and 2025.
6.4 Fair Housing Assessment	91	Removal of mentions of programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone.
6.4 Fair Housing Assessment	103-104, 108, 134	Removal of mentions of programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone.
6.5 Housing Constraints	145	Removal of mentions of program 2.j – General Plan Affordable Housing Overlay.

Section	Page Number(s)	Description of Change
6.6 Housing Development Resources	162	Removal of mentions of programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone.
6.6 Housing Development Resources	179	Updated Table VI-44 Comparison of Site Capacity and RHNA to reflect the updated capacity based on changes to methodology. The "Entitled and Pipeline Sites" category is completely new to this table.
6.6 Housing Development Resources	180	Clarifying text added to the Constructed Units section, regarding the income level of the units. New section of text introducing the site category for Entitled and Pipeline/Pending Units. 2026 Update: Added text to Entitled Pending Units portion, including more information on building permits. Added information about conditions of entitled and pending sites.
6.6 Housing Development Resources	181	New table listing all entitled and pipeline sites that are being counted towards the RHNA. 2026 Update: Added additional updated information on certain entitled and pipeline sites.
6.6 Housing Development Resources	183	Addition of text in the Available Sites section, clarifying the new methodology for the site capacity. Removal of methodology text that no longer applies. Additional housing capacity is targeted for the following areas: Downtown Specific Plan, a Mixed-Use Overlay on parcels zoned CG, CO and BP, and Housing Opportunity Overlay on certain parcels zoned RH. 2026 Update: Removed mentioned to of the Institutional Housing Overlay.
6.6 Housing Development Resources	183-184	Addition of text related to methodology for vacant sites in the City's single-family residential zones. These sites are located within the Altos de Monterey Residential (AM), Residential Estate (RE), and Residential Low-Density (RS) zoning districts.
6.6 Housing Development Resources	184-185	Removal of methodology text that is no longer relevant.
6.6 Housing Development Resources	188	Amendment of the general plan land use category and zoning for some parcels in Table VI-46 Vacant Sites That Allow Residential Development for Moderate and Above-Moderate
6.6 Housing Development Resources	194	Additional text added to the Accessory Dwelling Unit Potential section, including updated ADU building permit counts from 2022-2024.
6.6 Housing Development Resources	196	An updated analysis of Accessory Dwelling Unit Potential for the August 2025 Housing Element. This updated analysis finds a 2021-2029 projected ADU capacity of 390 units.

Section	Page Number(s)	Description of Change
6.6 Housing Development Resources	198	Removal of Market Trends text.
6.6 Housing Development Resources	201-202	Updating of text in Table VI-50 Representative Projects on Non-Vacant Sites in South Pasadena to match the most recent City knowledge on the status of these projects. Addition of Carrows site project.
6.6 Housing Development Resources	205	Removal of mentions of programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone.
6.6 Housing Development Resources	206	Removal of mentions of the Affordable Housing Overlay Zone. Small text addition. Removal of mentions of programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone.
6.6 Housing Development Resources	208-209	Entire Table VI-52 Sites Suitable to Address the Lower-Income RHNA updated to turn some former suitable sites into entitled or pipeline sites, such as sites 3, 10, 11, and 14. Adjusted capacity of Suitable Site 9 down as part of the site is now within the DTSP MUC 50 du/ac zone, instead of the full site being classified as DTSP MUC 70 du/ac.
6.6 Housing Development Resources	214-215	Addition of methodology text for the "Other High-Density Sites" category to meet the RHNA. Completely new addition.
6.6 Housing Development Resources	216-239	Entire Table VI-53 Other Redevelopable Sites Anticipated Capacity Analysis renamed and updated to reflect the new methodology in Section 6.6. These sites do not include suitable sites or entitled/pipeline sites. A total line has been added at the bottom of Table VI-53.
6.6 Housing Development Resources	241-242	Removal of text from the Additional Capacity Through Rezoning section that is no longer relevant. No longer reflective of the Housing Element's current methodology.
6.6 Housing Development Resources	242	Removal of Comparison of Site Inventory with RHNA section text. This text and table have been replaced by Table VI-44.
6.8 Housing Plan and Quantified Objectives	273-274	Removal of mentions of programs 2.j – General Plan Affordable Housing Overlay and 2.k – Affordable Housing Overlay Zone.
6.8 Housing Plan and Quantified Objectives	276-277	Removal of text related to Program 2.n – Citywide Height Limit Ballot Initiative that is no longer relevant. Edit to Program 2.n – Citywide Height Limit Ballot Initiative to reflect the passage of the ballot measure and inform about the language of Measure SP. 2026 Update: Text added regarding the City adopting new height limits by February 2027.

Section	Page Number(s)	Description of Change
6.8 Housing Plan and Quantified Objectives	278	Removing language from Program 3.a - Rezone and Redesignate Sites to Meet RHNA, such as lowering the density of the DTSP FOC from 110 du/ac to 90 du/ac. Adding "and on large, underutilized sites" language.
6.8 Housing Plan and Quantified Objectives	278	Removing language from Program 3.b - Mixed-Use Developments and Adaptive Re-Use to reduce densities in the DTSP zone from 70 to 110 du/ac down to 50 to 90 du/ac.
6.8 Housing Plan and Quantified Objectives	283	2026 Updates: Program 3.g: Change to the frequency in tracking the affordability of ADUs. Program 3.h: Text added about pre-approved ADU prototypes, timeline text added.
6.8 Housing Plan and Quantified Objectives	287-288	2026 Updates: Program 3.o: Text added to track development of entitled and pipeline units, timeline text added.
Appendix A: Sites Exhibits	A1-1	Removal of two mentions of unnecessary maps.
Appendix A: Sites Exhibits	A1-2 – A1-17	Addition of new updated site inventory maps, matching the capacity tables in the Housing Element.
Appendix A: Sites Exhibits	A1-18 – A1-37	Removal of old site inventory maps that are no longer accurate.
Appendix A: Sites Exhibits	A1-38	Edit to title for suitable sites exhibits. Only including sites suitable to accommodate the lower income RHNA.
Appendix A: Sites Exhibits	A1-39	Clarification for Site 2, entire capacity of site is not assumed.
Appendix A: Sites Exhibits	A1-40	Removal of site 3 from suitable sites list. It is now a pipeline site, included in the Housing Element Table VI-45 Entitled and Pipeline Projects.
Appendix A: Sites Exhibits	A1-42	Clarification regarding density assumed on site 5. Density assumed on the site is lower than the max allowed due to the site's unusual shape.
Appendix A: Sites Exhibits	A1-45	Amendments to site 8's proposed zoning, general plan land use, and density.
Appendix A: Sites Exhibits	A1-46	Amendments to site 9's proposed zoning and general plan land use. Adjusted capacity of Suitable Site 9 down as part of the site is now within the DTSP MUC 50 du/ac zone, instead of the full site being classified as DTSP MUC 70 du/ac.

Section	Page Number(s)	Description of Change
Appendix A: Sites Exhibits	A1-47	Removal of site 10 from suitable sites list. It is now a pipeline site, included in the Housing Element Table VI-45 Entitled and Pipeline Projects.
Appendix A: Sites Exhibits	A1-48	Removal of site 11 from suitable sites list. It is now a pipeline site, included in the Housing Element Table VI-45 Entitled and Pipeline Projects.
Appendix A: Sites Exhibits	A1-49	Amendments to site 12's proposed zoning, general plan land use, density, and realistic/net units.
Appendix A: Sites Exhibits	A1-50	Amendments to site 13's proposed zoning, general plan land use, density, and realistic/net units.
Appendix A: Sites Exhibits	A1-51	Removal of site 14 from suitable sites list. It is now a pipeline site, included in the Housing Element Table VI-45 Entitled and Pipeline Projects.
Appendix A: Sites Exhibits	A1-52	Addition of text related to site study conducted for the site to determine capacity. Amendments to site 15's proposed zoning, general plan land use, and density.
Appendix B: Summary of Public Participation	B1-18 – B1-20; B1-35	Addition of detailed information regarding recent public engagement efforts undertaken throughout the Housing Element process. These efforts include a ballot measure SP town hall, a ballot measure SP open house, two community listening sessions, two walking tours, two open houses, two study sessions, four Planning Commission meetings, and one Planning Commission Community Meeting.

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City of South Pasadena
2021-2029 HOUSING ELEMENT

6.1 EXECUTIVE SUMMARY

A New Approach to Increased and Inclusive Housing Production

The 2021-2029 housing element cycle for the Southern California region departs significantly from past housing element cycles, with additional State requirements to boost housing production and provide more affordable housing units. Accordingly, this housing element update for the City of South Pasadena has some important additions to address the City's obligation to plan for its share of the regional housing need. This update introduces new policies and programs consistent with State law based on a comprehensive, inclusive strategy to encourage housing production and retention to serve the entire community. The eight-year term of this housing element is not a finite goal; rather, it is the beginning of a continuum during which the policies contained herein will set a course for a longer period over which housing will be prioritized for households of all income, particularly those who need support to afford the high cost of living in the city.

This housing element includes strategies and programs designed to accommodate the development of 2,067 units as allocated in the Southern California Association of Government's (SCAG) Regional Housing Needs Allocation (RHNA).

Preservation of existing housing continues to be a fundamental goal for the City of South Pasadena. Preserving housing supports sustainability objectives and it is also less expensive to create affordable units in existing housing stock. It will be important to find those opportunities in the coming years. However, to accommodate the RHNA, the City must determine policies and zoning thresholds that allow and encourage production of new housing units in a manner that South Pasadena has not contemplated in the past. The multi-pronged strategy that this housing element relies on includes inclusionary housing requirements that Council adopted in 2020, encouragement for Accessory Dwelling Units (ADUs), with simpler, objective requirements, and rezoning for higher density and mixed-use commercial/residential development. The rezoning of non-residential parcels to allow densities that support and encourage both market rate and affordable housing units will follow the adoption of a revised General Plan Land Use Element together with the Downtown Specific Plan, an update and expansion of the 1996 Mission Street Specific Plan.

The role of ADUs is also more prominent in this housing element than the previous cycle. While ADUs have been part of the housing mix for several years, they were not permitted on most single-family parcels until the 2020 Zoning Code update. ADUs are particularly important in South Pasadena because of the large amount of land zoned and developed for single-family housing and the built out nature of the city overall, with a lack of available vacant land for new construction. ADUs are also permitted on multi-family properties, but it is the strong single-family homeowner interest in ADUs that is expected to drive construction of these units in the next eight years and promote widespread distribution of new housing across all parts of the city.

New State Housing Legislation

The governor signed significant housing bills in recent years, including SB 8, SB 9, SB 10, and SB 381 in 2021, and AB 2011 and AB 2097 in 2022. The City anticipates that the expanded development potential that the state has offered through this legislation will likely result in additional units in some single-family neighborhoods, which would contribute toward housing element implementation, as reported annually to HCD.

SB 8 is a follow-up to SB 330, also known as the Housing Crisis Act of 2019, which took effect on Jan. 1, 2020, and was set to expire in 2025. SB 330 streamlines the creation of housing in jurisdictions and allows developers to submit a preliminary application on a form developed by HCD ahead of providing the full amount of information required by the local government for a housing development application. Upon submittal of a pre-application and payment of the permit processing fee, a housing developer is allowed to "freeze" the applicable fees and development standards that apply to their project while they assemble the rest of the material necessary for a full application submittal. SB 8 now extends SB 330's applicability to 2030. South Pasadena processes SB 330 pre-applications as required by State law, and this bill does not impact preparation of the housing element.

SB 9, which went into effect in January 2022, has potentially significant implications for housing development in California, and particularly in the City of South Pasadena due to the high number of single family lots already in existence. This bill allows development of two units on single-family properties, and allows these lots to be sub-divided into two parcels, each of which may then have two units and rights to build ADUs as already allowed by State law. Properties located within a half-mile of transit are exempt from providing parking for these units, and many single-family properties in the City of South Pasadena would qualify for that exemption. Developments on properties that are not within this proximity to transit would need to provide one on-site space per unit. The City will need to clarify and provide information for the community regarding properties located in the City's many historic districts to which the new provisions do not apply. The annual progress report (APR) will document the number of duplex developments approved and constructed over the coming years to provide an understanding of the reaction to this new opportunity.

SB 10 creates a voluntary process for local governments to access a streamlined zoning process for new multi-unit housing near transit or in urban infill areas, with up to 10 units per parcel, without need for California Environmental Quality (CEQA) analysis. Given the ongoing provisions of SB 330, extended by SB 8, it may be advantageous for South Pasadena to utilize these provisions for rezoning, in conjunction with objective design standards. However, much more analysis, consideration and public involvement would be required to determine if SB 10's provisions are appropriate for South Pasadena. Program 3.m has been added to implement SB 9 and to explore options pursuant to SB 10.

Additionally, Senate Bill 381 (SB 381) was signed into law in September 2021, which relates specifically to surplus residential properties owned by the California Department of Transportation (Caltrans) located in South Pasadena. SB 381 creates a new priority order for the sale of surplus properties located in the City of South Pasadena through Caltrans' existing SR 710 Affordable Sales Program. SB 381 requires that Caltrans offer occupied homes to the current tenants of the homes. If those tenants are lower or moderate (up to 150% AMI) income households, the homes shall be offered at a price affordable to the tenants. If those tenants are above moderate income (above 150% AMI), the homes shall be offered at a fair market price. SB 381 requires that Caltrans offer

unoccupied homes in South Pasadena for sale to the City of South Pasadena. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE). State law requires Caltrans to place a deed restriction on the unoccupied surplus properties without a historic designation, ensuring that they are made available for purchase by moderate-income households or for rent to lower income households. SB 381 allows for the City to sell the unoccupied surplus properties that do have a historic designation at fair market value with the accompany requirement that the City use the proceeds of the sales to finance the production or acquisition of three affordable units for every historic property sold.

AB 2011, the Affordable Housing and High Road Jobs Act of 2022, was signed into law on September 28, 2022. AB 2011 allows for ministerial, by-right approval of affordable housing on commercially-zoned lands, and allows for mixed-income housing along commercial corridors so long as the project meets certain labor and environmental criteria.

AB 2097 was signed into law on September 22, 2022. AB 2097 removes parking requirements for new developments located within a half-mile of a major transit stop as defined in Section 21155 of the Public Resources Code. This provision is being incorporated into the South Pasadena Municipal Code along with other amendments for State law consistency.

The Public Outreach Process

The South Pasadena community began an ongoing discussion about future land use and transportation decisions that would affect the community in 2017 through the General Plan and DTSP planning processes. On March 21, 2018, the City Council held a study session on pending State affordable housing bills, the City's housing element compliance, and a Keyser Marston Associates report that introduced options for regulatory tools to respond to state affordable housing mandates. The City Council requested that inclusionary housing issues be included in future public outreach on housing policy. The overlap of these policies with the General Plan/DTSP was recognized, causing a shift in the approach to land use policy, the planning process and the public discussion.

As the 6th Cycle Housing Element got underway in January 2019, the Planning Commission approved a community outreach strategy. Following release of a Draft General Plan and DTSP, based on development that preceded the State's intention to determine RHNA numbers that were much higher than in the past, the planning process was put on hold in order to align these inter-related general plan elements.

From the outset, it was clear that the housing element update needed to be approached as a broader discussion about housing initiatives that would be needed to develop a housing element that would comply with State certification criteria. Meetings to inform and involve the community about the housing element and related initiatives commenced in the spring of 2020 (see Appendix B). These meetings were held in an on-line format due to restrictions imposed by COVID-19 pandemic emergency orders. The Planning Commission hosted numerous subsequent study sessions on the housing element, with opportunities for public input. Staff also presented updates to Council on a regular basis, as well as public hearings to adopt South Pasadena's first inclusionary housing ordinance (South Pasadena Municipal Code (SPMC) 36.375) and to revise the ADU provisions in the zoning code. Public meetings on inclusionary housing and ADUs consistently connected the relationship of

these initiatives to the wider housing element strategy. Planning Commission study sessions and public hearings of the Commission and Council for recommendation and adoption provided multiple opportunities for public involvement. The Planning Division received written comments from community members and housing advocacy groups related to the housing element and to the zoning ordinance changes. These public comments resulted in several meaningful modifications to the final ordinances.

2025 Amendment

This Draft Amended Housing Element (July 2025) directly responds to the direction of the City's ballot measure to adopt higher height limits in specified areas of the City to accommodate the higher densities needed to meet the City's Regional Housing Needs Assessment of 2,067 units. At the same time, the Draft Amended Housing Element reflects and responds to the correction of calculation errors related to anticipated capacity in the previous Element by adjusting the sites inventory to remove certain areas generally characterized by naturally occurring affordable housing. Therefore, the amendments in this Housing Element are limited to discussions of the recent public engagement process, specific programs related to the sites inventory, the Land Resources section, and Appendix A (Sites Exhibits). Other aspects of the Housing Element are continuing to be implemented per the terms of the certified Element, but the Element itself is not being updated/amended to reflect those actions. Those issues are covered in annual reports, and will be revisited when the Housing Element for the next cycle is prepared.

The following changes have been made to the Housing Element, for the draft amended version released for public review on July 10th, 2025:

- **Any mention of the Housing Element public engagement process (in the Housing Element document and Appendix B) has been updated to include mentions of the most recent engagement efforts.**
- **Program language for the following programs was amended in the "Summary of Housing Programs for the 2021-2029 Housing Element" table and "Housing Plan and Quantitative Objectives" section: "Program 2.n – Citywide Height Limit Ballot Initiative, Program 3.a – Rezone and Redesignate Sites to Meet RHNA, Program 3.b – Mixed-Use Developments and Adaptive Re-Use"**
- **Removal of "Programs 2.k – General Plan Affordable Housing Overlay" and "2.k – Affordable Housing Overlay Zone." The removal of these two programs was agreed upon with HCD but not implemented in the previous Housing Element. The Affordable Housing Overlay is not required to meet the City's RHNA.**
- **Updated "Table VI-44 Comparison of Site Capacity and RHNA"**
- **Added new category of sites to meet the City's RHNA, entitled and pipeline/pending sites. Includes new text and new "Table VI-45 Entitled and Pipeline Projects."**
- **Edited methodology categories text to reflect updated methodology reflected in the new site capacity analysis. This includes the "Available Sites", "Vacant Sites in Single-Family Residential Zones", "Other High-Density Sites", "Additional Capacity Through Rezoning"**
- **Minimal edits to "Table VI-46 Vacant Sites That Allow Residential Development for Moderate and Above-Moderate" and "Table VI-50 Representative Projects on Non-Vacant Sites in South Pasadena"**
- **Updated 2025 analysis regarding ADU capacity expected during the 2021-2029 Housing Element cycle.**

- **Updated "Table VI-52 Sites Suitable to Address the Lower-Income RHNA" to turn some former suitable sites into entitled or pipeline sites.**
- **Updated "Table VI-53 Other Redevelopment Sites Anticipated Capacity Analysis" based on updated methodology**
- **In Appendix A, the "Citywide Sites Inventory Map" section was updated with new maps reflecting the updated site inventory.**
- **In Appendix A, the suitable site tables were updated to reflect all changes in "Table VI-52 Sites Suitable to Address the Lower-Income RHNA".**
- **Adjusted capacity of Suitable Site 9 down as part of the site is now within the DTSP MUC 50 du/ac zone, instead of the full site being classified as DTSP MUC 70 du/ac.**

Changes have been marked in redline, with bold underline for additions and bold strikethrough for deletions. Where an entire table has been updated, only the title and/or a note at the top of the table is colored red to denote the table is new.

Outreach for the 2025 Amendment

The certified Housing Element presumed that some level of increased building height in excess of the City's current height limit would be needed to achieve the minimum densities allowed to ensure adequate capacity for housing. The key program to ensure this capacity was Program 2.n – Citywide Height Limit Ballot Initiative. In order to ensure community engagement with the purpose and significance of the initiative, the Council authorized a robust public outreach process for its development. This process began in June 2024, and continued through the election period with information provided to voters.

After passage of the initiative, an intensive outreach process was undertaken to engage the community in regard to developing proposed height and development standards to support the densities to which several districts had been rezoned since the adoption of the Housing Element. Given the timeline for implementing Program 2.n, the program included events with multiple formats in January and February 2025, as well as study sessions in March and April. Additionally, multiple Planning Commission hearings were held during the months of April, May and June. A final community meeting hosted by the City and the Planning Commission was held on June 16th, 2025. Sub-section 6.2.4 – Public Participation has been updated with additional details about this outreach process.

Quantified Objectives

The housing plan includes quantified objectives for housing preservation and rehabilitation, as required by State law. The table below summarizes the quantified objectives, which are consistent with the City's RHNA allocation and other housing program goals.

Table VI-1
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED	REHABILITATED
Extremely Low/ Very Low Income	757	7	8
Low Income	398	24	8
Moderate Income	334	4	9
Above Moderate	578	6	10
Total	**2,067**	**41**	**35**

1. Note that no housing units have been identified as at risk of conversion to market rate in South Pasadena within 10 years of the beginning of the 6th-cycle planning period, however there are preservation and rehabilitation needs in the community; therefore, units have been included in both columns.

Summary of the Housing Plan

Table VI-1 lists all of the Housing Element programs, summarizing the housing plan that is presented in detail in Section 6.8. The housing programs are grouped by the five goals, which represent the five major areas as required for housing elements by of the Government Code Section 65583. For the objectives and policies associated with the programs, please see Section 6.8.

Table VI-2
SUMMARY OF HOUSING PROGRAMS FOR THE 2021-2029 HOUSING ELEMENT

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Goal 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.				
Program 1.a - Energy Efficiency The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.	Ensure consistency with State green building standards triennially when the California Building Code is adopted.	General Fund; grants	Community Development Department, Public Works Department	Every three years; next building code adoption expected in 2023.
Program 1.b - Convert Caltrans Homes to Affordable Housing The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB381 that respond to the cost constraints of particular properties.	Acquire and convert unoccupied, Caltrans-owned properties, that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas. Maximixe the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.	General Fund; HRE; public (federal, state, regional) grants, loans and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)	Caltrans; Community Development Department/City Manager's Office	Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State; target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
SB 381 allows the City to sell identified historic homes at fair market value, but requires that the City use the proceeds from the sale to provide three affordablue units for each home sold at fair market value. Additionally, if the City purchases non-historic surplus properties from Caltrans, SB 381 provides the City the option to sell the properties to moderate or lower income households, or rent the properties to lower income households. Additionally, the City may consider the construction of additional units, either as ADUs or Missing Middle housing, on certain parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.				

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 1.c - Housing Rehabilitation and Code Enforcement The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions in the Southwest Monterey Hills neighborhood and other neighborhoods with the oldest housing stock identified in the 2022 survey (Table VI-26), or as subsequently identified, to reduce displacement risk of tenants living in currently substandard housing. The City will continue to monitor opportunities and pursue funds annually, as available, through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies. To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge.	Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.	HOME, SB 2 PHLA, program fees collected by covered rental property owners, others	Community Development Department/ City Manager's Office	Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. Propose Rental Housing Inspection Program to City Council by October 2024.
Program 1.d – Assisted Housing Unit Preservation The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that the City has not been tracking any affordable housing units with deed-restrictions and/or subsidized funding. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions: ▪ Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to	Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.	General Fund	Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
incentivize long-term affordability. ▪ If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources. Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives. If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing. When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.				

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 1.e – Environmental Health Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually, or by request, with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino to bring the CalEnviroScreen percentile score below the 70th percentile impaired drinking water. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel particulate matter exposure which is concentrated in the northern portion of South Pasadena north of Mission Street, and groundwater contamination which is isolated in the southeastern portion of the City south of Mission Street and east of Meridian Avenue to reduce the impact of these in areas with the highest scores to below the CalEnviroScreen 50th percentile.	Determine whether there are existing sources of water contamination and mitigate as appropriate in identified areas to bring the CalEnviroScreen percentile impaired drinking water score below the 70th percentile; and groundwater and diesel particulate matter scores in identified areas below the 50th percentile.	General Fund	Public Works	Meet with water providers by June 2023 to develop strategies and review siting and mitigation requirements by December 2024.
Goal 2.0 Encourage and Assist in the Provision of Affordable Housing Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.				
Program 2.a – Provide Technical Assistance for Projects with Affordable Housing The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides	Expand housing mobility opportunities by encouraging construction of affordable units in higher-income residential areas, as well as on sites with developer interest including higher density residential, mixed-use sites within the Downtown Specific Plan and other mixed-use areas, and non-residential sites with redevelopment potential on underutilized commercial properties. Accomplish this by facilitating expedited review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the	General Fund	Community Development Department	Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency. The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.	potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.			
Program 2.b - Affordable Housing Production The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.	Fund and build 400 affordable units, at least 200 on sites with the highest access to resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and 200 affordable units on residentially zoned sites in higher-income neighborhoods to facilitate housing mobility in mixed-income neighborhoods, and limit potential for concentrating affordable housing in areas identified with higher rates of renter households and incidence of poverty.	Inclusionary in-lieu fees; General Fund; grant funding	City Manager's Office; Community Development Department	Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.
Program 2.c - CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the City's contracted housing rights and tenant protection agency.	Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The	CalHome	State of California/City Manager's Office; City's contracted housing rights and tenant protection agency	Ongoing as NOFAs are released for CalHome; City's contracted housing rights and tenant protection agency will conduct outreach at least once a year.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
	City's objective is to provide information to households in the areas with higher rates of homeowner overpayment and poverty and neighborhoods with a high proportion of renter households to facilitate housing mobility for a minimum of 50 low-income and 50 very low-income households to receive assistance during the 2021-2029 planning period. The status of availability of funding will be posted on the City's website and updated as funding becomes available.			
Program 2.d **- Section 8 Housing Choice Voucher Program for Rental Assistance** The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.	Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract with a housing rights and tenant protection agency to provide a biannual educational workshop, beginning in 2023, for rental property landlords, property managers, and other rental housing providers on the benefits of making their units available to HCV holders. Prioritize outreach efforts to property owners and landlords with multifamily and single family rental units in higher-income residential neighborhoods to reduce existing concentrations of HCV renter households in the Fremont Avenue/Huntington Avenue/Meridian Avenue and Mission Street neighborhoods and maximize housing mobility opportunities in higher income	HUD	Los Angeles County Development Authority, Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
	neighborhoods, with the objective of at least 40 housing providers committing to pricing one or more of their units to be eligible to accept HCV holders			
Program 2.e - Facilitate Density Bonus for Projects with On-site Affordable Housing The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.	Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.	General Fund	Community Development Department	Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance (Program 2.m): Ongoing
Program 2.f - Offer Services to People without Housing The City will continue its participation in the regional mobile outreach program administered by San Gabriel Valley Council of Governments (SGVCOG). As part of this program, an outreach team spends three hours per week in South Pasadena to provide referrals and support to unhoused individuals. In addition, the South Pasadena Police Department will continue to perform its own outreach to unhoused individuals in South Pasadena, referring them to 211 for resources and services and providing its remaining emergency motel vouchers that were purchased with the City's formerly allocated Measure H funds. SGV CARE The City of South Pasadena is participating in San Gabriel Valley Crisis Assistance Response and Engagement Program (SGV CARE) with Arcadia and San Marino. Launched in August 2022 by the SGVCOG and Los Angeles Centers for Alcohol and Drug Abuse (L.A. CADA), SGV CARE is the first multi-city regional effort to provide alternative mobile responses to 9-1-1 calls for people experiencing mental or behavioral health emergencies, including those who are unhoused. The SGV CARE response team is composed of a Licensed Clinical Social Worker, an Emergency Medical Technician, and a Substance Use Disorder Counselor, and it commits to a 30-minute maximum response time to non-violent, non-medical emergency service calls with a focus on serving a variety of needs related to mental and behavioral health and/or homelessness. The	Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.	General Fund and grants	Police Department, Community Development Department	Coordinate a meeting with neighboring jurisdictions by December 2023 to identify strategies and translate materials on homeless services to Spanish by March 2024. SGV CARE pilot program was launched in July 2022 with limited hours in the three cohort cities, and a co-response with law enforcement. Permanent SGV CARE program to begin June 2023.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
pilot phase of this program, also known as the Homeless, Mental Health and Crisis Response Pilot Program, entails a co-response with law enforcement and expires May 31, 2023. SGV CARE's approach alleviates the burden on law enforcement, while ensuring that communities members experiencing a mental or behavioral health crisis and/or homelessness receive safe and effective crisis intervention and de-escalation services; emotional support and counseling; mental health assessments; safety planning with referrals to local resources; and, if needed, transportation to a treatment facility or service provider. In SGV CARE's first quarter of operation, the average response was 10 minutes, and 64% of those served were unhoused individuals. Recognizing that crises do not end after a response call, a critical component of SGV CARE is following up with each client and connecting them to more appropriate on-going services, including those provided by the Los Angeles Homeless Services Authority (LAHSA), Union Station Homeless Services (USHS), the Los Angeles County Department of Health Services (DHS), the Los Angeles County Department of Mental Health (DMH), and other local organizations and entities that are critical participants in the homeless services system. L.A. CADA is already an active participant in the County's coordinated entry system (CES), and the County's mental health and substance use disorder (SUD) systems, so it is well-positioned to maximize these linkages. The City has already hosted several convenings of homeless services providers and other stakeholders to help build engagement and connections between the mobile response program. It is expected that this coordination will continue as the program roll-out advances. With the technical assistance of the Harvard Kennedy School Government Performance Lab, staff from SGV CARE cohort cities, SGVCOG, and L.A. CADA have been collecting and evaluating data and participating in regular implementation meetings to develop key performance metrics and improve the continued operation of SGV CARE beyond May 2023. The pilot program is fully funded by the Los Angeles County Board of Supervisors' Measure H funds, and the permanent SGV CARE program has thus far secured $850,000 in funding from State Senator Portatino's office and $1.5 million in federal funding. SGV CARE is an integral part of the City's adopted 2021-2026 Strategic Plan and commitment to affordable housing and helping				

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
persons of all income levels with housing options. The 2021-2026 Strategic Plan approved by Council on May 18, 2022 includes six key goals, including Goal 5: Plan for Affordable Housing to Comply with State Mandates and Respond to Community Needs. Additionally, item 5e, Homeless Initiatives, identifies several tasks including the City to continue working with the SGVCOG on region-wide solutions; participate in mental health/crisis intervention program (mobile crisis response program); and expand working relationships with community partners such as Union Station Homeless Services to help the unhoused..				
Program 2.g – Expand Senior Housing Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.	Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.	General Fund, grants, developer public funding sources	Community Development Department	Ongoing

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 2.h - Incentivize Special-Needs Housing City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.	Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties..	Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, State No Place Like Home Funds (administered by LACDA), and other State and federal programs designated specifically for special-needs groups	Community Development Department, City Council	Prepare reasonable accommodation procedure handout and application form and post on website by December 2023; Train staff to process reasonable accommodations by December 2023; Seek funding opportunities beginning in 2023 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act wthin 120 days after the adoption of the Housing Element.
Program 2.i - Inclusionary Housing Regulations – Monitor for Effectiveness To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. Due to economic conditions, the Council has directed an amendment to revise the requirement (See Program 2m). The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. The City will encourage projects that meet this threshold to locate within higher-income neighborhoods and neighborhoods with lower proportions of rental households to facilitate income integration and housing mobility opportunities for lower-income and renter households, and reduce	Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.	General Fund (Code development); developer obligation (implementation)	Community Development Department	No later than June 30, 2025, review effectiveness of the Inclusionary Housing ordinance at producing affordable housing units and its impact on the viability of housing production. Make adjustments as necessary to the Inclusionary Housing ordinance based on the review findings no later than December 31, 2025.

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further concentration of affordable units in identified areas of lower-incomes, higher diversity index scores, and larger proportions of renter households. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375 encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards. On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units. Additionally, the City shall review the effectiveness of the Inclusionary Housing regulations and if revisions are deemed necessary, they will be made when such needs are identified. The review will include consultation with the local development community and shall utilize constraints on development as a criteria, including housing costs and timing, and will ensure revisions do not act as a constraint on development.				
~~***Program 2.j – General Plan Affordable Housing Overlay*** ~~The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites outside of the Downtown and Mixed-Use districts, particularly in higher-income areas with lower proportions of renter households and sites with access to transit, commercial, services, higher performing educational facilities and amenities. The overlay will be applied including the specific state law requirements for the rezoning of the sites.~~	~~Develop at least 400 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing, mobility and income integration opportunities to high resourced areas.~~	~~General Fund, (for staff resources)~~	~~Community Development Department~~	~~Adopt overlay at the time of General Plan adoption, that will occur with 120 days of adoption of the Housing Element.~~
~~***Program 2.k – Affordable Housing Overlay Zone*** ~~The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed-Use districts. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.~~	~~Develop at least 30 units/acre of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility opportunities to high resourced areas.~~	~~General Fund~~	~~Community Development Department~~	~~Amend zoning to include overlay by October 15, 2024.~~

Program 2.1 – Facilitate Affordable Housing on City-Owned Property The City will utilize identified City-owned sites to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low, and lower income households. . The City will sell such parcels to developers building affordable housing or otherwise ensure the development of housing on such sites. This process will begin with a review of assets to create an inventory of City-owned site for affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will then include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, tthe City will initiate the Surplus Lands Act (SLA) process to pursue affordable housing projects in the city. The City will require an affordability covenant recorded against the land stipulating a specified percent of the total units developed will be affordable to lower-income households, in accordance with State law. The City will comply with State law to implement the SLA process as follows: ▪ The City will declare land "surplus" in accordance with the definition listed in Government Code, Section 54221, subdivision (b)(1). ▪ The City will prepare and issue a Notice of Availability (NOA) to the required parties and provide 60 days to receive responses from interested parties. ▪ The City will negotiate in good faith with any respondents for at least 90 days, prioritizing affordable housing uses in the order provided in Government Code section 54227. ▪ The City will send the proposed disposition to the State for review. ▪ The City will address any State findings, as needed. ▪ Upon final State approval, the City will execute a sale or lease of the land and record an affordability covenant. The first RFP will be issued by March 31, 2024, in order to begin construction within two years and complete within the housing element cycle period. Three other RFPs on three additional inventory sites will be issued by 2026, with the goal of the City disposing of all indentified and applicable surplus sites. Projects under this program will be expedited in compliance with the SB 35 streamlined ministerial	Sale of all City-owned surplus properites for housing. Issuance of RFPs on four projects and issuance of building permits for at least two projects, for a total of at least 40 ELI, VLI and LI units, 18 moderate income units, and 11 above moderate income units.	General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications.	Community Development Department (Housing Division)	Create a city-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP by 2024 and remaining three RFPs in 2026. Building Permit issuance for first project by 2025; two additional building permits issued by 2029. Bi-annually, review progress towards developing city-owned sites and identify alternative sites within 6 months if sites will not be developed within the planning period.

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process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives, as applicable. The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are listed below in addition to the sites discussed in the next paragraph: ▪ Site 8: Public works yard site ▪ Site 13: City-Owned Parking Lot site (City owns three of the four parcels) There are no existing uses on these sites that impede additional development and there are no known conditions that preclude development in the planning period. The City is already coordinating with the owner of the other parcel on Site 13. Site 8 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site 12 in Table VI-50 and will coordinate with the owner of the other parcel on Site 12 to encourage development of housing on that sites. Additionally, the City will commit to monitoring the continued progress of developing the city-owned sites every other year and will identify alternative sites within 6 months if necessary if sites will not be developed during the planning period.				
Program 2.m – Update Inclusionary Housing Regulations. In order to broaden the feasibility for projects to include on-site inclusionary housing, the City will revise the Zoning Ordinance to reduce the required percentage of inclusionary units from 20% of base units to 15% of base units. Additionally, an exemption to the Ordinance will be added for projects with less than 10 units. Other provisions of the ordinance will also be reviewed, in consultation with the local development community, in the revision process inlcuding but not limited to in-lieu fees, cost of a comparable unit and how the inclusionary regulations relate to state density bonus law and other City development standards. As part of Program 2.i., the effectiveness of the Inclusionary Housing Ordinance will be reviewed in 2025 and additional changes will be made to the Ordinance if it is deteremined that it is an impediment to housing development.	Approve 137 inclusionary units during the planning period (15% inclusionary requirement on the moderate- and above moderate RHNA allocation of 912 units).	General Fund	Community Development Department and City Council	Adopt updates to the Inclusionary Housing Ordinance within 120 days of Housing Element adoption
Program 2.n – Citywide Height Limit Ballot Initiative Consistent with requirements under state law concerning cities placing measures on the ballot, the City will seek through voter approval in a local election, the repeal of the current height limit of 45 feet as to at	Facilitate proposed densities on residential sites in the Housing Element where the height limit	General Fund	Community Development Department and City Council	Place measure on ballot by December 31, 2024. Within 120 days after the enactment of a ballot

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least any residential or mixed-use (including residential) project on which the housing element anticipates a base density in excess of 50 units/acre. Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely, or be replaced by a new height limit localized in the areas of increased density to stated density goals..~~If the height limit is replaced, the new limit will be no less than 84 feetto achieve the densities identified in the DTSP..~~ In addition, the City will facilitate residential projects that may exceed 45 feet by utilizing the existing options for exceptions to the citywide height limit, including state Density Bonus law. (See also Program 3.n.) If the ballot measure is approved, the City will update development standards throughout the DTSP and zoning code to allow for buildings that can achieve the densities identified in the Housing Element. ~~If the ballot measure is not approved by the voters, the City will complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre; the City will conduct additional rezoning to address the remaining RHNA on sites allowing densities greater than 50 dwelling units per acre. This will include preparing a mid-cycle Housing Element.~~ **2025 Update: The Council opted to place a measure on the ballot (Measure SP) that repealed height limits, allowing Council to establish height limits as appropriate to accommodate the densities in the housing element. Measure SP was approved by the voters on November 5, 2024. Measure SP did not propose a specific height limit, and instead allows the City Council to establish heights in zones other than single family zones.**	may be an impediment to development.			measure repealing or replacing the height limit, the City will **hold the first hearing in the process to** revise the development standards contained in the DTSP and zoning code. If the ballot measure is not approved by the voters, within 9 months thereafter complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre
Goal 3.0 Provide opportunities to increase housing production Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.				
Program 3.a - Rezone and Redesignate Sites to Meet RHNA ~~**Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably zoned sites to address the lower income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended.**~~ As part of ~~this~~ the rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Density Residential zone to at least 30 dwelling units per acre (du/ac) and to at least 45 du/ac within the High Density Residential zone. Per	Rezone sufficient sites to accomodate the City's RNHA targets.	General Fund	Community Development Department	General Plan amendments and rezoning: will occur within 120 days of adoption of a compliant housing element.

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California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 15-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Additional zoning capacity will be achieved through the adoption of the Downtown Specific Plan (DTSP) and the increase in permitted density along the City's arterial corridors **and on large, underutilized sites** either through inclusing within the DTSP or through a zoning overlay district. Allowable densities within these areas will be **50-**70 du/ac, except for the Fair Oaks zone within the DTSP, which will be ~~110~~ **90** du/ac. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. ~~Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.~~				

Program 3.b - Mixed-Use Developments and Adaptive Re-Use
 	
As part of the rezoning and adoption of the DTSP through Program 3.a, the City will create development standards that encourage the development of high density residential uses. It is anticipated that the base density of the DTSP zones will be ~~either 70 or 110~~ **between 50 and 90** du/ac, depending on the zone.
 	
Both the Mission Street and Fair Oaks zones in the DTSP will contain the following objective development standards:
 	
• Setbacks: 0 feet along the building frontage and sides, and no more than 15 feet in the rear of the building.
• Floor Area Ratio: FAR will facilitate maximum allowable densities in each DTSP zone.
• Minimum unit size: 450 square feet.
• Required parking:
  ○ No required parking for parcels within ½ mile of a high quality transit stop;
  ○ One space per studio or one-bedroom unit;
  ○ 1.5 spaces per two-bedroom or larger unit;
  ○ Development incentive of 0.5 spaces for deed restricted affordable housing units.
• Private open space: 50 square feet minimum for Liner and Flex Building typologies.
	Increased production of housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.	General Fund	Community Development Department	Adopt General Plan, Downtown Specific Plan, and other needed zoning changes with objective development and design standards within 120 days of adoption of a compliant Housing Element. See also Program 3.a. Modify City website to include revised process for streamlined processing of planned development permits for mixed-use and Downtown Specific Plan applications and post notification and educational materials for objective development and design standards by November 2023. Update handout materials by November 2023; Ongoing at the Planning Counter and as applications are received.

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These development standards will be updated upon repeal or replacement of the existing height limit in accordance with Program 2.n to allow for the construction of buildings that can achieve the densities identified in the Housing Element. Additionally, development incentives that would encourage the construction of affordable units within market-rate projects, beyond those required by State Density Bonus law, will be included in the DTSP. These development incentives may include: • Reduced private open space requirements; • Reduced public open space requirements; • Reduced parking requirements; • Expedited processing. The City will analyze and consider a fee reduction or waiver at the mid-point review in the event that other efforts to facilitate affordable housing production are inadequate. ▪				Outreach to affordable housing developers annually (see Program 2.a.) Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code accordingly. Fee study if needed by December 2025.
Program 3.c – Replacement of Lost Units from Residential Demolitions In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. Currently, existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. This requirement applies to: ▪ Non-vacant sites ▪ Vacant sites with previous residential uses that have been vacated or demolished.	Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.	General Fund	Community Development Department	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Program 3.d – Enable Parcel Assemblage To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot	Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.	General Fund (legislative efforts); Grant funding (implementation)	City Manager's Office; Community Development Department	Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate

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consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. The City will support developers/owners who approach the City with interest in lot consolidation for the development of affordable housing by deferring certain fees, allowing more height or additional stories, waiving lot merger fees to enable the project, and providing concurrent/fast tracking of project application reviews. By 2023, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.				within six months and review annually thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.
Program 3.e – Develop an Electronic Permitting System Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.	All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.	General Fund and grants	Community Development Department	Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.
Program 3.f – Allow and Facilitate ADUs The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The City will continue to work with HCD on their review of the City's ADU ordinance. If revisions are found to be necessary, the City will make revisions to bring its ADU ordinance into compliance with State law. The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time.	Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADU's, anticipated to be between 297 and 420 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).	General Fund; SCAG grant	Community Development Department	Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. The City will revise their ADU ordinance within six months of receipt of the HCD response letter to their ADU ordinance, if updates are needed based on the HCD letter, and update ADU brochures in 2023, and and update ADU Amnesty information and incentives based on any state law changes. Review the effectiveness of the ADU regulations every two years starting

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As part of this program, the City will perform the following community outreach and education activities to facilitate ADU development by South Pasadena's property owners: • Allocate staff time to distribution of educational materials in single family residential neighborhoods at public events such as street fairs and farmers' markets; • Make brochures available at community center and libraries, and at "ADU Community Open House"; • Create short promotional videos or flyers and brochures (digital and print) by January 2024; • Distribute at least annually though social media promotions, direct mailings to property owners, with a particular emphasis on predominantly single-family neighborhoods and high resources areas; water bill inserts; and the dedicated City webpage (Program 3.k). This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include: ▪ Online application process with staff intake for quality control ▪ Maintain and amend materials for better applicant guidance, as needed ▪ Provide consistent staff training and support ▪ Look for all opportunities to provide certainty earlier in the process ▪ Reduce the number of steps and shorten timeframes, and Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.				in December2023, and if needed based on staff review and/or in response to changes to state ADU law, update the ordinance within 6 months of the review.

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Program 3.g – Monitor ADU Production The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting in January 2024 and every two years thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient to match the projected trendline of 95 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).	Approve an additional 297 ADUs between January 1, 2022 and October 15, 2029.	General Fund	Community Development Department	Assess ADU approval progress in January 2024, again in January 2026, and again in January 2028 and adjust after each of those milestones if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and actual building permits then barriers will be identified and rezoning will be completed as called for in Program 3.h.
Program 3.h – Back-up to Address Shortfall in Anticipated ADUs The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production starting in January 2024. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026.	Monitor to achieve as many lower-income ADUs as possible and adjust programs for more effective strategies as needed. If ADU development doesn't occur at the rate projected, the City will identify sufficient land for rezoning, or other strategies, to accommodate the unmet lower-income RHNA that was projected to be met by ADUs.	General Fund	Community Development Department	The City will annually monitor the ADU progress and assess barriers including any need for rezoning by the end of 2023 and present to Council for approval by the end of 2024. Determine whether other additional programs including rezoning are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026.

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Program 3.i – ADU Amnesty Program To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under certain circumstances specified by SB 13 and other provisions, enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.	Provide assistance to homeowners with a goal to convert 50 identified existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.	General Fund (for staff resources)	Community Development Department	Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach. Identify neighborhoods with relatively high proportions of unpermitted ADUs by July 2024 to target outreach. Determine incentives for legalizing ADUs with deed-restricting commitment by January 2024. Update brochures with legalization process information and incentives in concert with ADU Ordinance update timeframe
Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.	Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.	General Fund	Community Development Department	Develop affordability covenant program by July 1, 2023.
Program 3.k – ADU Education, Promotion and Homeowner Outreach A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers	Facilitate the process for the development of 297 ADUs through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.	General Fund, grant funding	Community Development Department	Created historic property guidelines and brochure. Built up the Virtual Planning Desk with complete ADU information, including examples of ADUs on webpage. Develop list of

[1] Chapple, Garcia, et al. *Reaching California's ADU Potential: Progress to Date and the Need for ADU Finance*, 18.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc. The City will also make the following efforts to promote ADU development: ▪ Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and inform ADU owners and renters of such information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development. ▪ Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly. ▪ Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs. ▪ Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage. ▪ Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.				resources, and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 3.l – Increase and Maintain Planning and Housing Staff Resources The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.	Augment and support staff resources to expedite housing projects and implement housing programs.	General Fund	Community Development Department, City Council	The Housing Division was included in the 2022-2023 budget and new staff was hired by November 2022. Planning unit is operating with 5 FTE and recruiting for one additional person.
Program 3.m – Implement SB 9 and SB 10 The City intends to promote the housing mobility opportunities and increase the supply of affordable units in neighborhoods with higher incomes and resources. This will include the development of streamlined processes for SB9 and an SB10 implementation program with pre-approved building typologies. Specifically, the City will create a "Missing Middle" housing program. This program will establish objective design standards for certain housing types in low density residential zones within high-quality transit areas as defined by the Southern California Association of Governments (SCAG), except where the boundary may overlap with designated high fire hazard areas. Missing Middle housing types contemplated for this program will include duplexes, triplexes, four-plexes, and cottage courts. The baseline density for this program will be 15 du/acre in the RE and RS zones. Staff shall present a specific proposal to the City Council for consideration and adoption, including a finding that the ordinance is consistent with the City's obligation to affirmatively further fair housing. The missing middle housing program proposal will include: o Zoning Code Text Amendment to establish a Missing Middle housing program. o Appropriate development standards to facilitate program density including but not limited to: identifying lot size requirements, reducing setbacks, increasing FAR and evaluating minimum unit size requirements. o A simple waiver system to ensure development standards do not preclude the density of 15 du/acre. o An exhibit or definition to clearly demarcate the area that is subject to the ordinance.	Facilitate the development of at least 50 units with the SB10 Missing Middle housing program over the reporting period..	General Fund; SCAG REAP 2.0 Grant	Community Development Department	The City will work with a technical consultant to develop objective design standards or building typologies related to this program and prepare and present the necessary implementation policy and zoning amendments to effectuate the program within 24 months of the adoption of the Housing Element. By December 2027, analyze Missing Middle housing program and make modifications as necessary. "Missing Middle" housing will be prepared within 120 days after the adoption of this Housing Element.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
By December 2027, the City will analyze whether it is on track to meet the eight-year objective for the Missing Middle housing program. If, at that point, the City is not on track to meet the eight-year objective, it will increase the allowable maximum density for this program.				
Program 3.n – Zoning Changes This program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP). In addition, comparable Zoning Code revisions outside of the DTSP area will further implement this program. The types of standards and processes that will be revised to reduce the constraints on development including, but not limited to, height limits, open space standards, and parking requirements. Additionally, subjective approval findings will be removed in compliance with State law to facilitate administrative approval of residential developments.	Update zoning to facilitate the needed housing units.	General Fund	Community Development Department	General Plan amendments and rezoning will occur within 120 days after adoption of a compliant Housing Element.
Program 3.o – No Net Loss The City will evaluate the sites inventory identifying the zoning, size, and number of vacant and underutilized parcels suitable for residential development for each income category. If the sites inventory indicates a shortage of available sites to accommodate the remaining RHNA for an income category, the City shall rezone sufficient sites with appropriate densities to accommodate its remaining RHNA for each income category.	n/a	General Fund	Community Development Department	No later than December 31, 2024 and December 31, 2026, the City shall evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites.
Goal 4.0 Compliance with State Housing Laws Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.				
Program 4.a – Land Use Controls – Emergency Shelters In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))	The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law in regard to parking and distance between shelters and to establish a higher, economically feasible maximum number of beds permitted in any one emergency shelter and	General Fund	Community Development Department	Adopt zoning amendments within one year of Housing Element adoption.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
	accommodate the increased homeless population documented in the 2022 Point in Time count.			
Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing. Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.	The City will adopt an amendment to the Zoning Code for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.	General Fund	Community Development Department	Complete amendments to Zoning Code within 120 days after adoption of the Housing Element.
Program 4.c – Land Use Controls – Flexible Zoning Regulations The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.	The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.	General Fund	Community Development Department	Ongoing as applications are received.
Program 4.d – ADA Accessibility Standards Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.	Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an	General Fund	Community Development Department	Amend zoning by 2024.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
	adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals for a minimum of 207 accessible units over the 2021 – 2029 planning period.			
Program 4.e –Universal Design Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member in areas with access to transit, commercial services, and amenities to improve mobility opportunities.	Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 15 percent of new homes incorporating universal design. Within the Downtown Specific Plan and mixed-use zones, target development of 300 new homes incorporating universal design.	General fund, grants	Community Development Department	Three years for development of zoning standards and incentives with completion by July 2025; ongoing application and enforcement of accessibility requirements; ongoing education efforts and information added to ADA requirements on City website.
Program 4.f – Senate Bill 35 Procedure or Policy Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.	Streamline housing projects as required by SB 35.	General Fund	Community Development Department	Complete by June 2024.
Goal 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.				
Program 5.a – Fair Housing Education, Outreach, and Services Provide fair housing education, outreach, mediation, and referral services through the Housing Division and a contracted fair housing and landlord-tenant legal organization and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. Distribute informational materials to community organizations and	Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022 by providing assistance or referrals to 40 residents, or as needed; respond to or forward all fair housing complaints within five business days of receipt; and	General fund, State, and federal funds	Community Development Department, federal and State agencies	Ongoing; Meet annually with the City's contracted fair housing and landlord-tenant legal organization, beginning in 2023, to assess patterns of fair housing issues, and plan and target outreach,

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
neighborhood gathering spots in areas with higher rates of protected groups, particularly in the South Pasadena Southwest neighborhoods with higher rates of disabled persons; the South Pasadena North/Garfield Park areas with a higher proportion of seniors with disabilities and renter populations; and the South Pasadena Southeast neighborhoods with higher rates of poverty, renter households and lower incomes. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.	work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with the City's contracted housing rights and tenant protection agency staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.			education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.
Program 5.b – Encourage a Variety of Housing Types Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements, when a state license is a requirement for the residential care facility.	Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.	General fund, State, and federal funds	Community Development Department	First zoning text amendment within 120 days after adoption of a compliant housing element. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.
Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide In the 1940's, covenants that restricted the sale of property to white people only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In	Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media	General Fund; grants if offered through a State or County program	Community Development Department; Los Angeles County Recorder	Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December 2023; encouragement of removal from private properties: ongoing.

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.	campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.			
Goal 6.0 Expand and strengthen tenant protections for South Pasadena's existing renters South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.				
Program 6.a – Rent Registry Staff will research, develop, and propose to City Council a local rent registry program. The program would require owners of certain rental property types (those with a minimum number of units, for instance) to register their units and pay a per-unit registration fee on an annual basis. Staff envision the rent registry serving initially as a database that the City would use to collect and track rental data on units, including affordable units, and to disseminate information to property owners about tenant protections. However, the utility of the rent registry could be expanded over time to incorporate additional monitoring, compliance, and enforcement activities as new programs are established and linked to it. Staff will draw from thorough analysis to develop the details of the program, which will be subject to the approval of City Council.	City will have a comprehensive online database of all affordable and market-rate rental housing units in South Pasadena subject to the registration requirement with a user interface and fee payment system for rental property owners. The registry will be updated annually and serve as a streamlined platform for Community Development staff to track the City's rental housing inventory and provide information to rental housing property owners. City will decide whether to link this registry to the administration of other activities and programs.	General fund (staff time for development and administration); registration fees from property owners	Community Development Department (Housing Division)	Propose policy to City Council by February 2024

PROGRAM	EIGHT-YEAR OBJECTIVE	FUNDING SOURCE	RESPONSIBLE AGENCY	TIMEFRAME
Program 6.b – Right to Return Policy Staff will research, develop, and propose to City Council a policy that establishes a tenant's legal right to return to a property after eviction and/or relocation due to substantial remodel or other other just cause reasons. This program, along with Programs 6.c and 6.c, if approved, could be included in a single Tenant Protections Ordinance.	In qualifying circumstances, all tenants who are temporarily displaced from their units due to construction work and wish to return upon completion will be able to do so under the law. Thus, this policy will stem permanent the permanent displacement of renters from South Pasadena due to just cause no-fault evictions and/or relocation for certain reasons.	General fund (staff time to develop the program)	Community Development Department (Housing Division)	Propose policy to City Council by December 2023
Program 6.c – Relocation Assistance In 2019 and 2021, in response to the COVID-19 pandemic, City Council passed two urgency just cause ordinances that require the landlord to pay relocation assistance to the tenant when evicting the tenant for a just cause no-fault reason. Staff will review these urgency ordinances and draft and propose to City Council a new permanent ordinance with permanent and/or temporary relocation assistance requirements.	South Pasadena renters will have local tenant protections that reduce the financial burden placed on tenants when they are (temporarily or permanently) displaced from their homes for legally permitted reason and instead place financial obligations onto the property owners.	General fund (staff time to develop the program); property owners	Community Development Department (Housing Division)	Propose policy to City Council by December 2023
Program 6.d – Rent Stabilization Staff will research, develop, and propose to City Council a local rent stabilization program that would establish a low cap on rent increases that that set by the Tenant Protection Act or AB 1482.	Reduce high rent burdens and forced moves amoung South Pasadena's tenants due to excess rent increases and, in turn, increase their financial security and housing stability.	General fund (staff time to develop the program)	Community Development Department (Housing Division)	Propose policy to City Council by December 2023

6.2 INTRODUCTION

6.2.1 Overview

The Housing Element is one of the eight General Plan Elements mandated by the State of California. In addition to the Housing Element, the City of South Pasadena General Plan contains a Land Use & Community Design Element, a Circulation & Accessibility Element, an Economic Development & Revitalization Element, a Historic Preservation Element, an Open Space & Resource Conservation Element, and a Safety & Noise Element. The City of South Pasadena (City) is currently updating all General Plan elements to be adopted in close coordination with the Housing Element. Each General Plan Element is designed to be consistent with the remaining elements.

The California Government Code considers the availability of housing and the attainment of a suitable living environment for every California family a priority of the highest order. The Housing Element is the only General Plan Element subject to review and "certification" by the State of California for compliance with all statutory requirements. State law is more specific about the content of local Housing Elements than the remaining General Plan Elements. The State agency responsible for review and certification of Housing Elements is the California Department of Housing and Community Development (HCD). The Housing Element is required to identify and analyze existing and projected housing needs and contain goals, policies, quantified objectives, and planned programs for the preservation, improvement, and development of housing.

The City of South Pasadena General Plan Housing Element provides a framework for meeting the housing goals of the City and serves as an informational document for current and prospective residents of the community, businesses, and developers. General Plan Housing Elements became mandatory in 1969. The City of South Pasadena adopted its first Housing Element in 1984 and subsequently adopted General Plan Housing Element Updates on March 7, 2001, for the planning period covering March 2001 through March 2006, on January 18, 2012, for the planning period of June 2006 to June 2014, and on January 15, 2014, for the planning period of October 2014 to October 2021. This General Plan Housing Element Update covers the planning period from October 2021 to October 2029.

6.2.2 Purpose and Authority of the Housing Element

The General Plan Housing Element is required to include an assessment of housing needs of all economic segments of the community and an implementation program formulated to meet those needs. Local governments should consider economic, environmental, and fiscal factors as well as the community goals set forth in the General Plan in preparing a Housing Element and should cooperate with other local governments and the State in addressing regional housing needs. Housing Elements are required to address the local government's "fair share of regional housing need" as reflected in the Regional Housing Needs Assessment (RHNA) as determined by the local Council of Governments (COG). The COG for the Southern California region, including South Pasadena, is the Southern California Association of Governments (SCAG). A local government's identified RHNA includes both the existing and projected housing needs of the locality. To address South Pasadena's respective fair share of regional housing need, this Housing Element must include an assessment of available suitable housing sites based not only upon the existing zoning and land use

restrictions of the locality, but also on the potential for increased residential development under alternative zoning and land use restrictions and based on new housing policies aimed at addressing a historic lack of inclusivity.

The following minimum components are required for the General Plan Housing Element and form the basis for the structure of this document.

Housing Needs Assessment (Section 6.3)

The housing needs assessment addresses the existing needs of a jurisdiction and includes an analysis of the number of households overpaying for housing, households living in overcrowded conditions, or households with special housing needs, such as seniors, those with developmental disabilities, large households, and homeless. The number of housing units that need rehabilitation and the number of assisted affordable units at risk of converting to market rate must also be identified. The housing needs assessment also must analyze a jurisdiction's projected housing need, as established by the COG, identifying the number of new units needed by income category to accommodate expected population growth over the eight-year planning period of the Housing Element. This provides a benchmark for evaluating the adequacy of local zoning and regulatory actions to ensure that the City is providing sufficient, appropriately designated land and opportunities for housing development to address population growth and job generation.

Fair Housing Assessment (6.4)

A Housing Element must include an assessment of fair housing impacts on different geographic areas and different groups who live in the City. This section focuses on analysis of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. It also includes information about fair housing services available, local history related to fair housing and how the sites inventory interfaces with the fair housing issues.

Analysis of Constraints on Housing (6.5)

A Housing Element must include an assessment of both the governmental and non-governmental constraints to development of housing, such as land-use controls, fees and other exactions, on-site and off-site improvement requirements, building codes and their enforcement, permit and processing procedures, and potential constraints on the development or improvement of housing for persons with disabilities.

Site Inventory and Analysis (Section 6.6)

A Housing Element must include a detailed land inventory and analysis of properties suitable for residential development, a general analysis of environmental constraints, the availability of infrastructure, and an evaluation of the suitability, availability, and realistic development capacity of sites to accommodate the jurisdiction's RHNA by income level. To meet this statutory requirement, local governments must either provide a detailed analysis demonstrating how adopted residential densities accommodate the regional housing need for lower-income households, or as an option and alternative to preparing the analysis described previously, Government Code Section 65583.2(c)(3)(B)

allows local governments to elect the option of using "default" density standards that are "deemed appropriate to accommodate housing for lower-income households." The default density option is not a mandated density. The default density standard provides a streamlined option for local governments to meet the density requirement. No analysis to establish the appropriateness of the default density is required and HCD must accept that density as appropriate in its review. The minimum default residential density established for South Pasadena by HCD to accommodate the RHNA for lower-income residential development is 30.0 dwelling units per acre (du/ac.).

If the Housing Element does not demonstrate adequate sites, appropriately zoned at the HCD-established default density to meet the jurisdiction's RHNA by income level, the Housing Element must include a program to address the needed units. This could include programs to provide suitable zoning on additional sites that allows owner-occupied and rental multifamily uses.

Performance Review of the Previous (2014-2021) Housing Element (Section 6.7)

The Housing Element must include a section that reviews the goals and policies contained in the 2014-2021 General Plan Housing Element and assesses achievement of those goals along with a review of the achievement of the Housing Element's quantified objectives.

Housing Programs (Housing Plan) (Section 6.8)

A Housing Element must identify programs designed to assist in the development of housing for low- and moderate-income households, remove or mitigate governmental constraints, conserve and improve the existing affordable housing stock, promote equal housing opportunity, and preserve any units identified as at risk of conversion from affordable housing.

Quantified Objectives

A Housing Element must include estimates of the number of units, by income level, to be constructed, rehabilitated, and conserved over the planning period of the Housing Element.

6.2.3 Authority and Scope of the Housing Element

Adopted policies and guidelines affecting the preparation and content of the Housing Element, in addition to California's Housing Element guidelines, include the City's General Plan Land Use Element adopted in 1998, which has been undergoing an update process that affects and is affected by this Housing Element update. The General Plan Land Use Element identifies general housing goals, policies, and programs to implement the community's vision for the ultimate build-out of the City and establishes acceptable residential densities for development in the City. The Land Use Element also contains plans for each neighborhood of the City, identifying existing and projected housing units and population. The current comprehensive update of the General Plan, including the Land Use Element, is being conducted concurrently with this Housing Element to ensure consistency and facilitate the implementation of Housing Element policies.

6.2.4 Public Participation

South Pasadena is a community of active residents and business owners, and public participation is always encouraged and valued in the planning process. Public participation is particularly important for this housing element cycle, which coincides with one of the City's most important long-range planning efforts in recent years, the updates of the General Plan and the Downtown Specific Plan (formerly Mission Street Specific Plan). South Pasadena's particularly high RHNA allocation has created the need to integrate the land use decisions in these plans with the Housing Element. Therefore, public participation for these efforts is part and parcel of the outreach for the housing element.

To introduce the community to the requirements and process that would need to be undertaken to produce the Housing Element, and to receive feedback and answer questions about community housing needs and actions the City could take to address them, the City conducted a series of community meetings and public hearings starting in May 2020. Although initially scoped as in-person meetings, due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in March 2020 in response to the COVID-19 pandemic, public workshops were held online to provide a way for residents to engage with the Housing Element update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation. The invitations for these public workshops were electronically shared with the Eventbrite platform. The invitation contained a URL link that connected workshop attendees to the virtual meeting space on the Zoom platform. About 80 people participated in an on-line workshop. The City also conducted two online community surveys that were launched prior to the public workshops and held multiple study sessions with the Planning Commission.

Appendix B contains detailed notes from the public workshops, surveys, study sessions and hearings. A summary of all written comments and how the comments on the public draft were addressed in this draft is also included in Appendix B.

At the beginning of the planning process, the City established a dedicated Housing Element webpage, (https://www.southpasadenaca.gov/government/departments/planning-and-building/housing-element-update-2021-2029) which was updated regularly, with information on outreach events, recordings from past workshops and meetings, RHNA information, background on the Housing Element Update, and a contact email for communication with the Planning Division (housingelement@southpasadenaca.gov). Drafts released to the public are posted on this site as well. The webpage includes a link to request project updates, and Planning has regularly sent emails about hearings and project milestones to this list. Although translation is offered at City meetings if requested, no requests have been received for meetings for the Housing Element Update. Translation to Chinese, Spanish and Korean has been offered as part of past City projects.

The Public Review Draft Housing Element was released for public review including posting on the City of South Pasadena's website on October 12, 2021. The City submitted the draft to HCD for their first review On October 22, 2021. In addition to holding a workshop and three Planning Commission and City Council meetings to received comments on the draft (details are provided in Appendix B), multiple news items published in the South Pasadenan and South Pasadena Review in

Fall 2021 highlighted the Housing Element process and the availability of the draft for public review and input.

During the months of January through March 2022, staff researched affordable housing developers and homeless service providers and added them to the list of interested stakeholders. Additionally, staff had meetings with the San Gabriel Valley Habitat for Humanity Executive Director and the Director of Real Estate Development to explore opportunities for potential future partnerships. Staff also met with the Los Angeles County Development Authority to explore use of Permanent Local Housing Allocation funds to benefit South Pasadena residents in need of affordable housing. Finally, staff held several meetings with local developers, including a church, to discuss affordable housing development.

During the months of April 2022 through August 2022, the following public meetings and hearings occurred where the status and content for the Housing Element was discussed to obtain additional feedback:

- April 27 Chamber Economic Development Meeting, planning staff presented on General Plan, Downtown Specific Plan and Housing Element
- June 14 Chamber Economic Development Meeting, Community Development Director attended with City Manager and Deputy City Manager to discuss Economic Development and City initiatives and answer questions on any topic including the Housing Element
- June 15, City Council presentation, update on 2nd draft of the Housing Element
- July 21, 2022, Community Development Director attended Mission District Business Stakeholders Quarterly Meeting to give update on draft Housing Element
- July 26, Planning Commission meeting on the draft Housing Element
- July 27 Special City Council Meeting on the draft Housing Element
- Aug. 10, Special joint meeting with City Council and Planning Commission on the draft Housing Element

Developer Forum, August 15, 2022 (Workshop 6)

In August 2022, the City conducted a Developer Forum. There were 8 community members, including two Planning Commissioners in attendance at the City's Developer Forum on August 15, 2022. The City provided a brief presentation that included a status update of the draft Housing Element and the draft General Plan and asked for input on several topics including input on development standards and processes and procedures, input on the City's Inclusionary Housing Ordinance and input on likelihood of development on lower-income housing sites identified in the land inventory. See Appendix B for the notes from the forum.

Community Outreach at SP Farmers' Market, August 18, 2022 (Workshop 7)

On Thursday, August 18, 2022, the Community Development Department set up a booth in the South Pasadena Farmers' Market from 4:00 to 8:00 pm to discuss the Housing Element. The late afternoon/evening market attracts hundreds of residents and many local employees and is a casual atmosphere for sharing ideas. Over the four-hour duration of the Market, Community Development staff discussed various aspects of the housing element with visitors to the booth, including: the sites

inventory; ADUs; the regional housing crisis; the need for rezoning and mixed-use development and where it would be located; and reconsideration of the voter-approved height maximum through a new ballot initiative within the next two years. Those who stopped by expressed appreciation for the opportunity to talk to City staff about the issues. See Appendix B for a full list of comments received.

Community Forum and Informational Workshop, August 20, 2022 (Workshop 8)

The City held a hybrid public workshop on Saturday, August 20, 2022, from 10:00 to 11:30 am. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the forum was to provide a brief overview of the Housing Element process; provide an update to the community on the status of addressing HCD's comments to the second draft of the Housing Element; and to solicit feedback from the community on the draft document and proposed programs. After a brief overview of the housing element process, the presentation focused on the bigger issues that needed to be addressed in the Housing Element, including the site analysis, development constraints including the height limitations, and Affirmatively Furthering Fair Housing.

After the presentation, the public was invited to ask questions and share comments. The meeting had approximately sixteen participants, including nine in-person and seven on Zoom. Thirteen participants spoke. Please see Appendix B for a full list of comments and questions received.

Outreach for the 2025 Amendment

The certified Housing Element presumed that some level of increased building height in excess of the City's current height limit would be needed to achieve the minimum densities allowed to ensure adequate capacity for housing. The key program to ensure this capacity was Program 2.n – Citywide Height Limit Ballot Initiative. In order to ensure community engagement with the purpose and significance of the initiative, the Council authorized a robust public outreach process for its development.

On Wednesday, June 12, 2024, City staff hosted a town hall discussing the City's Housing Element and a potential upcoming ballot measure regarding increasing height limits in the City. The South Pasadena City Council hosted a special study session on the proposed ballot measure related to the height limits on Wednesday, July 17, 2024. During this study session, the City Council discussed the need for new height districts in the Downtown, Ostrich Farm, and Huntington Drive areas to support the new housing units. The City hosted an Open House for the community on Thursday, July 25, 2024 about Measure SP. This Open House featured mini charrette-style dialogue, supported by large-scale maps and photo simulations, to look at areas where higher density development was anticipated.

On July 31, 2024 the South Pasadena City Council adopted a Resolution ordering the South Pasadena Neighborhood Preservation, Local Control Measure (Measure SP) to be placed on the November 2024 Ballot. In November 2024, Measure SP was passed by South Pasadena voters, allowing Council the flexibility to increase height limits beyond 45 feet in higher density districts.

Measure SP Implementation Outreach Efforts, January-March 2025

In order to provide multiple opportunities to communicate with and hear from the community following the approval of Measure SP, the Community Development Department, together with its consultants, the Arroyo Group, developed an extensive outreach plan over the months of January through March 2025.

On January 14 and 23, 2025, the City hosted two community listening sessions. These listening sessions included a small informational portion, educating attendees on the current status of the Measure SP implementation and other relevant updates from the Community Development Department. Additionally, these community listening sessions gave residents an opportunity to ask questions and leave comments regarding the Housing Element and Measure SP. Where applicable, City staff was able to answer questions and provide clarification to residents' inquiries. Longer written responses were later prepared and posted on the Department's website.

On February 1, 2025, the City hosted a walking tour in the Downtown Mission Street and Fair Oaks areas. During this walking tour, the planning team shared local examples of higher density and heights, visited new multifamily and mixed use developments in the City, and visited the sites of proposed/approved housing developments and suitable sites included in the Housing Element. City staff and stakeholders discussed appropriate densities and heights in different areas as well as development standards that make higher heights and densities possible and palatable.

A second walking tour took place on February 15, 2025, in the Ostrich Farm and Huntington Drive areas. This walking tour covered the same topics as the first walking tour within the different contexts of these areas. Each walking tour was attended by approximately 40 stakeholders, including City Councilmembers and Planning Commissioners. Valuable feedback was collected during these walking tours and incorporated into the open houses held in February.

On February 18, 2025, the City hosted an open house to showcase the analysis prepared in regard to height limits in conjunction with housing density. The open house visuals included boards explaining the process, maps of the current and proposed zoning and density, examples of height studies conducted on development scenarios in the Huntington Drive, Ostrich Farm, Fair Oaks, and Mission Street areas, and an interactive board for participants to weigh in on their priorities as they related to density and height.

A second open house was held on March 18, 2025, this time focusing on current development standards that may factor into the challenges of developing housing, including: setbacks, stepbacks, building breaks, parking location, open space, and minimum unit sizes. The session featured a presentation, real-time polling activity to gauge reactions to the standards and a Q&A session. Both open houses were attended by approximately 40 stakeholders, whose input was considered in development of proposed standards for the Commission's consideration in its recommendation.

On March 11, 2025, the Planning Commission Chair appointed a sub-committee of two commissioners to study in depth the assumptions and methodology involved in the proposed rezoning. The sub-committee held a discussion with the full Commission on April 8, 2025, and worked with staff afterward to provide additional support for preparing for the Commission's recommendation hearing.

On March 26, 2025, the Planning Commission and City Council hosted a joint study session on Measure SP Implementation, to hear additional public comments and get feedback and direction for preparation of the draft amendments to the Land Use Element, Housing Element, Downtown Specific Plan, and Zoning Code.

Planning Commission Hearings and Planning Commission Community Meeting

From April to June 2025 the Planning Commission held four public hearings focusing on the density, height, and development standard recommendations the Commission will be sending to City Council for consideration and approval. In early June 2025, when the Planning Commission identified their favored recommendations, the Planning Commission and City hosted a final community meeting on the 16th. This final community meeting allowed members of the public to weigh in on the Planning Commission's recommendations. The Planning Commission held a public hearing on June 24th, 2025 to finalize their recommendations and officially send them along to City Council. The City Council held two readings of the Housing Element in August and September, the first on August 20th, 2025 and the second on September 3rd, 2025. On September 3rd, 2025 the City Council adopted the draft amended Housing Element.

6.2.5 California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that local jurisdictions evaluate the environmental impacts of any General Plan Update. The City has prepared a Program Environmental Impact Report (PEIR) for certification prior to adoption of the General Plan Update, Downtown Specific Plan and Housing Element.

6.2.6 Relationship to Other General Plan Elements

The City of South Pasadena General Plan consists of seven elements: (1) Land Use & Community Design; (2) Circulation & Accessibility; (3) Economic Development & Revitalization Element; (4) Historic Preservation; (5) Open Space & Resource Conservation; (6) Housing; and (7) Safety & Noise. The Housing Element builds upon the other General Plan elements and is consistent with the policies and goals set forth by the entire General Plan. The City is currently partway through a comprehensive update to its General Plan. All of the other elements of the General Plan are currently being updated for consistency with recent updates to state law, including those related to environmental justice, a new General Plan requirement since the City last conducted a comprehensive General Plan Update. South Pasadena does not need to conduct an analysis in response to Senate Bill (SB) 244 because the City's sphere of influence is coterminous with the City limit, so no residential communities exist within the sphere of influence. In addition, the City will review for and confirm

internal consistency as part of its annual general plan implementation report required under Government Code section 65400.

6.3 HOUSING NEEDS ASSESSMENT

Ensuring the availability of adequate housing for all social and economic sectors of the City's present and future population is an important goal for South Pasadena. An analysis to determine the programs needed to plan for housing for the community must be based on data that describes the current population and depicts current housing conditions. The following section of the Housing Element describes and analyzes the current demographic, socio-economic, and housing characteristics of South Pasadena in an effort to determine the nature and extent of the City's specific housing needs.

Data sources include the US Census, which is completed every 10 years, and is the preferred data source, as it provides the most reliable and in-depth data for demographic characteristics of a locality. This report uses the US Census American Community Survey (ACS) data to assess changes since the year 2010 because the data sets required for the Housing Element were not available from the 2020 US Census at the time this document was prepared.

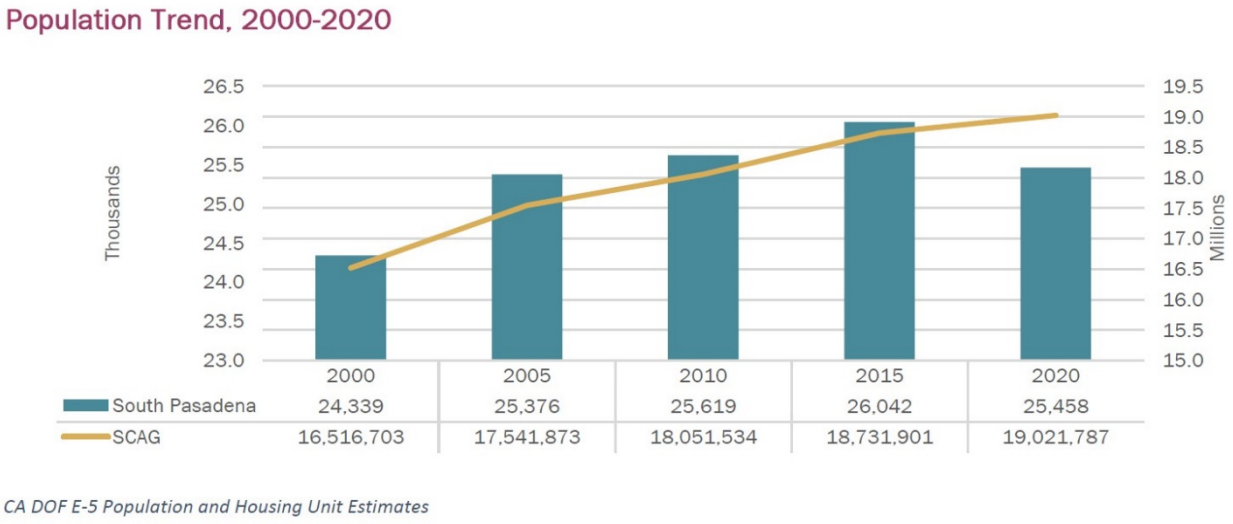
The ACS provides estimates of numerous housing-related indictors based on samples averaged over a five-year period. Whereas the US Census provides complete counts of various demographic indicators, the ACS provides estimates based on statistically significant samples. Due to smaller sample sizes, the estimates reported by the ACS can have large margins of error. Where ACS data is used, the numbers should not be interpreted as absolute fact, but rather as a tool to illustrate general proportion or scale. The California Department of Finance (DOF) is another source of data that is more current than the census. However, the DOF does not provide the depth of information that can be found in the US Census. SCAG released data for Housing Elements in late 2020, and selective data from that data packet has also been used in this section. When reviewing the data in this section, it should be noted that numbers for the same type of data (e.g., households) may not exactly match in different tables and sections because of the various data sources and samples used.

6.3.1 Community Profile

The characteristics of a city's population are important factors affecting the housing market in the community. Issues such as population growth, age, race, ethnicity, and employment all help determine the city's housing needs. Table VI-3 compares the population estimates of the City of South Pasadena and Los Angeles County from 1970 to 2019 and shows the projected increase in population growth by 2045. The 1970, 1980, 1990, 2000, and 2010 figures are provided by the U.S. Census and the 2019 figures are an estimate provided by the California DOF. The 2045 figure comes from SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City's population increased between 1970 and 2019 by 14.2 percent with an average annual growth of 0.2 percent. In 2019, the City's population was 26,245. The City's population has represented a small percentage of the County's population at an average of 3 percent since 1970. Since 2010, however, the City's share of the County's population has substantially decreased, indicating that South Pasadena has grown at a slower rate than many other jurisdictions in the County. From the high-level regional perspective provided by SCAG in its local housing data profile for South

Pasadena, the city experienced continuous population growth through from 2000 to 2015, increasing by an average of 2.3 percent every five years across this 15-year period, until the population declined slightly by approximately 2.2 percent from 2015 to 2020. The six-county jurisdictional area of SCAG as a whole, on the other hand, has continued to see continuous population growth rate from the beginning of the 21st Century to the year 2020, increasing by an average of 3.6 percent every five years across this 20-year period. Overall, from 2000 to 2020 both the city and the SCAG region saw their populations increase by approximately 4.6 percent and 15.2 percent, respectively. Figure VI-1is a chart from SCAG's Pre-Certified Local Housing Data prepared for South Pasadena showing the population growth trends for the city and compares them with the entire SCAG region. Based on projections from SCAG in the 2020 Regional Transportation Plan/Sustainable Communities Strategy, by 2045, South Pasadena's population could increase to 27,200 residents, an approximate 3.7 percent increase from 2019.

Figure VI-1
POPULATION GROWTH TRENDS: SOUTH PASADENA AND SCAG* REGION



Source: SCAG, Pre-Certified Local Housing Data – South Pasadena, 2021
*SCAG includes all city and county governments located within boundaries of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties.

Table VI-3
HISTORIC POPULATION ESTIMATES AND FUTURE PROJECTION
1970 – 2045

YEAR	CITY OF SOUTH PASADENA			LOS ANGELES COUNTY	
	POPULATION	PERCENTAGE OF COUNTY	AVERAGE ANNUAL GROWTH	POPULATION	AVERAGE ANNUAL GROWTH
1970	22,979	3%		7,041,980	
1980	22,681	3%	-0.1%	7,477,421	0.6%
1990	23,936	3%	.06%	8,832,500	1.8%
2000	24,292	3%	0.2%	9,519,338	0.8%
2010	25,619	3%	0.5%	9,818,605	0.3%

2019	26,245	0.3%	0.3%	10,253,716	0.5%
Average	--	3%	0.2%	--	0.8%
2045	27,200	0.2%	--	11,673,600	--

Source: U.S. Census - California DOF, SCAG 2020 RTP/SCS

Table VI-4 describes the population's age composition as provided by the 2010 U.S. Census and 2015-2019 ACS. According to the 2019 ACS, persons aged 18 to 69 make up the largest age demographic (67 percent) in the City, followed by youth ages 0 to 17 (26.1 percent). The median age of the City's population as of 2019 was 40.1 years.

Table VI-4
POPULATION CHARACTERISTICS

CITY OF SOUTH PASADENA	2010		2019		
	PERSONS	% POP.		PERSONS	% POP.
Total Population:	25,619	100%	Total Population:	25,661	100%
Age Structure:			Age Structure:		
0-17	3,354	23%	0-9	3,453	13%
			10-19	3,234	13%
18-69	16,032	67%	20-29	2,416	9%
			30-39	3,667	14%
			40-49	4,693	18%
			50-59	3,424	13%
			60-69	2,465	10%
65+	2,772	12%	70-79	1,313	5%
			80+	996	4%
Median Age:	40.1	--	Median age (years)	40.1	--

Source: 2010 U.S. Census and 2015-2019 ACS S0101: Age and Sex

Table VI-5 describes the population's racial and ethnic composition as provided by the 2015-2019 ACS. According to the 2019 ACS, white residents made up a slight majority (55.5 percent) of all residents, which is slightly higher than the overall countywide portion of white residents at 51.3 percent. Black or African American residents make up 3.6 percent of the population, lower than the countywide portion of Black or African American residents at 8.1 percent. Asian residents comprise 30.5 percent of the city's population, more than twice the countywide rate of 14.6 percent. In both the American Indian and Alaska Native as well as the Native Hawaiian and Other Pacific Islander groups, these residents consist of less than one percent of both the city's and county's populations. In terms of ethnicity, 18.5 percent of South Pasadena's residents claim Hispanic ethnicity, far lower than the 48.5 percent of the county's population that claims Hispanic ethnicity.

Table VI-5
RACE AND ETHNICITY CHARACTERISTICS

RACE OR ETHNICITY	CITY OF SOUTH PASADENA		LA COUNTY	
Race	**POPULATION**	**PERCENT OF CITY**	**POPULATION**	**PERCENT OF COUNTY**
White	14,239	55.5%	5,168,443	51.3%
Black or African American	922	3.6%	820,478	8.1%
American Indian and Alaska Native	59	0.2%	73,393	0.7%
Asian	7,818	30.5%	1,473,221	14.6%
Native Hawaiian and Other Pacific Islander	0	<1%	27,720	<1%
Some Other Race or Two or More Races	2,623	10.2%	2,518,315	25.0%
ETHNICITY	--	--	--	--
Hispanic	4,745	18.5%	4,888,434	48.5%
Non-Hispanic	20,916	81.5%	5193136	51.5%
Total Population	25,661	100.0%	10,081,570	100.0%

Source: 2015-2019 ACS DP05: Demographics and Housing Estimates

6.3.2 Employment Trends

According to the 2015-2019 ACS, 14,041 South Pasadena residents were in the labor force. The labor force includes employed and unemployed persons aged 16 years and over. Table VI-6 describes the City's 2019 employment trends. At approximately 30 percent, the educational services, and health care and social assistance sector employs the largest section of the City's employed population. The second-largest employment sector, professional, scientific, and management, and administrative and waste management services, accounts for approximately 17 percent of the City's employed population. Table VI-7 shows the City's anticipated growth in employment for 2045 and relies upon SCAG's regional projections from its 2020 RTP/SCS. According to SCAG's 2020 RTP/SCS, South Pasadena's employed persons totaled approximately 11,400 in the RTP/SCS's baseline year of 2016 and it expects that this number will grow by approximately 6 percent to 12,100 by the projection horizon year of 2045.

Table VI-6
2019 OCCUPATIONS
EMPLOYED PERSONS 16 YEARS OF AGE AND OVER

OCCUPATION, CITY OF SOUTH PASADENA	PERSONS	PERCENTAGE OF TOTAL
Agriculture, forestry, fishing and hunting, and mining	43	<1%
Construction	449	3%
Manufacturing	520	4%
Wholesale trade	420	3%
Retail trade	998	7%
Transportation and warehousing, and utilities	496	4%
Information	771	6%
Finance and insurance, and real estate and rental and leasing	1,179	9%
Professional, scientific, and management, and administrative and waste management services	2,247	17%
Educational services, and health care and social assistance	4,036	30%
Arts, entertainment, and recreation, and accommodation and food services	1,111	8%
Other services, except public administration	729	5%
Public administration	487	4%
Civilian employed population 16 years and over	13,486	100%

Source: 2015-2019 ACS DP03: Selected Economic Characteristics

Table VI-7
2045 EMPLOYMENT PROJECTIONS
SOUTH PASADENA AND LOS ANGELES COUNTY

YEAR	CITY OF SOUTH PASADENA		LOS ANGELES COUNTY
	EMPLOYMENT	PERCENTAGE OF LOS ANGLES COUNTY	
2016 (Baseline)	11,400	0.2%	4,743,800
2045 (Horizon)	12,100	0.2%	5,382,200

Source: 2020 SCAG RTP/SCS

South Pasadena is primarily a suburban residential community with a relatively small employment base. It is not anticipated that employment growth within the City will be a major stimulus to housing demand.

A general measure of the balance of a community's employment opportunities with the needs of its residents is through a "jobs-housing balance" test. A balanced community would have a match between employment and housing opportunities allowing most of the residents to work in the community. Data from the ACS and the U.S. Census Bureau's OnTheMap tool indicate that there is a ratio of 0.56 jobs-to-housing balance. In other words, there are only 7,560 jobs within South Pasadena for the City's employed labor force of 13,486.

6.3.3 Household Characteristics

The characteristics of a community's households provide important information about the housing needs in the community. Income and affordability are best measured and examined at the household level, as are the special needs of certain groups, such as large-family households or female-headed households.

Household Composition and Size

The U.S. Census defines a "household" as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing living quarters. Persons living in retirement or convalescent homes, dormitories, or other group situations are not considered households. Household characteristics are important indicators of the type and size of housing needed in a city.

According to the 2015-2019 ACS, approximately 74 percent of the 9,827 households in South Pasadena in 2019 consisted of two or more persons (see Table VI-8). Single-person households comprised an approximate 26 percent and two-person households represented approximately 28 percent of all households, representing the largest segments of households in South Pasadena.

Table VI-8
PERSONS PER HOUSEHOLD – 2019

PERSONS PER HOUSEHOLD	2010 SOUTH PASADENA	PERCENTAGE	2019 SOUTH PASADENA	PERCENTAGE	2019 LA COUNTY	PERCENTAGE
1 person	3,016	29.20%	2,530	26%	851,304	26%
2 persons	3,235	31.40%	3,042	31%	931,426	28%
3 persons	1,998	19.40%	1,882	19%	559,373	17%
4 persons	1,488	14.40%	1,805	18%	500,882	15%
5 persons	470	4.50%	466	5%	263,210	8%
6 persons	70	0.70%	66	1%	115,989	3%
7 or more persons	41	0.40%	36	<1%	94,611	3%
Total	**10,318**	**100%**	**9,827**	**100%**	**3,316,795**	**100%**

Source: 2010 U.S. Census Matrix H 13 Household size (SF 1) and 2015-2019 ACS B25009: Tenure by Household Size

Household size is defined as the number of persons living in a housing unit. A visible change in the average household size over time reflects a change in the household composition of a city. For example, a city's average household size will increase over time if there is a trend towards larger families. In a community with a growing number of senior households, the average household size will usually decline. Table VI-9 presents household size data from the California DOF for the City of South Pasadena and Los Angeles County.

Table VI-9
AVERAGE HOUSEHOLD SIZE

LOCATION	PERSONS PER HOUSEHOLD 2007	PERSONS PER HOUSEHOLD 2012	PERSONS PER HOUSEHOLD 2019
City of South Pasadena	**2.42**	**2.44**	**2.47**
Los Angeles County	3.13	2.99	3.01

Source: California DOF (2007, 2012, 2019)

Between 2007 and 2019, the average household size in South Pasadena increased slightly from 2.42 to 2.47 persons per household. This increase contrasts with Los Angeles County, which has experienced a decrease in average household size from 3.13 to 3.01 persons per household during the same time period. However, the average household size still remains below the county average.

Overcrowding

HCD defines overcrowding as more than one person per room, excluding bathrooms, kitchens, hallways, and porches. Overcrowding occurs primarily because households "double-up" to afford high rents and because of a lack of available housing units of adequate size to accommodate families with larger numbers of children. Units with more than 1.5 persons per room are considered severely overcrowded and should be recognized as a significant housing problem. Table VI-10 describes the number of persons per household for owner- and renter-occupied households in the City in 2018.

Table VI-10
TENURE BY HOUSEHOLD SIZE

	NUMBER	PERCENTAGE
Owner	**4,670**	**47%**
Householder Living Alone	823	18%
Households 2-4 persons	3,511	75%
Large Households 5+ persons	336	7%
Rental	**5,337**	**53%**
Householder Living Alone	1,965	37%
Households 2-4 persons	3,147	59%
Large Households 5+ persons	225	4%
Total	**10,007**	--
Householder Living Alone	2,788	28%
Households 2-4 persons	6,658	67%
Large Households 5+ persons	561	6%

Source: 2014-2018 ACS: B25009 Tenure by Household Size

Table VI-11 identifies the number of persons per room by owner and rental units. Approximately 97 percent of all occupied units had one or less than one person per room in 2018. As a whole, South Pasadena had a relatively low rate of overcrowding in 2018 with approximately 2 percent of all households considered overcrowded, and only 1 percent considered severely overcrowded. Of the renter-occupied units, 213 units (about 4 percent) were overcrowded, and 66 (about 1 percent) were

severely overcrowded. Of the owner-occupied units, 42 units (less than 1 percent) were overcrowded, and 18 units were severely overcrowded. Given such low percentages, it is evident that overcrowding is not a significant housing problem in South Pasadena.

Table VI-11
PERSONS PER ROOM

PERSONS PER ROOM	OWNER-OCCUPIED		RENTER-OCCUPIED		TOTAL	OCCUPIED
	UNITS	%	UNITS	%	UNITS	%
0.50 or Less	3,478	74%	3,044	57%	6,522	65%
0.51 to 1.00	1,150	25%	2,080	39%	3,230	32%
1.01 to 1.50	24	<1%	147	3%	171	2%
1.51 to 2.00	10	<1%	50	1%	60	1%
2.01 or More	8	<1%	16	<1%	24	<1%
Total	4,670	100%	5,337	100%	10,007	100%

Source: 2014-2018 ACS: B25014 Tenure by Occupants per Room

Household Income and Income Distribution

Income is a major factor influencing the demand for housing, and to a large extent, reflects the affordability of housing in a community. According to data obtained from the 2015-2019 ACS, the median household income for the City was $104,308, well above the County median of $68,044. Table VI-12 illustrates the distribution of household income by tenure for South Pasadena. About one-third of South Pasadena households were in the highest income category (more than $150,000), with more than half (52 percent) of owner-occupied households earning this level of income. The high end of the income threshold for extremely low income households is $33,800 (See Table VI-14). The data in Table VI-12 does not break out at that dollar amount so an estimate of extremely low income households is based on those making $34,999 or less in the data shown in Table VI-12. Based on that group, 10 percent of owner-occupied households and 19 percent of renter households are extremely low income.

Table VI-13 examines income distribution based on age of the householder, defined as the primary rent or mortgage payer in a household.

Table VI-12
2018 HOUSEHOLD INCOME BY TENURE

HOUSEHOLD INCOME	OWNER-OCCUPIED HOUSEHOLDS		RENTER-OCCUPIED HOUSEHOLDS		TOTAL HOUSEHOLDS	
	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE	NUMBER	PERCENTAGE
Less than $10,000	92	2%	346	7%	438	4%
$10,000 to $14,999	70	2%	94	2%	164	2%
$15,000 to $19,999	90	2%	188	4%	278	3%
$20,000 to $24,999	47	1%	80	2%	127	1%
$25,000 to $34,999	189	4%	282	5%	471	5%
$35,000 to $49,999	315	7%	306	6%	621	6%
$50,000 to $74,999	261	6%	941	18%	1202	12%
$75,000 to $99,999	462	10%	920	18%	1382	14%
$100,000 to $149,999	701	15%	1072	21%	1773	18%
$150,000 or more	2,432	52%	939	18%	3371	34%
Total Households	4,659	100%	5,168	100%	9,827	100%
So. Pasadena Median House-hold Income:	104,308					
LA County Median House-hold Income:	68,044					

Source: 2015-2019 ACS: DP03 Selected Economic Characteristics, B25118 Tenure by Household Income

Table VI-13
HOUSEHOLD INCOME BY AGE OF HOUSEHOLDER

INCOME	AGE OF HOUSEHOLDER									
	BELOW 25 YEARS		25 TO 44 YEARS		45 TO 64 YEARS		65 YEARS AND ABOVE		TOTAL	
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Less than $10,000	15	15%	173	5%	109	3%	141	7%	438	4%
$10,000 to $19,999	4	4%	90	3%	131	3%	217	10%	442	5%
$20,000 to $24,999	-	0%	33	1%	66	2%	28	1%	127	1%
$25,000 to $34,999	-	0%	128	4%	105	3%	232	11%	465	5%
$35,000 to $44,999	-	0%	98	3%	139	3%	173	8%	410	4%
$45,000 to $59,999	32	33%	221	6%	232	6%	134	6%	619	6%
$60,000 to $74,999	-	0%	353	10%	256	6%	185	9%	794	8%
$75,000 to $99,999	-	0%	489	14%	682	17%	211	10%	1,382	14%
$100,000 to $124,999	-	0%	361	10%	342	8%	229	11%	932	9%
$125,000 to $149,999	45	46%	344	10%	338	8%	114	5%	841	9%
$150,000 to $199,999	1	1%	359	10%	482	12%	194	9%	1,036	11%
$200,000 or more	-	0%	817	24%	1,209	30%	309	14%	2,335	24%

Total Households*	97	100%	3,466	100%	4,091	100%	2,167	100%	9,821	100%

*Due to sample size and margins of error in sampling, some of these totals may not reflect accurate counts and should be considered estimates.
Source: 2015-2019 ACS: B19037 Age of Householder by Household Income in the Past 12 Months

Support for Lower Income Households

For the purpose of determining eligibility for housing assistance through State, Federal and local programs, HCD publishes income limits for the following categories annually, as described in Table VI-14.

- Extremely low income: Household income of less than 30 percent of County median income.
- Very low income: Household income of 50 percent of the County median income.
- Low income: Household income between 50 and 80 percent of the County median income.
- Moderate income: Household income of 120 percent of the County median income limit.

Table VI-14 provides the 2020 income limits for Los Angeles County for these income categories.

Table VI-14
2020 INCOME LIMITS, LOS ANGELES COUNTY (4-PERSON HOUSEHOLD)

INCOME GROUP	INCOME LIMITS
Extremely Low Income	Income of $33,800 or less
Very Low Income	Income between $33,801 and $56,300
Low Income	Income between $56,301 and $90,100
Moderate Income	Income between $90,101 and $92,750
Above-Moderate Income	Income above $92,750
Area Median Income	*$77,300*

Source: HCD, Division of Housing Policy Development, April 30, 2020

According to 2021 data provided by HCD (ACS, 2019), South Pasadena has 879 extremely low-income households, representing an approximate 8.9 percent of all households in South Pasadena.

6.3.4 Regional Housing Needs Assessment

SCAG's RHNA process is conducted pursuant to the requirements of SB 375, which requires each Metropolitan Planning Organization (MPO) to create a "Sustainable Communities Strategy" (SCS) that demonstrates how the region will meet California's greenhouse gas emission targets through coordinated transportation and land use planning. SCAG's SCS generally allocates more housing near transit stations and along transit corridors, more housing in jobs-rich areas, and more jobs in housing-rich areas. The relatively high RHNA allocation for South Pasadena also results from the city's proximity to many jobs-rich areas, primarily Downtown Los Angeles, and its transit accessibility due to the L-Line station (formerly known as Gold Line).

SCAG's RHNA development process extended over more than a year and a half, beginning with hearings on proposed methodology in Summer 2019. The proposed methodology was discussed in an extensive public review process before receiving approval from HCD and adoption by the SCAG Regional Council on March 4, 2020. SCAG issued the draft RHNA allocation on September 3, 2020, with South Pasadena receiving 2,062 units (in addition to the existing 10,678 housing units in the city). The City of South Pasadena filed an appeal based on strong evidence that the number was not realistic given certain characteristics of the local geography and development patterns. However, the appeal was rejected, along with the vast majority of appeals filed by other cities in the SCAG region. A few other appeals were approved, resulting in a reallocation of units to other jurisdictions within the region. Through that process, five additional units were reallocated to South Pasadena, with a

final allocation of 2,067 units (see Table VI-15 below) in the Final RHNA that SCAG adopted on March 3, 2021.

The City must adopt this housing element with goals, policies and programs to include these 2,067 new units. This housing element has been developed to include goals, policies, and programs that are consistent with meeting the RHNA targets.

Over the eight-year period of this housing element, these goals, policies, and programs are designed to allow the market to provide units in all income categories, to meet the RHNA as a minimum goal. Based on the SCAG 2021-2029 RHNA, South Pasadena needs 2,067 new units, distributed across the four income levels established by HCD.

Table VI-15 identifies South Pasadena's housing need by income group.

Table VI-15
SOUTH PASADENA REGIONAL HOUSING NEEDS ASSESSMENT 2021-2029

INCOME GROUP	NUMBER OF NEW UNITS	PERCENTAGE
Very Low Income	757	37%
Low Income	398	19%
Moderate Income	334	16%
Above-Moderate Income	578	28%
Total	**2,067**	**100%**

Source: SCAG RHNA, Adopted March 3, 2021

To clarify the requirements of state law concerning the RHNA allocation and the housing element, no city is not obligated to *construct* any of the units, but rather cities are required to establish goals, plans and programs that realistically encourage the private sector to develop the RHNA allocation.

6.3.5 Extremely Low-Income Households

Extremely low income households are defined as those with incomes less than 30 percent of the area median income, or AMI (Table VI-14, above). Extremely low-income households generally tend to experience housing insecurity and need assistance to obtain affordable housing. For example, most families and individuals whose sole source of income is from public assistance, such as social security insurance (SSI) or disability insurance live on extremely low-incomes. Households supported by a California minimum wage worker, even full-time, may fall into the extremely low-income category. According to Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 data provided by HUD, approximately 77 percent of extremely low-income renter households in South Pasadena paid more than 30 percent of their income for housing and approximately 85 percent of extremely low-income homeowner households paid more than 30 percent of their income for housing (Table VI-15).

For purposes of the Housing Element, it is assumed that 50 percent of the City's RHNA allocation of 757 very low-income units (378 units) represents the additional housing needed to be provided for extremely low-income households. Some extremely low-income households could include household members with mental, physical or developmental disabilities, and special needs. A single senior citizen on a limited amount of fixed income, such as SSI, could also be considered extremely low income. As detailed earlier in this chapter, a greater percentage of extremely low-income households in the city are renter households. Extremely low income households are second only to very low income

households in terms of paying more than 30 percent of monthly income towards housing. To address the needs of extremely low-income households with mental, physical, or developmental disabilities, the Housing Element includes a program for providing for housing types for this special-needs group (see Program 2.h) in addition to other programs that would also address extremely low-income households (Programs 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance, Program 2.f - Offer Services to People without Housing, Program 2.g – Expand Senior Housing, ~~Program 2.j – General Plan Affordable Housing Overlay, Program 2.k – Affordable Housing Overlay Zone,~~ Program 3.f – Allow and Facilitate ADUs and the other ADU-related programs, Program 4.a – Land Use Controls – Emergency Shelters, Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers, Program 4.d – ADA Accessibility Standards, Program 4.e – Universal Design, and Program 5.a - Fair Housing Education, Outreach, and Services)

In recent years, the City undertook the following actions to support extremely low-income households, including those experiencing homelessness and the lowest-income households in the City:

- The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.
- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
- The City adopted an amendment to the Zoning Code to add clarifying language to the definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This will be amended to continue to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.
- Housing Choice Vouchers: Information about Section 8 vouchers, accessible through Los Angeles County, is available on the City's website with this link to County website: https://www.southpasadenaca.gov/residents/housing/.
- The "Housing" webpage was relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program.

- HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. According to LACDA, there are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.
- Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.

6.3.6 Special-Needs Groups

Households with special housing needs as defined under state housing element law include disabled persons (including those with developmental disabilities), seniors, large households, farmworkers, single-parent households, and the homeless. Table VI-16 summarizes the numbers of households or persons in each of these special-needs groups in South Pasadena in 2018. The point in time count of persons experiencing homelessness was last collected in 2020. Additional analysis of each of these special needs groups follows.

Table VI-16
HOUSEHOLDS WITH SPECIAL HOUSING NEEDS

SPECIAL NEEDS GROUP	NUMBER OF PERSONS OR HOUSEHOLDS	% OF TOTAL POPULATION OR TOTAL HOUSEHOLDS
Senior Households**	2,167	22.1%
Large households - 5 or more members	561	5.6%
Single-parent households	766	7.7%
Persons age 18 or over with a disability**	1,750 (18 to 64 years 700 or 2.7% 65 and over 393 or 1.5%)	6.9%
Persons employed in agriculture, forestry, and fishing occupations**	43	<1%
Unhoused (Homeless) persons*	15	<1%

Source: ACS, 2014-2018-2011: B17012 Poverty Status in the Past 12 Months of Families by Household Type by Number of Related Children Under 18 Years; B25009 Tenure by Household Size;
**2015-2019: B25007 Tenure by Age of Householder; DP03 Selected Economic Characteristics; S1810 Disability Characteristics;* Los Angeles Homeless Services Authority Point-in-Time Count 2020

Persons with Disabilities

The Americans with Disability Act (ADA) defines a disability as a physical or mental impairment that substantially limits one or more major life activities. This segment of the population, which includes individuals with mental, physical, and developmental disabilities, needs affordable housing that is conveniently located to essential services and, where necessary, has been specially adapted for accessibility or other accommodations such as wheelchair ramps, elevators, wide doorways, and modified fixtures, cabinetry, and appliances. Other appropriate features of housing for persons with physical disabilities include very low-cost units in large group home settings near retail services and public transit, supervised apartment settings with on- or off-site support services, outpatient/day

treatment programs, inpatient/day treatment programs, single-room occupancy units, crisis shelters, and transitional housing.

Most people with disabilities live on an income that is significantly lower than the non-disabled population, which severely limits their ability to pay for housing. Persons with disabilities have higher rates of unemployment relative to other groups. For most, their only source of income is a small fixed pension afforded by Social Security Disability Insurance (SDI), SSI, or Social Security Old Age and Survivor's Insurance (SSA), which, in many cases, does not adequately cover the cost of rent and living expenses, even when shared with a roommate. In addition, persons with disabilities oftentimes experience discrimination in hiring and training. Employment can tend to be unstable and at the lower-wage brackets.

The 2015-2019 ACS identified 1,750 persons aged 18 and over living with a disability (3,569 disabilities tallied) in the City of South Pasadena. Of these, 700 are between the ages of 18 and 64 (1,217 disabilities tallied) and 393 are 65 and older (2,352 disabilities tallied). The most common disabilities in South Pasadena for those under 65 are cognitive disabilities (319), followed by independent living disabilities (248), and ambulatory disabilities (225). Among seniors, the most common disabilities include ambulatory disabilities (743), followed by independent living disabilities (546), and hearing disabilities (393). In 2019, there were 441 employed and 16 unemployed persons with disabilities in the City's labor force, representing about 3 percent of the City's working-age population. There were also 243 persons with disabilities, or 2 percent of the City's working-age population, that were not in the City's labor force. Table VI-17 provides information about South Pasadena residents with disabilities by disability type and age. Table VI-18 demonstrates the employment characteristics of this group within the context of the overall South Pasadena labor force.

Table VI-17
DISABILITIES BY TYPE AND AGE OF RESIDENT

Total Disabilities Tallied	**3,854**
Total Disabilities Tallied for People 17 Years or Under:	**285**
Hearing Difficulty	6
Vision Difficulty	12
Cognitive Difficulty	222
Ambulatory Difficulty	0
Self-Care Difficulty	45
Total Disabilities Tallied for People 18 to 64 Years:	**1,217**
Hearing Difficulty	204
Vision Difficulty	147
Cognitive Difficulty	319
Ambulatory Difficulty	225
Self-Care Difficulty	74
Independent Living Difficulty	248
Total Disabilities Tallied for People 65 Years and Over:	**2,352**
Hearing Difficulty	393
Vision Difficulty	186
Cognitive Difficulty	167
Ambulatory Difficulty	743
Self-Care Difficulty	317
Independent Living Difficulty	546

Source: 2015-2019 ACS: S1810 Disability Characteristics.

Table VI-18
EMPLOYMENT AMONG POPULATION WITH DISABILITY

POPULATION GROUP	NUMBER	PERCENTAGE
Total Population Ages 18 to 64	**15,748**	**100%**
In the labor force	**13,269**	**84%**
Employed	*12,714*	*81%*
With a disability	441	3%
No disability	12,273	78%
Unemployed	555	4%
With a disability	16	<1%
No disability	539	3%
Not in the labor force	**2,479**	**16%**
With a disability	243	2%
No disability	2,236	14%

Source: ACS, 2015-2019: S1810 Disability Characteristics

Consistent with California law, group homes or residential care facilities with six or fewer residents per facility are allowed by right in all of South Pasadena's residential zones. However, group homes or residential care facilities with seven or more persons require a conditional use permit in the RM and RH residential districts. As part of the approval of conditional use permits for residential care facilities, the City is able to grant an exception to the parking requirements established in the Zoning Code. As part of Program 5.b, to address new state fair housing requirements, the City will amend the zoning code to allow residential care facilities with seven or more persons to be permitted with the same requirements that apply to other residential uses in the same zone.

Housing opportunities for individuals with physical disabilities can be addressed through the provision of affordable, barrier-free housing. Currently, such units are in limited supply in South Pasadena due to the large proportion of older housing stock built under previous codes. In addition to the development of new accessible units, rehabilitation assistance can be provided to renters and homeowners with disabilities to modify existing units to improve accessibility. The living arrangements needed by persons with disabilities depend on the severity of the disability. While some living with disabilities may live at home in an independent environment with family support, others may require assistance to maintain independent living. This can be provided in the form of special housing design features for those with physical disabilities, income support for those who are unable to work, and in-home supportive services for persons with medical conditions. Accessible housing can also be provided through senior housing developments.

In 1982 (and effective since September 15, 1984), Title 24 of the California Uniform Building Code mandated that all multifamily residential construction projects containing more than five units conform to specific disabled adaptability/accessibility regulations. In 1988, the federal government enacted the U.S. Fair Housing Amendment Act, with the intent of increasing the number of accessible rental units. In July 1993, the State of California issued "California Multifamily Access Requirements" based upon this Act. Both federal and state housing laws require certain features of adaptive design for physical accessibility in new multifamily residential buildings with four or more units built for first occupancy starting March 13, 1991. However, numerous buildings built before these state and federal mandates do not comply with these standards. These laws do not apply in many cases to assist individuals, particularly seniors who "age in place" in their homes rather than move to assisted living facilities and/or other newly constructed units.

The City ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal requirements for accessibility as part of its building plan check and inspection process. The City does not require special building codes or onerous project review to construct, improve, or convert housing for persons with disabilities. Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land-use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to allow covered ramps in the setbacks of properties that have already been developed to accommodate residents with mobility impairments. In 2013, South Pasadena amended the Zoning Code to establish a process for reasonable accommodations (SPMC Section 36.410.110). (See also Section 6.6 Housing Development Resources).

The physical modification of housing is not necessary to accommodate persons with other kinds of disabilities (non-physical disabilities), but they generally require special services and monetary support. Since jobs and higher earning potential are often limited for such individuals, affordable housing is important to maintain their quality of life. Group homes with a live-in resident assistant may be one solution for providing affordable housing to those with non-physical disabilities.

Persons with Developmental Disabilities

State law also requires that the Housing Element address the housing needs of persons with developmental disabilities. As defined by federal law, "developmental disability" means a severe, chronic disability of an individual that originates before an individual is 18 years old, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual, which includes mental retardation, cerebral palsy, epilepsy, and autism. Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. The Eastern Los Angeles Regional Center serves residents with developmental disabilities in South Pasadena and the surrounding cities. Table VI-19 provides the number of persons in South Pasadena with a developmental disability in 2019 by type of residence.

Table VI-19
PERSONS WITH DEVELOPMENTAL DISABILITIES BY RESIDENCE TYPE

RESIDENCE TYPE	PATIENT COUNT*
Home of Parent/Family/Guardian	178
Independent/Supported Living	<11
Community Care Facility	<11
Intermediate Care Facility	0
Foster/Family Home	0
Other	0
Total Residential Population	**180 to 198**

Source: California Department of Developmental Services – Consumer Count by California ZIP Code and Residence Type: ZIP Code 91030 September 2019

*Because the California Department of Developmental Services does not provide data in amounts smaller than 11 patients per category, the real count of patients living with a disability cannot be definitively determined. As such, the total count is reported as a range based on the data available.

Housing types appropriate for people living with a developmental disability include rent-subsidized homes, licensed and unlicensed single-family homes, and group homes. Programs appropriate for providing housing for developmentally disabled persons include Section 8 vouchers, inclusionary housing, special programs for home purchase, U.S. Department of Housing and Urban Development (HUD) housing, and SB 962 homes. Considerations that are important in serving this need group include the design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities. Program 2.h in the Housing Element addresses the needs of those in the South Pasadena community with developmental disabilities.

Senior Households

Many senior households, defined as those with at least one member over the age of 65, at some point will have special needs due to relatively low fixed incomes, physical and mental disabilities, health problems requiring hospitalization or ongoing treatment, and other issues that result in increasing dependency on family or caretakers. Although many seniors continue to drive into their 70s or beyond, many begin to rely on public transportation at some point, particularly those with disabilities. While some data sources reference seniors as one group, the need for support becomes more acute as people age within the cohort.

According to the 2015-2019 ACS, in 2019, the City of South Pasadena had 3,574 persons aged 65 and over, of which 2,167 were "householders," the primary rent or mortgage payer in a household. The senior population represents approximately 19 percent of the total City population and 22.1% of its households, but as shown in Table VI-20, they comprise 34% of the homeowner households. Approximately 16 percent of South Pasadena households that own their homes are over the age of 75. Overall, 1,593 or 74 percent of senior households in the City own their owned homes and 574 households or 26 percent of the City's senior households rent. In 2019, 39 percent of senior-headed households earned an income of $100,000 or more. Approximately, 51 percent earned an income that exceeded the Los Angeles County 2020 median income of $77,300, whereas an approximate 49 percent of senior households earned an income below the median income for the County. Out of the total 2,167 senior households in South Pasadena recorded in 2019, 791, or an approximate 37 percent, earned an income that was below the very-low income limit of $45,050 for a two-person household in Los Angeles County. As seen in the data below, those seniors are likely a significant cohort of the households who own their own homes in South Pasadena and are overburdened by housing costs.

Table VI-20
HOUSING UNIT TENURE BY AGE OF HEAD HOUSEHOLDER

AGE	UNITS	PERCENT
OWNER-OCCUPIED		
15 to 24 Years	0	0%
25 to 44 Years	811	17%
45 to 64 Years	2,255	48%
65 Years or older	1593	34%
Total Units	4,659	100%
RENTER-OCCUPIED		
15 to 24 Years	103	2%
25 to 44 Years	2,655	51%
45 to 64 Years	1,836	36%
65 Years or older	574	11%
Total Units	5,168	100%

HOUSEHOLD INCOME	SENIOR HOUSEHOLDS	PERCENT
Less than $25,000	386	18%
$25,000 to $59,999	539	25%
$60,000 to $99,999	396	18%
$100,000 or more	846	39%
Total Senior Householders	2,167	100%
Total Households	9,827	22.1% (Senior Households of all Households)

Source: 2015-2019 ACS: B25007 Tenure by Age of Householder; B25009 Age of Householder by Household Income in the Past 12 Months

Senior housing needs typically include affordable housing close to commercial shopping areas, medical facilities, and public transportation services. As shown above, single-family homes are disproportionately occupied today by seniors. Although many seniors opt to age in place and can afford to remain in their homes, others will need to find different accommodations at some point due to the economic or the functional burden of home ownership. This underscores the necessity of building appropriate housing types within the South Pasadena community that would offer more attractive and convenient options for seniors to support decisions to downsize. As more seniors vacate single-family housing units, this housing stock would become more available for larger households.

Considering its relatively small size, South Pasadena offers a fair number of apartment complexes and assisted living facilities for senior residents for its relatively small population. Senior living facilities include the Golden Oaks Apartments with 65 independent living units, Meridian Manor with 6 beds for assisted living, and Prospect Manor with 99 beds for assisted living.

Since 1982, the South Pasadena Senior Citizens' Center has served as a meeting place for services and activities for the community's seniors and others living with disabilities that require similar support services. Although closed for an extended period during the COVID-19 pandemic, the center reopened on June 7, 2021, and continues to operate with support from the City and the non-profit Senior Citizens Foundation of South Pasadena and other community sponsors. Center programs and activities are designed to enhance and support senior citizen independence and encourage involvement in and with the community.

The wide range of services offered at the Senior Citizens' Center include daily lunches, interest classes, recreational activities, and health services, such as health assessments and blood pressure measurement. The City also operates a Dial-A-Ride Program through the Senior Citizens' Center, providing South Pasadena senior citizens transportation anywhere within the City limits, to nearby medical offices, grocery stores, and to Huntington Memorial Hospital. The Senior Citizens' Center also operates a Meals-On-Wheels program for qualifying individuals.

Group homes with a live-in resident assistant may be one solution to providing affordable housing to seniors. Consistent with California law, group homes with six or fewer residents per facility are allowed by right in all residential zones of the City. Residential Care Facilities for the Elderly (RCFE) are permitted in the RM and RH residential districts, subject to approval of a conditional-use permit. As part of the approval of conditional-use permits for RCFE facilities, the City is able to provide an exception to the parking requirements established in the Zoning Code for projects accommodating senior citizens. Note, that to address constraints related to review of residential care facilities, Program 5.b is proposed to remove discretionary review of large residential care facilities.

Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through agricultural labor. They have special housing needs because of their relatively low income and in some cases, the unstable seasonal nature of their job.

As indicated in Table VI-15, the 2014-2018 ACS identifies 54 individuals in South Pasadena employed in the category of agriculture, forestry, and fishing occupations, which accounted for less than one percent of the City's employed residents. Given that there are so few persons employed in agricultural-related industries, the City can address their housing needs through its overall programs for housing affordability, and there is no need to create and administer a special program targeting farmworkers. However, farmworkers are addressed under Program 2.h which serves all Special Needs groups in the City.

Large Households

Large households are those consisting of five or more persons. Large families can have special housing needs if they cannot find affordable large housing units. In that case, their living conditions may become overcrowded.

The highest percentage of owner-occupied housing units is for a two-person unit (35 percent). About 7 percent of the owner-occupied households are occupied by five or more persons. For renter-occupied units, one-person households are the most common (37 percent). About 4 percent of the renter-occupied units are occupied by five or more persons. These numbers are generally low compared to the County as a whole. In Los Angeles County, the occurrence of households with five or more members is 15 percent for owner-occupied units and 13 percent for renter-occupied units. Program 2.h addresses the needs of large households.

Single-Parent Households

The housing needs of single parents may differ from two-parent households and should be considered as new housing is developed based on the programs of this housing element. Such households have a greater need for housing with convenient access to childcare facilities, public transportation, and other public facilities and services. Because the earning power of single-parent households is generally less than that of two-parent households that have potential for more than one income, single parents constitute a "special needs" group as they will tend to spend a higher percentage of their household income on housing that meets their families' needs. In particular, women's incomes continue to be statistically lower than their male counterparts despite some advancements made in recent years, and the historic discrimination in pay levels impacts the ability of female-headed single-parent households to afford appropriate housing.

Table VI-21 provides a detailed breakdown of the City of South Pasadena's household composition in 2018. The total number of single-parent households with children in South Pasadena is 766, approximately 12 percent of all family households in the City. This represents a decline of approximately 17 percent from the 924 single-parent households reported in 2010. Female-headed households with children represent 480 or approximately 8 percent of all family households. Male-headed households with children represent 286 or approximately 4 percent of all family households. Specifically, female householders with children declined by an approximate 31 percent from 2010 to 2018. Female householders with no children also declined approximately 21 percent over the same period. Single-male householders with children, on the other hand, increased approximately 24 percent from 2010 to 2018, though male-headed households without children declined by

approximately 19 percent over the same period. These contrasting trends indicate that all kinds of female-headed households have chosen to leave South Pasadena along with single-male householders without children over the last decade though the motivations for these decisions are unknown. Housing opportunities for lower-income single-parent households with children can primarily be addressed through rental assistance and the provision of affordable rental units. Program 2.d specifically addresses the need for vouchers for rental assistance and multiple other programs in this Housing Element address the provision of affordable rental units.

Table VI-21
FAMILY HOUSEHOLD COMPOSITION

FAMILY HOUSEHOLD SIZE AND TYPE	NO. OF FAMILIES	% TOTAL FAMILIES
Total Households (including family households)	**10,007**	**--**
Total Families	**6,388**	**100%**
Two or More Persons in Family Households:	**5,757**	**90%**
Married Couple with Related Children	2,782	44%
Married Couple with No Related Children	2,209	35%
Female Householder, No Husband Present with Related Children	480	8%
Male Householder, No Wife Present with Related Children	286	4%
Unmarried Householders with No Related Children	**631**	**10%**
Female Householder, No Husband Present with No Related Children	451	7%
Male Householder, No Wife Present with No Related Children	180	3%
Total Families below the Poverty Level	**333**	**5%**
Female-Headed Households below Poverty Level	109	2%
Male-Headed Households below Poverty Level	156	2%

Source: 2014-2018 ACS: B17012 Poverty Status in the Past 12 Months of Families by Household Type by Number of Related children Under 18 Years

Unhoused (Homeless) Persons

In February 2022, the Greater Los Angeles Homeless Count was conducted by the Los Angeles Homeless Services Authority (LAHSA) in South Pasadena. This Point in Time (PIT) study identified a total population of 50 unsheltered persons in the seven census tracts that comprise the City (Figure VI-2). This represents an increase of 35 individuals from the 2020 PIT count. The City has zero unhoused residents in shelters. Program 4.a has been updated to ensure that the Code allows for emergency shelters to accommodate the increased number.

Figure VI-2
2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA

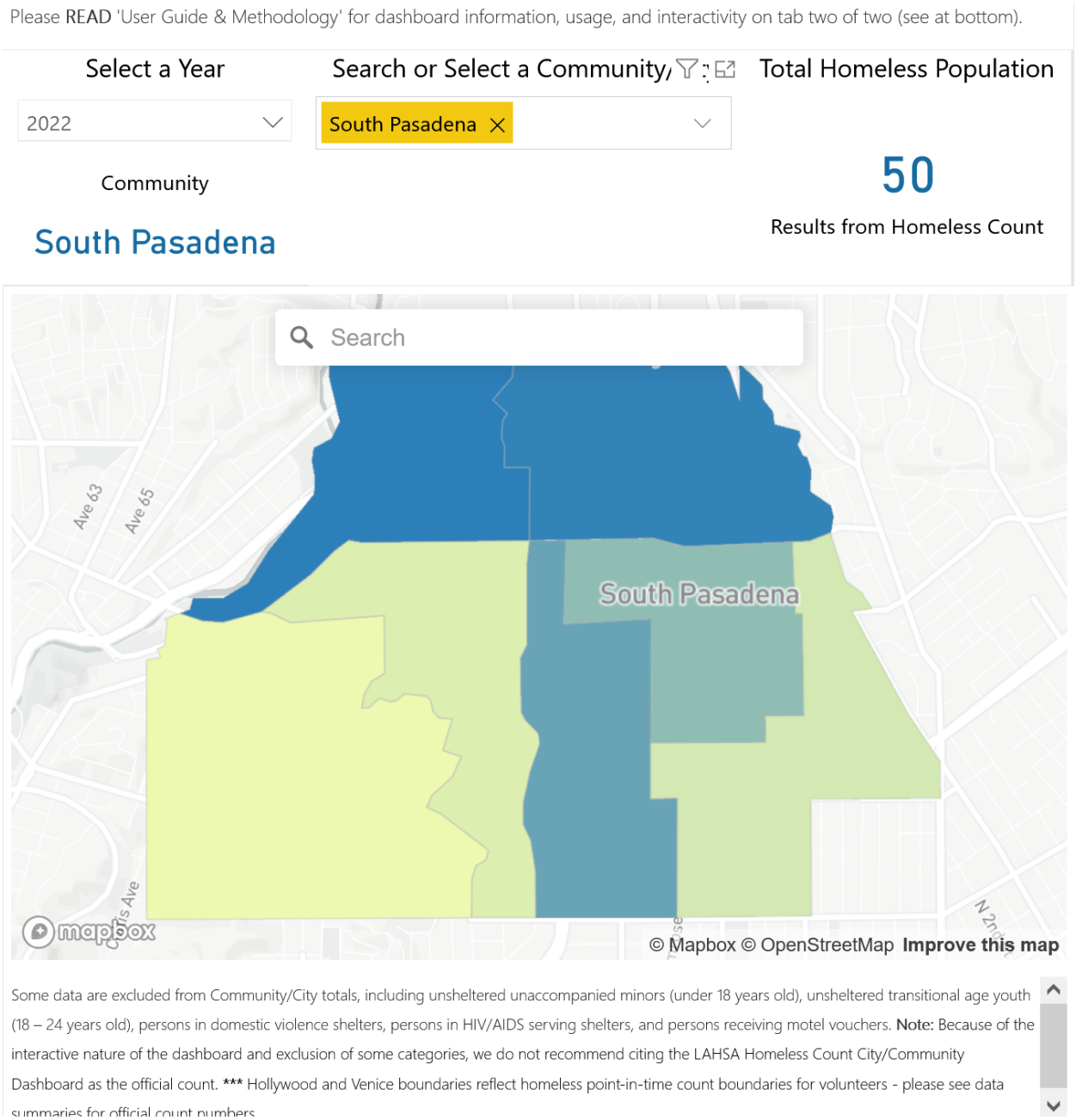
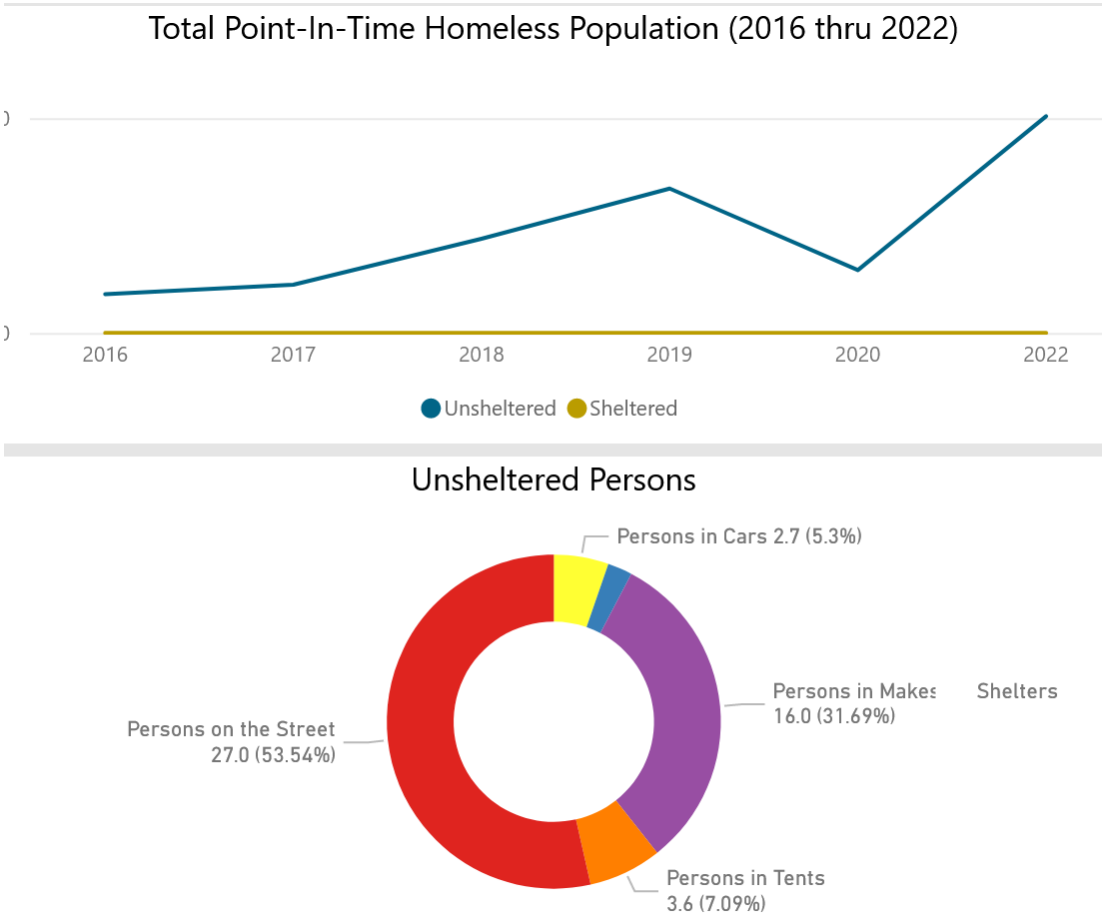


Figure VI-2 (continued)
2022 LAHSA HOMELESS COUNT RESULTS: SOUTH PASADENA



There are no homeless shelters operating within the City of South Pasadena. Typically, unhoused individuals in South Pasadena find shelter in Arroyo Park, under the Oaklawn Bridge, and at other locations in the City. While there are no shelters within the City limits, the following shelters are located in the adjacent City of Los Angeles:

- SRO Housing Corporation
- Testimonial Community Love Center
- United States Veterans Initiative, Inc.
- Volunteers of America of Los Angeles
- Weingart Center Association
- Los Angeles Mission
- Midnight Mission
- People Assisting the Homeless
- Union Rescue Mission

Within the adjacent City of Pasadena, the following shelters and hotlines offer assistance to the homeless:

- All Saints Pasadena Church
- Friendship Indeed
- Union Station Homeless Services
- Door of Hope
- Haven House
- Emergency Shelter Line (211)
- LAHOP.ORG referral service, affiliated with Union Station

The Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments. This led to many unsheltered persons making contact with service providers and finding additional appropriate resources. Part of the housing navigator service works with the City's Police Department through an informal referral services program with Union Station Homeless Services, a homeless shelter and service provider located in the City of Pasadena. The service provides transportation to the shelter and referrals of homeless individuals to the Union Station service programs. Additionally, the City's Police Department conducts regular outreach to unhoused individuals who are present in the City during different daytime and evening hours and maintains family contact notification information for those that request this service. This outreach is coordinated with agencies in nearby cities to streamline resources and serve unhoused clients in the best and most efficient way.

In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities, and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provided one-time rental assistance to eligible low-income residents during the pandemic state of emergency in 2020-2021. A public education video funded by the SGV COG about how to help the unhoused is in preparation and other initiatives will continue through 2022.

The City Zoning Code permits homeless shelters and single-room occupancy housing in the BP zone by right and transitional and supportive housing by right in all residential zones. (South Pasadena City Code sections 36.230.030, Table 2-3; 36.250.250; and 36.250.260). Programs 4.a and 4.b are proposed to address compliance with current state law requirements regarding emergency shelters and transitional and supportive housing.

6.3.7 Housing Profile

A housing unit is defined as a house, apartment, or single room, occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters. Separate living quarters refer to those units in which the occupants live and eat separately from any other person in the building and that have direct access from the outside of the building or through a common hall. A community's housing stock is the compilation of all its housing units.

Number of Housing Units

As described in Table VI-22, there were 10,678 housing units in the City per the 2015-2019 ACS or 11,118 housing units according the California Department of Finance (DOF)'s E-5 projections for 2019.[1] Of this total reported by the ACS, approximately 48 percent were renter-occupied, approximately 44 percent were owner-occupied, and approximately 8 percent (851 units) were vacant, an absolute increase in the city's vacancy rate of 2 percentage points (from 6 to 8 percent) over the last eight years, compared to data provided in the 2014-2021 Housing Element. Approximately 4 percent of the city's housing units were vacant rentals and 1 percent were vacant homeowner units. An approximate 1% (5 units) of vacant units were identified as being used for seasonal, recreational or occasional use. South Pasadena's 2019 vacancy rate reported by the ACS was only slightly higher than the vacancy rate for Los Angeles County at 6.4 percent. According to DOF, the County's vacancy rate for 2019 was 6.1 percent, a marginal increase from the 5.9 percent reported for 2010. Of the County's entire housing unit stock of 3,542,800 counted in the 2015-2019 ACS, an approximate 2.3 percent were vacant rental units and an approximate 1.7 percent were vacant homeowner units. South Pasadena thus has a higher overall vacancy rate compared to the County, has experienced a larger increase in vacancy from 2010, and has higher vacancy rates among both rental and owner-occupied housing types.

[1] Because the ACS is a federal survey and relies upon limited sampling over a 5-year period the numbers reported differ from those reported by the California Department of Finance which incorporates data submitted by other state agencies as well as by local jurisdictions to develop the final count of housing units. For more information on the methodology of the E-5 estimate data please refer to the California Department of Finance: https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/

Table VI-22
HOUSING UNITS BY OCCUPANCY STATUS

HOUSING UNITS BY OCCUPANCY STATUS	HOUSING UNITS	PERCENTAGE
Occupied Housing Units:	9,827	92%
Owner-Occupied	4,659	44%
Renter-Occupied	5,168	48%
VACANT HOUSING UNIT SUBCATEGORIES	**HOUSING UNITS**	**PERCENTAGE**
Vacant Housing Units	851	8%
For rent	284	3%
Rented, not occupied	100	1%
For sale only	111	1%
Sold, not occupied	41	<1%
For seasonal, recreational, or occasional use	55	1%
All other vacant	260	2%
Vacancy Rate	8%	--
Vacancy rate minus seasonal units	7%	--
Homeowner vacancy rate	1%	--
Rental vacancy rate	4%	--
Total	**10,678**	**100%**

Source: 2015-2019 ACS: B25002 Occupancy Status. 2015-2019 ACS: B25003, Tenure. 2015-2019 ACS: B25004 Vacancy Status.

Housing Growth

According to California DOF data, the City's housing stock increased from 10,349 to 11,186 between 1980 and 2020 (Table VI-23). Between 2012 and 2020, approximately the period of the last housing element RHNA, 63 new residential dwelling units were constructed, representing a 0.5-percent growth increment over the eight-year period.

Table VI-23
HISTORIC HOUSING TRENDS: 1980-2019

YEAR	SINGLE-FAMILY		MULTIFAMILY		TOTAL UNITS
	UNITS	PERCENT	UNITS	PERCENT	
1980	6,520	63.0%	3,829	37.0%	10,349
1990	5,434	50.7%	5,285	49.3%	10,719
1994	5,456	50.6%	5,325	49.4%	10,780
2000	5,679	52.3%	5,181	47.7%	10,860
2012	5,605	50.4%	5,518	49.6%	11,123
2019	5,642	50.48%	5,534	49.52%	11,176
2020	5,652	50.53%	5,534	49.57%	11,186

Source: California DOF, 2019, 2020

South Pasadena has high standards for architecture and landscape preservation, and its residents take pride in its appearance. Much of the planning over the last few decades has utilized highly discretionary processes, which may have slowed residential development. Development may have also been hindered by the City's decades-long struggle to reverse the planned 710 Freeway extension, which was finally cancelled by Caltrans. Today, South Pasadena's leadership is taking a different approach to encouraging housing as reflected in the housing programs in this document. Although many discretionary processes are still in place, the City has already implemented quicker and more

ministerial permitting through the inclusionary housing ordinance to provide more flexibility for residential projects, particularly through incentives that are offered along with density bonuses for projects that provide affordable housing units. These incentives include height increases and waivers from setbacks, floor area ratios, parking, and other requirements for eligible residential projects.

The Zoning Code includes further provisions for approval of modifications to standard development standards, as further described in Section 6.6.1, Zoning Code Resources.

Although South Pasadena complied with its RHNA for market-rate units in the previous housing element cycle, housing production fell short of the RHNA target for new affordable housing units. It is clear that policies over the last decade have not promoted housing development as required to meet housing needs and affordable housing units in particular. The policies of this housing element seek to change this trajectory.

Housing Type and Tenure

Table VI-24 describes occupancy status of units according to the number of units in the structure. Approximately 53 percent of all housing units are single-family homes.

Table VI-24
HOUSING UNITS BY TYPE AND OCCUPANCY STATUS

UNITS BY TYPE	SOUTH PASADENA	
	UNITS	PERCENT
Single-Family Detached	4,980	45%
Single-Family Attached	662	6%
2 to 4 Units	1,404	13%
5 or More Units	4,130	37%
Mobile Homes	0	0%
Total (Occupied)	10,567	95%
Grand Total (Occupied and Unoccupied Housing Units)	**11,176**	**100%**

Source: California DOF, 2019

Age and Condition of Housing Stock

Compared to more recently planned and developed cities in the state, South Pasadena has a disproportionately older housing stock, due to its proximity to central Los Angeles and early availability of public transportation. It was incorporated in 1888, among the first cities to do so in Los Angeles County. This can have implications on the overall condition of the housing stock regarding maintenance and repair needs. Policies beginning fifty years ago placed a value on historic preservation of those early built single-family homes, also contributing to the continued presence of many of these older structures, which were not required to be built to the standards required by more recent building codes for energy efficiency and seismic safety.

Additionally, there are 68 surplus residential properties that Caltrans took by eminent domain to build the 710 freeway, a project that has now been abandoned. The homes, which have been rented out during this period, have not been maintained adequately, and some are currently vacant and boarded up. The rehabilitation or replacement of these structures is addressed in Program 1.b – Housing Acquisition.

As illustrated in Table VI-25, approximately 45.9 percent of the city's occupied housing units were built prior to 1949. Since the last housing element, 315 housing units from this era (about 6 percent) have been demolished. Today, nearly 94 percent of the occupied housing stock is over 30 years old, indicating likely rehabilitation needs.

Table VI-25
OCCUPIED HOUSING UNITS BY AGE OF HOUSING STOCK – AS OF 2018

YEAR STRUCTURE BUILT	TOTAL OCCUPIED UNITS		OWNER-OCCUPIED	RENTER-OCCUPIED
	NO.	%		
2010 or later	42	0.4%	28	14
2000 to 2009	211	2.1%	178	33
1990 to 1999	365	3.6%	126	239
1980 to 1989	541	5.4%	250	291
1970 to 1979	1,128	11.3%	448	680
1960 to 1969	1,658	16.6%	508	1150
1950 to 1959	1,469	14.7%	678	791
1940 to 1949	915	9.1%	311	604
1939 or earlier	3,678	36.8%	2,143	1,535
Total	**10,007**	**100%**	**4,670**	**5,337**

Source: 2014-2018 ACS B25036: Tenure by Year Structure Built

In order to determine the overall condition of the housing stock, the City's Community Improvement Coordinator conducted a windshield survey of all residential properties in the city, nearly 11,000 properties. The exterior condition of each home was noted, including the condition of the roof, chimney, and gutters; porches, stairs, and garage; doors and windows; exterior surfaces; and foundation.

The City of South Pasadena is proactive in encouraging landlords to maintain, rehabilitate and remodel their units. The windshield survey did not identify any multi-family buildings in need of rehabilitation at the Moderate, Substantial or Dilapidated levels.

While the vast majority of the housing surveyed (nearly 98 percent) was found to be in above-average to excellent condition, 232 units (2.07 percent) were found to need some form of rehabilitation (see Table VI-26, below). 186 of these units needed repainting and are classified as minor. Typical moderate or substantial structural defects observed included roofs in need of replacement (missing or peeling asphalt shingles, asphalt tiles and roll roofing worn down to fiberglass, etc.), sagging eaves and significant dry-rot, damaged siding, peeling paint, broken steps, and sagging and detached roof gutters. A number of the homes had outbuildings (such as detached garages or sheds) that were in poor condition or potentially structurally unsound. The majority of homes requiring maintenance or abatement are owned by longtime residents.

Eight of the 232 units were considered dilapidated and in need of replacement, of which five were occupied. Four of these homes were located on one street within the City's Southwest Monterey Hills community, where many of the houses identified as requiring some level of repair were located. The units were constructed during 1920-1930 on very steep hillside lots, with frame on slab foundations. Many of the foundations have cracked from shifting soils and erosion. While this neighborhood offers many attractive features, the geography results in unique challenges to redevelopment.

The City has authority to enforce Code violations on residential properties exhibiting characteristics of blight. In the past, enforcement has mostly proceeded based on receiving a complaint. Property owners are first informed to bring the property into compliance with city codes, with additional steps and citations issued if necessary to achieve compliance. Where homeowners are eligible, the City strives to identify programs and to assist lower-income and elderly homeowners to access them.

The City is moving toward having the capacity to proactively seek compliance for residential habitability. Program 1.c aims to address the condition of properties identified as being in need of repair, particularly the 46 properties identified below as moderate, substantial and dilapidated, as well as other properties identified over the coming years.

Table VI-26
HOUSING CONDITION SURVEY SUMMARY 2022

HOUSING TYPE	SOUND	MINOR	MODERATE	SUBSTANTIAL	DILAPIDATED	TOTAL
Single	5,425	171	30	8	8	5,642
Mobile	**0**	**0**	**0**	**0**	**0**	**0**
2 to 4 Units	1,389	15	0	0	0	1,404
5 or More Units	4,130	0	0	0	0	4,130
Total	**10,944**	**186**	**30**	**8**	**8**	**11,176**
Percent	97.92%	1.66%	0.26%	0.07%	0.07%	100.00 %

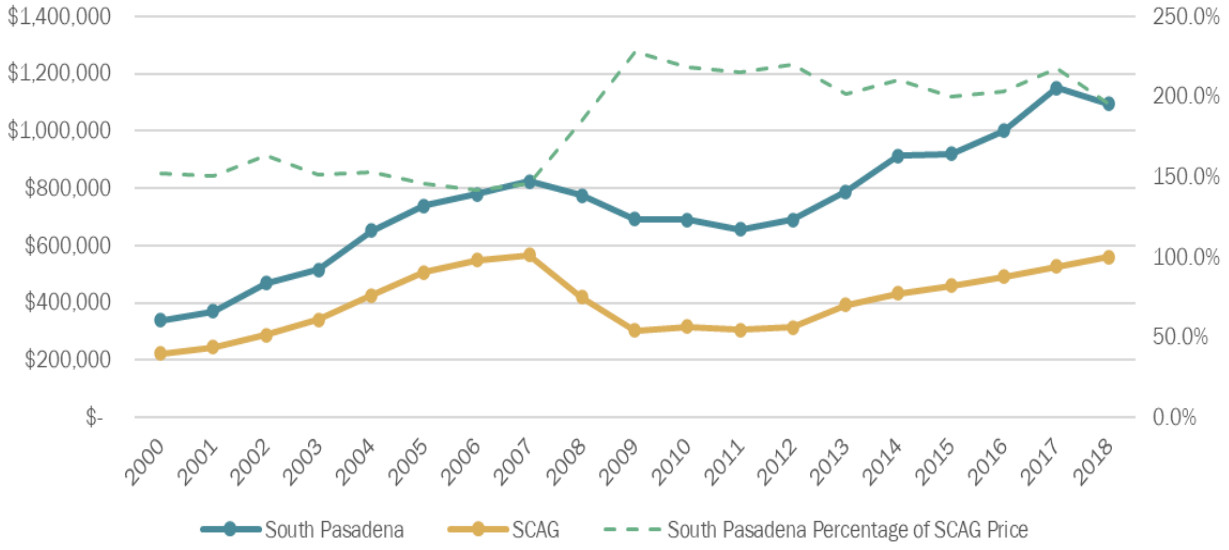
Source: City of South Pasadena Community Development Department, 2022

Home Prices

Income is a major factor influencing the demand for housing and to a large extent, reflects the affordability of housing in a community. Between 2000 and 2018, median home sale prices in South Pasadena increased 223 percent, while prices in the SCAG region increased 151 percent (see Figure VI-3). Prices in South Pasadena have ranged from a low of 142.1 percent of the SCAG region median in 2006 and a high of 228.1 percent of the SCAG region median in 2009.

National policies of historically low interest rates, combined with low supply, have led to ever-increasing home prices throughout the region, state, and most places in the country. This has been particularly acute in South Pasadena with home values continuing to rise in 2020-2021 throughout the pandemic. While the 2018 median home sales price in South Pasadena included in SCAG's Community Profile (prepared in 2020) was $1,095,000, a steep upward trend for housing prices has continued. In September 2021, as a point-in-time, the Zillow website estimated a median home value of more the $1.4 million, reflecting a 17.5% increase in the past year.

Figure VI-3
MEDIAN HOME SALES PRICE FOR EXISTING HOMES



Source: SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians, 2020.

Rental Rates

As a snapshot of rental rates for properties in South Pasadena, a search of Zillow.com listings was conducted in April 2020 and again in June 2021, in order to see whether the COVID-19 pandemic had measurably impacted housing affordability in one direction or the other. As seen in Table VI-27, there were some minor fluctuations, with a reduction in the lower end of one-bedroom apartments, from $1,675 to $1,400. However, there was little change in two-bedroom units and the lower end of three-bedroom unit rates had increased. The number of units advertised for rent was nearly the same. While the market was relatively stable during the pandemic throughout the emergency order period, it remains to be seen whether this situation will change with the removal of emergency orders, government subsidies and the eviction moratorium.

Table VI-27
RESIDENTIAL RENTAL PRICES

TYPE OF UNIT	NUMBER OF UNITS SURVEYED	2020 LOW	2020 HIGH	NUMBER OF UNITS SURVEYED	2021 LOW	2021 HIGH
1 Bedroom	15	$1,675	$2,500	13	$1,400	$2,600
2 Bedroom	9	$1,795	$3,100	12	$1,795	$3,450
3 Bedroom	5	$2,800	$5,950	3	$3,550	$5,200
Total Listed Units	**29**			**28**		

Source: Online survey of rental price listings on Zillow (accessed April 2, 2020 and June 2, 2021).

Housing Costs and Affordability

"Affordability" is a measure of whether monthly housing costs constitute a burden on households in relation to their incomes. Overpayment refers to spending more than 30 percent of a household's gross income for shelter. Overpaying for housing eventually causes fixed-income seniors and lower-income households to make choices that negatively affect their standard of living, and can trigger related financial problems resulting in deterioration of housing stock when maintenance is sacrificed for more immediate expenses, such as food, clothing, medical care, and utilities. By definition, housing is "affordable" if the monthly payment is not more than 30 percent of a household's gross income.

Tables VI-28 and VI-29 examine the costs of home ownership or renting compared to the HUD household income categories to get a picture of housing affordability in South Pasadena based on 2014-2018 CHAS data, the most recent data available that is broken down to support this type of analysis. The tables show the overpayment burdens by housing costs that are either 30 percent and above, moderate overpayment or 50 percent and above, severe overpayment (the moderate overpayment data includes people severely overpaying). The data show that more than 85 percent of extremely low, 94 percent of very low, and 59 percent of low income households that own their homes pay more than 30 percent of their incomes for housing and are therefore burdened by housing costs. Many may be fixed-income seniors, given the high percentage of seniors in the home ownership data. The rental burden is higher, with 77 percent of extremely low, 95 percent of very low and 77 percent of low-income households paying more than 30 percent of their incomes for housing.

Table VI-28
HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2018
OWNER-OCCUPIED HOUSING UNITS

INCOME GROUP	TOTAL	MORE THAN 30%		MORE THAN 50%	
EXTREMELY LOW-INCOME	265	225	85%	175	66%
Less than $33,800					
VERY LOW-INCOME:	250	235	94%	205	82%
Between $33,801 and $56,300					
LOW-INCOME:	365	215	59%	130	36%
Between $56,301 and $90,100					
MODERATE-INCOME:	335	130	39%	80	24%
Between $90,101 and $92,750					
ABOVE-MODERATE INCOME:	4,670	1,370	29%	680	15%
Above $92,750					

Source: 2014-2018 CHAS, 2020 HCD Income Limits

Table VI-29
HOUSING COST AS A PERCENTAGE OF HOUSEHOLD INCOME – 2016
RENTER-OCCUPIED HOUSING UNITS

INCOME GROUP	TOTAL	30% OR MORE		50% OR MORE	
EXTREMELY LOW-INCOME	760	584	77%	580	76%
Less than $33,800					
VERY LOW-INCOME:	435	415	95%	255	59%
Between $33,801 and $56,300					
LOW-INCOME:	755	585	77%	90	12%
Between $56,301 and $90,100					
MODERATE-INCOME:	725	390	54%	45	6%
Between $90,101 and $92,750					
ABOVE-MODERATE INCOME:	2,665	100	4%	0	0%
Above $92,750					

Source: 2014-2018 CHAS, 2020 HCD Income Limits

Table VI-30 provides regional household incomes and maximum housing costs that are considered affordable for Extremely Low/Very Low /Lower/Moderate Income households applicable to Los Angeles County jurisdictions. A typical four-person extremely low-income household can afford no more than a maximum sales price of $83,666, a four-person very-low income household can afford no more than $184,513, a four-person low-income household can afford no more than $335,494, and a four-person moderate-income household can afford no more than $403,212 on a home for sale. Table VI-30 shows projected affordable housing costs for extremely low-income, very low-income, low-income, and moderate-income households in South Pasadena by household size.

Table VI-30
AFFORDABLE HOUSING INCOME LIMITS AND COST PROJECTIONS

EXTREMELY LOW- INCOME	1 PERSON	2 PERSON	3 PERSON	4 PERSON
Annual Income Limit	$23,700	$27,050	$30,450	$33,800
Monthly Income	$1,975	$2,254	$2,538	$2,817
Maximum Monthly Rent	$593	$676	$761	$845
Maximum Sales Price	$38,568	$53,562	$68,730	$83,666
VERY LOW-INCOME	**1 PERSON**	**2 PERSON**	**3 PERSON**	**4 PERSON**
Annual Income Limit	$39,450	$45,050	$50,700	$56,300
Monthly Income	$3,288	$3,754	$4,225	$4,692
Maximum Monthly Rent	$986	$1,126	$1,268	$1,408
Maximum Sales Price	$109,022	$134,321	$159,446	$184,513
LOWER-INCOME	**1 PERSON**	**2 PERSON**	**3 PERSON**	**4 PERSON**
Annual Income Limit	$63,100	$72,100	$81,100	$90,100
Monthly Income	$5,258	$6,008	$6,758	$7,508
Maximum Monthly Rent	$1,578	$1,803	$2,028	$2,253
Maximum Sales Price	$214,674	$254,967	$295,260	$335,494
MODERATE-INCOME	**1 PERSON**	**2 PERSON**	**3 PERSON**	**4 PERSON**
Annual Income Limit	$64,900	$74,200	$83,500	$92,750
Monthly Income	$5,408	$6,183	$6,958	$7,729
Maximum Monthly Rent	$1,623	$1,855	$2,088	$2,319
Maximum Sales Price	$259,451	$307,284	$355,379	$403,212

Source: 2020 HCD Income Limits
Notes: Calculated using Chase Bank Mortgage Calculator (https://www.chase.com/personal/mortgage/calculators-

resources/affordability-calculator). Assumes monthly expenses total $500, a down payment of 10% (or 20% for moderate income households), a 4.5% interest rate, property taxes/fees of 2%, and property insurance of 1%.

Assisted Housing at Risk of Conversion

The Housing Element must identify, analyze, and propose programs to preserve housing units that are currently restricted for low-income housing and that could become unrestricted and possibly lost as low-income housing. In South Pasadena, there are no federally-assisted housing units currently restricted to low-income housing use, and therefore there are no federally-assisted units at risk of conversion from affordable rental units to market rate rental units.

There are a few smaller projects with deed-restricted affordable units, however, including one entitled in 2020. As new projects are developed in compliance with the recently-adopted Inclusionary Housing Ordinance requirements, and when affordable projects built by non-profit housing corporations build based on new incentives, the City will update and maintain a list of all dwellings in the City that are subsidized by government funding or low-income housing developed through local regulations or incentives and their covenant expiration dates (Program 1.d), in compliance with state law. The City will contact all property owners and notify them of the legal requirements to provide notice prior to the conversion of any units for lower-income households to market-rate units, although this will not be within the planning period of this housing element.

6.3.8 Summary of Housing Needs

To conclude this section, Table VI-31 and the paragraphs that follow summarize and highlight the areas of greatest need for housing assistance in South Pasadena.

Table VI-31
SUMMARY OF EXISTING AND PROJECTED HOUSING NEEDS

OVERPAYING HOUSEHOLDS		SPECIAL-NEEDS GROUP*	
	Total	**Senior Households**	**2,218**
Renter	2,074	Disabled Persons	1,859
Owner	1,370	Single-Parent Households with Children	766
		Large Households	561
		Homeless Persons	34
OVERCROWDED HOUSEHOLDS		**REGIONAL HOUSING ASSESSMENT 2021-2029**	
	Total	**Total Construction Need**	**2,067**
Renter	213	Very Low Income	757
Owner	42	Low Income	398
		Moderate Income	334
		Upper Income	578

Sources: US Department of Housing and Urban Development CHAS Data Sets 2014-2018; SCAG RHNA March 2021; 2014-2018 ACS B25014 Tenure by Occupants per Room
*References data from Table VI-15.

Note: Special-needs figures cannot be totaled because categories are not exclusive of one another.

Households Overpaying for Housing – Approximately 36 percent of all households in South Pasadena spend 30 percent or more of their income on housing. Of these overpaying households, 36 percent were owners. Renter-households have the highest incidence of overpayment, with 64 percent spending more than 30 percent of their household income for housing. Of these, 86 percent

of renters earning 80 percent or less of the County median income are paying more than 30 percent of their incomes for housing costs. More than 72 percent of low-income households who own their homes overpay for housing.

Special-Needs Households – The Housing Needs Assessment documents the following groups with special housing needs:

- 2,218 households (22 percent) headed by seniors;
- 1,859 persons (7.2 percent) aged 16 and over with physical disabilities;
- 766 single-parent households (4.8 percent) with children;
- 561 large households consisting of five members or more
- 15 unhoused persons in the City, constituting less than 1 percent of the City's population.

The percentage of seniors has increased from 12 percent in 2012 as reported in the 2013-2021 Housing Element to the 22 percent detailed above. The needs of this group are therefore more prominent than at the time the last Housing Element was adopted.

Age and Condition of Housing Stock – Approximately 97 percent of the City's housing units are 30 years of age or older, when most housing units typically begin to require major repairs. In general, most of the City's housing stock does not show signs of deferred maintenance. However, housing habitability is investigated by the City when reported, including older apartment buildings. Single-family homes owned by seniors, who often live on a fixed income, represent a subset of the population that there may be need for financial support for repairs.

Housing Affordability for Low to Moderate Income Households – Affordability projections (Table IV-30) indicate that home ownership is not feasible for households that fall into the categories of extremely low-income, very-low income, or lower-income. Moderate income households may be able to pay just over $400,000, a price that would require subsidy through the inclusionary housing requirement or an affordable housing developer. Rental prices in South Pasadena are similarly not feasible for lower income households, although the lower end of available rentals is within reach for moderate income households. This analysis is consistent with the high level of overpayment shown by the data for lower income households.

Overcrowded Households – Household overcrowding in South Pasadena is relatively nominal, with less than 2 percent of the City's households having greater than 1.5 persons per room.

Fair Housing – The history of discrimination in South Pasadena has led to some of the patterns of today in the City. Affording housing in the City is expensive for most and the incomes of those who live in South Pasadena are on average high compared to the regional average. In general, those who already live in South Pasadena have good access to resources and opportunities including schools, transportation, and environmental amenities. Issues analyzed in the Fair Housing Assessment that are impacting current South Pasadena residents are overpayment and some discrimination towards those with disabilities.

6.4 FAIR HOUSING ASSESSMENT

Assembly Bill (AB) 686 requires that all Housing Elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under California law, AFFH means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

In compliance with AB 686 and AB 1304, the following analysis is provided to complete three major requirements:

1. Include an AFFH program that promotes housing opportunities throughout the community for protected classes.

2. Conduct an AFH, which includes a summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify and address patterns of segregation or other barriers to fair housing, and prioritization of contributing factors to fair housing issues.

3. Prepare the Housing Element Sites Inventory to identify sites through the lens of AFFH.

To comply with AB 686, the City has completed the following outreach and analysis.

6.4.1 Outreach

As discussed in Section 6.2.4, Public Participation, multiple workshops, surveys, and hearings were conducted in conjunction with the preparation of this Housing Element. Translation was offered to participants; however, no translation requests were received for meetings for the Housing Element Update. Two rounds of workshops were held in spring and fall of 2020 and 14 public hearings took place between July 2020 and November 2022. A workshop and three public hearings were held in Fall 2021 after release of the public draft Housing Element. Members of the public, organizations providing community service in the City, and affordable housing developers were invited to participate in all outreach events. Public participants at the workshops included housing advocates, community members, those who work in South Pasadena, and renters and homeowners. In addition to these meetings, two surveys were conducted, one of which ran from May to September of 2020, and the second from September through October of 2020. Letters were received from members of the public, including some that described issues related to housing discrimination, urging the City to acknowledge and address the history and a legacy of fostering a community that lacks diversity. In response to these letters, the City has included Section 6.4.6 in this Assessment of Fair Housing, discussing South Pasadena's history.

During the months of January through March 2022, staff researched affordable housing developers and homeless service providers and added them to the list of interested stakeholders. Additionally, staff had meetings with the San Gabriel Valley Habitat for Humanity Executive Director and the Director of Real Estate Development to explore opportunities for potential future partnerships. Staff also met with the Los Angeles County Development Authority to explore use of Permanent Local Housing Allocation funds to benefit South Pasadena residents in need of affordable housing. Finally,

staff held several meetings with local developers, including a church, to discuss affordable housing development.

The City Council adopted the 5th draft of the Housing Element on May 30, 2023 and began to implement the required re-zoning programs. The 2023 adopted Housing Element presumed that some level of increased building height in excess of the City's current height limit would be needed to achieve the minimum densities allowed in our new plans and zoning ordinances. As a result, in 2024 and 2025 the City undertook the Measure SP ballot measure and Measure SP implementation to determine and adopt higher height limits in targeted areas as part of the Housing Element.

Additional details about all public outreach efforts can be found in Appendix B of this Housing Element.

Workshops

Due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in response to the COVID-19 pandemic, public workshops prior to and during the initial drafting of the Housing Element were held online to provide a way for residents to engage with the Housing Element Update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation.

The City held five public workshops during the initial draft Housing Element update process: two in Spring 2020, two in Fall 2020, and one in Fall 2021. The Spring 2020 workshops were held online on Saturday, May 30, 2020, at 10 a.m. and Tuesday, June 2, 2020, at 6 p.m. Each workshop had about 30 participants. During each workshop, the City began by providing an overview of the 6th-cycle Housing Element Update process and facilitating a question-and-answer session. Following this, the City discussed the requirements for analyzing sites and other approaches suitable to accommodate the City's RHNA. No comments or questions related to fair housing were raised during these workshops.

A second round of two online public workshops were held on Wednesday, September 23, 2020, at 6 p.m. and Saturday, September 26, 2020, at 10 a.m., with a short survey and ability for participants to send in email commentary. The workshops repeated a brief overview of the 6th Cycle Housing Element Update process, followed by a discussion of strategies under consideration to address the City's RHNA. Following the presentation, the 12 participants at the September 23rd workshop and the 15 participants at the September 26th workshop, were separated into virtual breakout rooms to discuss questions about RHNA strategies. Fair housing feedback included:

- Provide housing for everyone citywide and ensure that pockets of poverty are not sustained or created;
- Facilitate design flexibility for low-income housing;
- Promote different types of housing for families;
- Consider the benefits of siting housing in proximity to public transit, High Quality Transit Area, along the Huntington Drive/Fair Oaks/ Mission District/L-Line (formerly the Gold

Line) Station corridors, Downtown, and the Vons Center, such as walkability and proximity to amenities and resources;

- Identify housing sites that are dispersed throughout the City and not concentrated in certain areas; include single family neighborhoods and lower density multi-family;
- Initiate more proactive code enforcement;
- Address the limited rental housing availability and affordability issues;
- Address the demand for more permanent supportive housing as well as housing designed for specific populations.
- Implement more tenant protections; and
- Recognize and condemn previous race-based exclusionary practices of redlining and other racist practices that were prevalent in South Pasadena.

The fifth workshop was held on the evening of Thursday, October 21, 2021 and offered attendees both in-person and virtual options to participate. Approximately 10 people joined via Zoom, and 2 attended in-person. Following a presentation providing an overview of the Public Review Draft of the 2021-2029 Housing Element, participants asked for confirmation that Junior Accessory Dwelling Units (JADUs) would count toward the City's RHNA and emphasized the importance of planning for infrastructure capacity, including schools, water, wastewater, etc., to support housing development.

A sixth workshop was held on August 15, 2022 with developers that are active in South Pasadena. This Developer Workshop including eight community members, including two Planning Commissioners. The City provided a brief presentation that included a status update of the draft Housing Element and the draft General Plan and asked for input on several topics related to development in the City and received the following responses.

A seventh workshop was held on August 18, 2022 at the South Pasadena Farmers' Market. The Community Development Department set up a booth in the South Pasadena Farmers' Market from 4:00 to 8:00 pm to discuss the Housing Element. The late afternoon/evening market attracts hundreds of residents and many local employees and is a casual atmosphere for sharing ideas. Over the four-hour duration of the Market, Community Development staff discussed various aspects of the housing element with visitors to the booth, including: the sites inventory; ADUs; the regional housing crisis; the need for rezoning and mixed-use development and where it would be located; and reconsideration of the voter-approved height maximum through a new ballot initiative within the next two years. Those who stopped by expressed appreciation for the opportunity to talk to City staff about the issues.

An eighth workshop was held on Saturday, August 20, 2022 at City Hall and virtually. The purpose of the forum was to provide a brief overview of the Housing Element process; provide an update to the community on the status of addressing HCD's comments to the second draft of the Housing Element; and to solicit feedback from the community on the draft document and proposed programs. After a brief overview of the housing element process, the presentation focused on the bigger issues that needed to be addressed in the Housing Element, including the site analysis, development constraints including the height limitations, and Affirmatively Furthering Fair Housing.

A ninth workshop was held on November 9, 2022 in conjunction with the City's First Annual Social Services and Social Justice Forum. City staff and the City's Housing Element consultant were on hand to discuss the Housing Element with members of the public and service agencies present for the Social Justice Forum.

(Discussion of additional outreach for 2025 amendment can be found above in Section 6.2.4.).

Community Surveys

A short online survey about Housing Elements was available before, during, and after each workshop to solicit feedback from participants and included an option for respondents to submit comments and questions via email.

The first survey was made available on the City's website in May 2020 and was open until September 2020 and also sent to all registered attendees of the Spring 2020 Workshops. The main purpose of the survey was to gauge participants' experience with Housing Elements and the General Plan and to ascertain their perspective on housing issues. A total of 33 responses were received. Of these 60 percent of respondents were renters, 35 percent homeowners, and 3 percent other. The survey asked respondents to rank four issues facing the City in order of importance. The options most relevant to fair housing issues in order of priority, identified by respondents, were: (1) providing a diverse cost range of housing opportunities, (2) creation of economically sustainable neighborhoods, (3) preservation of existing housing stock, and (4) production of additional housing stock (mobility). However, it should be noted that most respondents chose all four options as priorities. Approximately 55 percent of respondents identified that they have been impacted by housing affordability.

The second survey was made available on the City's website in September 2020 until October 2020, with links sent to participants registered for the Fall 2020 Workshops. The main purpose of the survey was to identify the housing strategies primarily associated with sites analysis and land use controls slated for discussion at the Fall 2020 Workshops and to yield preliminary insight into the public's opinion of these topics in preparation for the workshops. A total of 17 responses were received. When asked to identify their support for strategies to meet the RHNA, 53 percent of respondents supported increased density in specific areas, 47 percent supported upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development, and 35 percent supported an aggressive program to incentivize development affordable ADUs. These strategies would help to expand available areas for housing to meet the lower-income RHNA. Individual respondents also emphasized a need to support and facilitate higher density and affordable development, citing the lack of affordable units approved recently and expressing concern that development adjacent to transit is financially unattainable for populations most dependent on public transportation for access to employment.

Specific responses to all questions included in the survey are included in Appendix B: Public Participation Summary.

Public Hearings

The City also presented on or discussed the Housing Element at 14 public hearings. At each of these meetings, the public was invited to attend and share comments on the Housing Element update and process.

July 21, 2020 - Planning Commission: Presented the City's RHNA allocation and options for addressing sites inventory needs and other policy options. No comments specific to fair housing issues were received.

August 5, 2020 - City Council: Considered a ballot measure to propose allowing increased height. No fair housing issues were discussed at this meeting.

August 11, 2020 - Planning Commission: Presented new analysis and specific sites to be included in the Housing Element sites inventory. Commissioners discussed the importance of integrating supporting resources to make neighborhoods more walkable and self-sustaining neighborhood, including transit access.

September 8, 2020 - Planning Commission: Presented on updates the City's ADU zoning regulations and associated programs in the draft Housing Element.

December 15, 2020 - Planning Commission: Presented design and economic analysis for specific sites to assess feasibility of different housing types and density.

January 26, 2021 - Planning Commission: Considered the proposed Inclusionary Housing Regulations.

May 26, 2021 – Planning Commission: Presented an update on Housing Element project.

October 12, 2021 – Planning Commission: Presented the Public Draft Housing Element.

November 9, 2021 – Planning Commission: Presented the Public Draft Housing Element

November 17, 2021 – City Council: Presented the Public Draft Housing Element

May 10, 2022 – Planning Commission: Presented 2nd Public Review Draft and discussed the revisions made to the new draft (in person/virtual hybrid format).

July 20, 2022 – City Council: Information Item on the HCD review letter for the 2nd Public Review Draft.

July 26, 2022 – Planning Commission discussion of 2nd Draft Housing Element HCD review letter.

November 9, 2022 – Joint City Council and Planning Commission: Provided an overview of the California Department of Housing and Community Development's response letter regarding the Third Draft Housing Element, discussed anticipated responses to address the comments in the letter, and received feedback from the community, Planning Commission, and City Council on the comments and proposed responses.

February 1, 2023 – City Council: Provided a summary of HCD's review letter regarding the 4th Draft Housing Element. Presented options for addressing remaining comments, including missing middle housing, identification of additional city-owned sites for lower income homes, increased zoning capacity along arterial corridors, and tenant protections.

February 9, 2023 – City Council: This meeting was intended to be a community meeting focused on the Housing Element, but a majority of the City Council wanted to attended so was noticed as a City Council meeting. Meeting was conducted as a workshop to further discuss revisions to the Housing Element and collect resident feedback.

February 15, 2023 – Joint City Council and Planning Commission: Presented refined ideas for addressing remaining comments based on feedback received from the Council and community over the preceding two meetings. Received direction from City Council and Planning Commission on how to revise the Housing Element.

Outreach Summary

Throughout the Housing Element update process, feedback was received from members of the public, stakeholders, elected officials, and others. With respect to barriers to access affordable housing, attendees at the four workshops identified that a need to increase the supply of affordable housing, while at the same time emphasizing the desire to maintain the historic small-town character and single family nature of South Pasadena. Respondents to surveys, phone call messages, and attendees at meetings focused primarily on the RHNA process, potential sites, strategies for meeting the RHNA, and ADUs. While some workshop attendees noted the needs of sensitive populations, issues faced by lower-income residents, and potential for displacement at a high level, they were not commented on or discussed further by attendees.

The majority of the discussion at the workshops and Planning Commission and City Council meetings focused on possible solutions to increase the stock of housing options, particularly higher density development, to provide a range of affordability. Modification of the City's zoning and development regulations was at the center of discussion, including: increasing height potential, increasing density thresholds throughout City; upzoning select single family residential neighborhoods, establishing strong design standards in conjunction with higher density project proposals, reducing parking requirements in select areas of the City, ADU guidelines, and providing fee reduction and other incentives for provision of ADUs, particularly units with rents affordable to lower income residents.

Participants in the outreach process also noted concern for the potential for creating an uneven distribution of lower-income housing based on currently available sites. Participants noted that the City's fabric currently is woven from a mix of densities within neighborhoods, and expressed that quality is part of what makes South Pasadena so attractive to residents. Overall, community members identified a need to disperse affordable housing in neighborhoods citywide to avoid concentrations of higher density, low-income neighborhoods or create pockets of poverty.

One major discussion topic revolved around transit accessibility, which is an important fair housing indicator. Participants supported the strategy for increasing housing opportunities along major

transportation corridors and in the vicinity of the L-Line (formerly the Gold Line) station. General concern about traffic impacts and parking associated with increased density, and impacts on the historic district, countered comments acknowledging that lower-income residents may have a greater dependence on public transit which should be taken into account for site identification.

Finally, participants felt strongly that the historic trends in South Pasadena of redlining and race-based exclusionary practices should be recognized officially by the Council and addressed in the Housing Element. Section 6.4.6 of the Assessment of Fair Housing describes the history of the development of South Pasadena, jurisdictional controls that have impacted the growth pattern, and other relevant practices that have influenced the availability and affordability of housing in the City, inclusive of redlining and similar restrictions to fair housing choice.

The comments received during the outreach process were incorporated into the programs in this Housing Element, including those identified in Table VI-32A to address fair housing issues.

6.4.2 Assessment of Fair Housing Issues (Affirmatively Furthering Fair Housing)

California Government Code Section 65583(c)(1)(C)(10)(A)(ii) requires the City of South Pasadena to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. According to the California Tax Credit Allocation Committee (TCAC)/HCD 2020 Opportunity Areas Map, the entirety of the City of South Pasadena is considered a "Highest Resource" area (Figure VI-4). Highest Resource areas are those with the highest index scores for a variety of educational, environmental, and economic indicators. Some of these indicators include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentrations of poverty, and low levels of environmental pollutants, among other factors. The universal designation of Highest Resource areas across the entirety of South Pasadena is likely a result of strong educational institutions and good environmental indicators in most, if not all, of the City, which have resulted in high property values.

To address prior trends that deterred location of persons with lower incomes from living in the City, the Housing Element includes Program 3.a, Program 3.b, Program 4.a, and Program 4.b to help provide additional housing, with an emphasis on affordable and supportive housing.

Unless otherwise noted, the following maps and analysis rely on data provided at the Census-tract level by various state and federal agencies, including the California Tax Credit Allocation Committee and Department of Housing and Community Development[2]; 2010 Census[3]; 2006-2010[4], 2010-2014[5], and 2015-2019[6] American Community Surveys; Esri's 2018 Updated Demographic estimates[7];

[2] California Tax Credit Allocation Committee and Housing and Community Development Department. *2020 TCAC/HCD Opportunity Map*, 2020. https://belonging.berkeley.edu/tcac-opportunity-map-2020
[3] U.S. Census Bureau. *2010 Decennial Census*. 2020. https://hudgis-hud.opendata.arcgis.com/
[4] U.S. Census Bureau. *2006-2010 American Community Survey*. 2010. https://hudgis-hud.opendata.arcgis.com/
[5] U.S. Census Bureau. *2010-2014 American Community Survey*. 2014. https://hudgis-hud.opendata.arcgis.com/
[6] U.S. Census Bureau. *2015-2019 American Community Survey*. 2019. https://hudgis-hud.opendata.arcgis.com/
[7] Esri. *Methodology Statement: 2018/2023 Esri US Updated Demographics*. July 2018. https://downloads.esri.com/esri_content_doc/dbl/us/J10268_Methodology_Statement_2018-2023_Esri_US_Demographic_Updates.pdf

California School Campus Database (CSCD)[8]; 2014 Longitudinal Employer-Household Dynamics (LEHD)[9]; and the California Health and Human Services Agency[10]. All data presented in the maps included in this assessment was collected through the AFFH Data Viewer mapping tool, a tool developed and approved by HCD for use in assessment of fair housing analyses as the most current and accurate data available[11]. The tract level was selected because geospatial and demographic data were most consistently available at this scale for South Pasadena, and the scale remained detailed enough to allow for neighborhood-level consideration of fair housing issues. This approach was developed in consultation with HCD and in conjunction with efforts to develop standardized state-wide datasets for fair housing analyses.

6.4.3 Patterns of Integration and Segregation

Since 2017, the California Tax Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources, including proximity to job opportunities; quality of schools; environmental health and safety; and other economic, social, and environmental indicators—in an effort to provide evidence for policy recommendations[12]. This effort has been dubbed "opportunity mapping," and it is available to all jurisdictions in California to evaluate access to opportunities within their communities. As previously stated, the City of South Pasadena has been categorized as "highest resource" by TCAC and HCD, compared to Los Angeles County (see Figure VI-4), meaning that South Pasadena has been identified as having strong educational opportunities, a balanced jobs-housing ratio, high property values, a high median income, and other positive conditions. In areas with lower resource designations than South Pasadena, these indicators of success do not present as strong of opportunities, which may include more limited access to jobs, lower home values, a shortage of outdoor recreational space, and more. The trends and factors that resulted in these patterns of access to resources and other fair housing issues may stem from historical patterns or current practices.

Areas of High Segregation and Poverty

Figure VI-4 also shows that South Pasadena does not include any federally designated Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)[13] or TCAC-designated Areas of High Segregation and Poverty. However, there are some TCAC Areas of High Segregation and Poverty located in relatively close proximity to South Pasadena, and numerous Areas of High Segregation and

[8] GreenInfo Network. *California School Campus Database*. 2021. http://www.mapcollaborator.org/mapcollab_cscd/?base=map&y=37.34396&x=-123.48633&z=6&layers=notes%2Cpolygons%2Cschoolboundaries%2Cschoolcentroids&opacs=100%2C25%2C100%2C100

[9] U.S. Census Bureau. *Longitudinal Employer-Household Dynamics*. 2014. https://lehd.ces.census.gov/

[10] California Health & Human Services Agency. *Percent of Household Overcrowding (> 1.0 persons per room) and Severe Overcrowding (> 1.5 persons per room)*. October 2020. https://data.chhs.ca.gov/dataset/housing-crowding

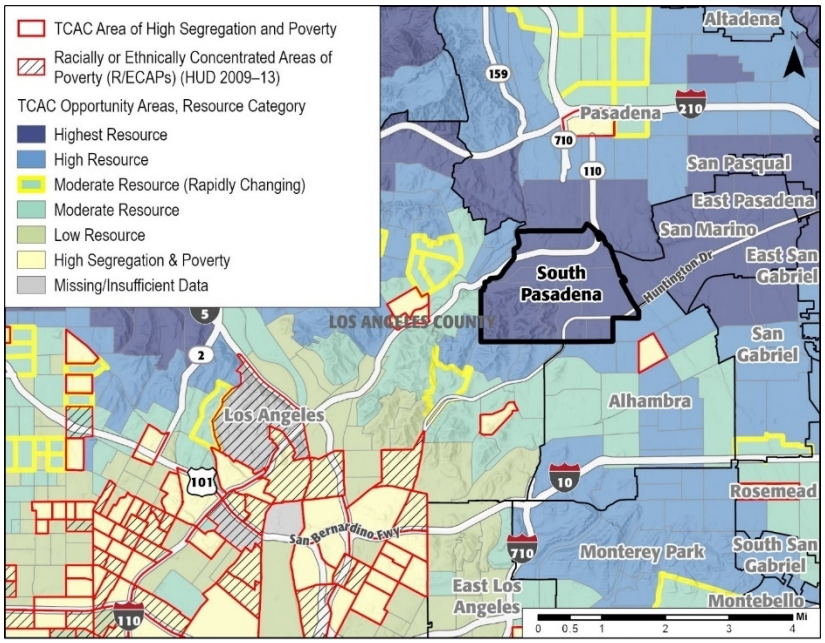
[11] California Department of Housing and Community Development. *Affirmatively Furthering Fair Housing Data and Mapping Resources*. 2021. https://affh-data-resources-cahcd.hub.arcgis.com/

[12] California Tax Credit Allocation Committee and Housing and Community Development Department. *California Housing Task Force: Methodology for the 2020 TCAC/HCD Opportunity Map*, June 2020. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf

[13] The U.S. Department of Housing and Urban Development (HUD) defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where: (1) the non-white population comprises 50 percent or more of the total population and (2) the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average poverty rate for the metropolitan area, whichever is lower.

Poverty as well as R/ECAPs located further to the south and west in the City of Los Angeles. As shown in Figures VI-5 through VI-7, the City of South Pasadena has relatively low rates of poverty, especially when compared to the surrounding region. Areas with higher rates of poverty surrounding South Pasadena include the City of Los Angeles to the south and west; Pasadena to the north; Glendale to the northwest; and Alhambra, San Gabriel, and Rosemead to the south and east. San Marino to the east has poverty rates that are roughly equivalent to or lower than South Pasadena.

Figure VI-4
TCAC/HCD OPPORTUNITY AREAS



Source: TCAC/HCD Opportunity Map, 2020[4]

In contrast to R/ECAPs, a racially concentrated area of affluence (RCAA) was defined in 2019 in the HUD's Cityscape periodical by Goetz et al. in *Racially Concentrated Areas of Affluence: A Preliminary Investigation* as a census tract in which 80 percent or more of the population is White and has a median income greater than $125,000 annually. Using this definition, there are no individual census tracts in, or overlapping with, the City of South Pasadena that can be identified as a RCAA. However, throughout South Pasadena, the median income is relatively high compared to many communities in the SCAG region, making the large portions of the city possible areas of affluence. There are three areas of the city in which the median income is less than the State median income, the neighborhood between Meridian Avenue and Fair Oaks Avenue ($80,996), the central area between Grevelia Street and Monterey Road ($74,107 to $85,962 depending on neighborhood), and a western neighborhood adjacent to Arroyo Seco Golf Course ($86,442). While the median income in these areas fall well below what would qualify as a concentration of affluence, most other neighborhoods have median incomes within reach, or greater than, the qualifying $125,000 annually. The neighborhood with the highest median income in South Pasadena is in the southwest corner, south of Monterey Road and west of Meridian Avenue. In this area, the median income ranges from $136,771 to $197,000. While the area is not predominantly White, it is still a concentration of affluence.

These patterns of high median income throughout the city run counter to many areas in Los Angeles County, particularly those south of South Pasadena. As shown in Figure VI-7, poverty rates increase

significantly immediately adjacent to South Pasadena in neighborhoods within the City of Los Angeles. In the SCAG region, most concentrations of affluence are located in coastal communities while inland suburban communities typically have a lower median income. South Pasadena does not follow this trend. Therefore, while not by definition an RCAA, the concentration of affluence may be a result of exclusion of lower-income households due to the available housing types, housing costs, or other factors. An analysis of historic policies that may have contributed to existing patterns of affluence is discussed further in Section 6.4.6 South Pasadena History. To ensure that there are housing opportunities for all current and prospective residents, regardless of income, the City will undertake the following programs as part of this Housing Element:

- **Program 1.b.** Purchase surplus properties and support affordable housing developers to create new and rehabilitated deed-restricted, affordable housing units, using any profit from the proceeds of historic properties to generate additional affordable housing.
- **Program 2.b.** Increase funding for affordable housing through the City's membership with the San Gabriel Valley Regional Housing Trust (SGVRHT).
- **Program 2.c.** Provide lower-income households with information on CalHome funding to help residents become or remain homeowners.
- **Program 2.g.** Expand the supply of housing for seniors to increase opportunities for households to access or remain in South Pasadena.
- **Program 2.h.** Work with developers to expand housing opportunities for lower-income households and special needs groups.
- **Program 2.i**. Monitor implementation of the inclusionary housing ordinance and revise if needed to effectively achieve construction of affordable housing units in projects throughout the city.
- ~~**Programs 2.j and 2.k.** Establish an Affordable Housing Overlay zone and land use designation to be applied to sites outside of the Downtown and Mixed-Use districts to provide housing mobility opportunities in high resource and affluent areas.~~
- **Programs 3.h and 3.k.** Encourage the construction of ADUs and monitor construction to track affordability
- **Program 4.d.** Revise the zoning code to require a minimum proportion of units in new construction be ADA accessible.

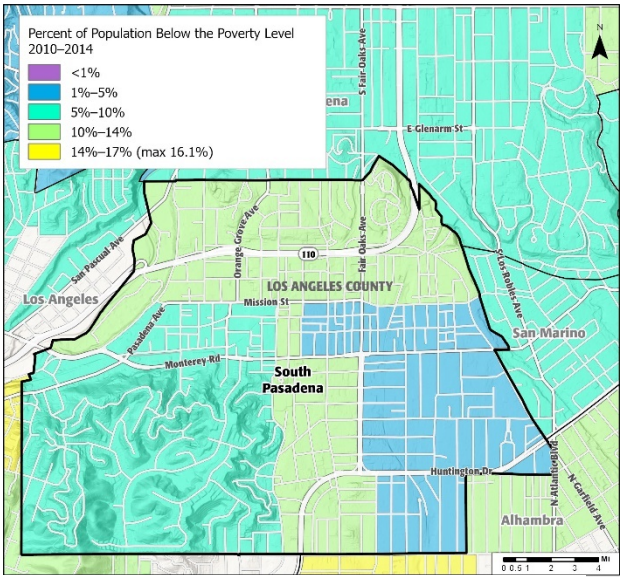
Poverty Rates

South Pasadena's poverty rate is relatively low for the Los Angeles region, and tends to be more similar to other nearby suburban communities to the north and east than to the nearby urban communities to the south and west (Figure VI-7).

The southern portions of South Pasadena feature the City's highest poverty rates, relatively speaking, with 10–14 percent of households in this area experiencing poverty. This area also it where some of the oldest, highest density apartment buildings are located. This compares to poverty rates of less than 5 percent in neighborhoods immediately to west with larger homes on larger lots and hillsides. Figures VI-5 and VI-6 show that these patterns have generally been stable over recent years with no dramatic changes evident in the geographic data available for the period from 2010–2014 to the current 2015–2019 dataset. Although some areas of the City saw increased poverty rates, other areas

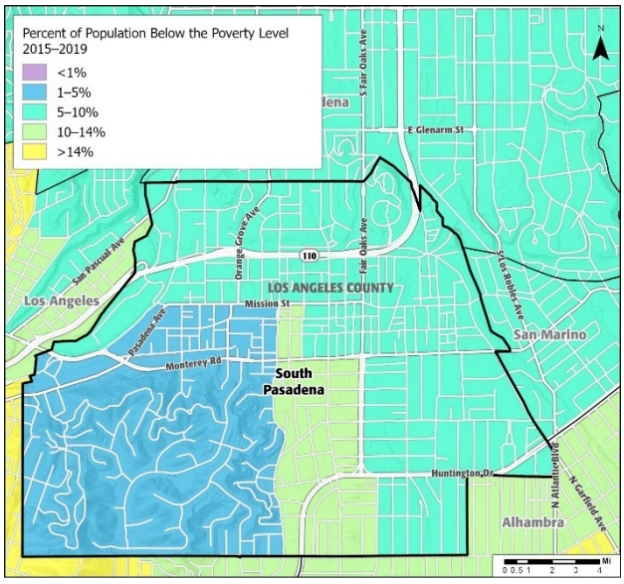
saw their poverty rates fall, and all changes were within the range of 1–10 percent. Additionally, it should be noted that there may be some areas of relatively higher poverty rates along the eastern and northern boundary of South Pasadena, including areas of multifamily homes in the vicinity of Raymond Hill. These patterns would be consistent with the concentration of potentially more affordable multifamily housing units and larger apartment complexes in the central and northeastern portions of the City, with less affordable single-family and larger-lot homes predominating in other areas.

Figure VI-5
LOCAL POVERTY RATES 2010–2014



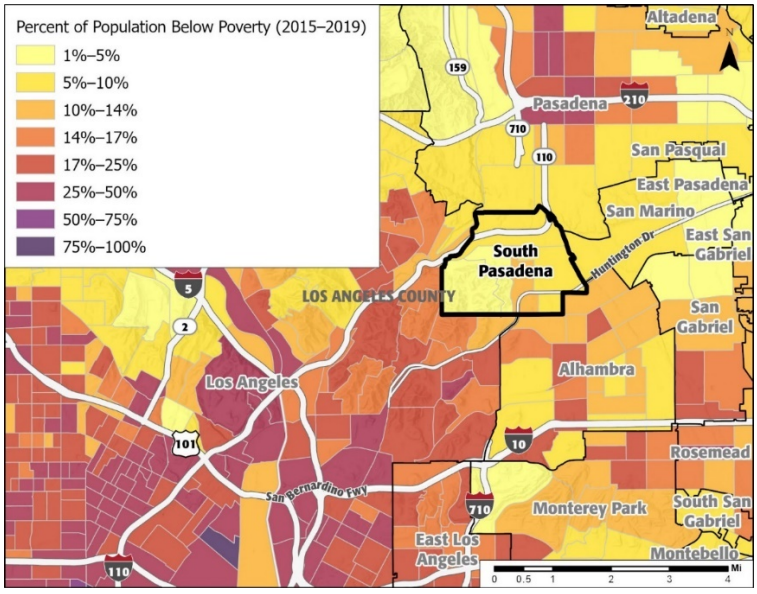
Source: U.S. Census Bureau, 2010-2014 American Community Survey[7]

Figure VI-6
LOCAL POVERTY RATES 2015–2019



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-7
REGIONAL POVERTY RATES 2015–2019

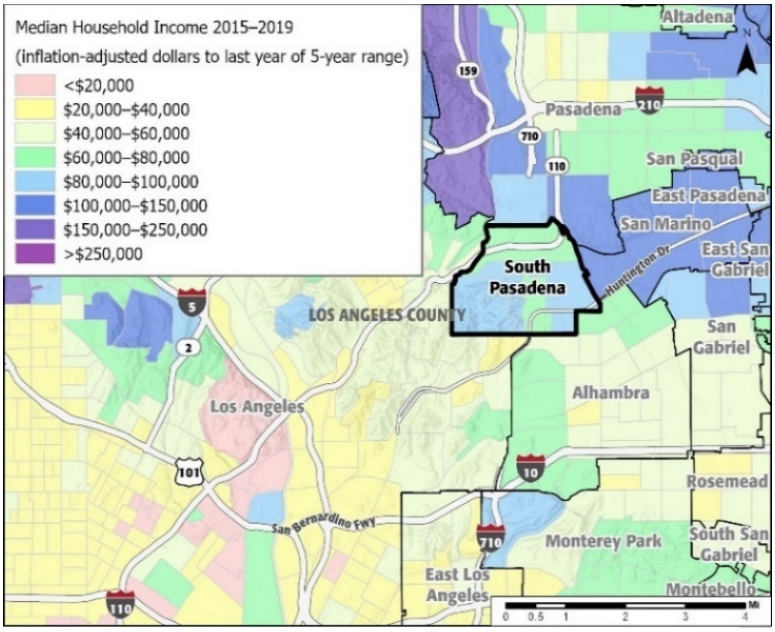


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

South Pasadena Household Income and Affordability as a Fair Housing Consideration

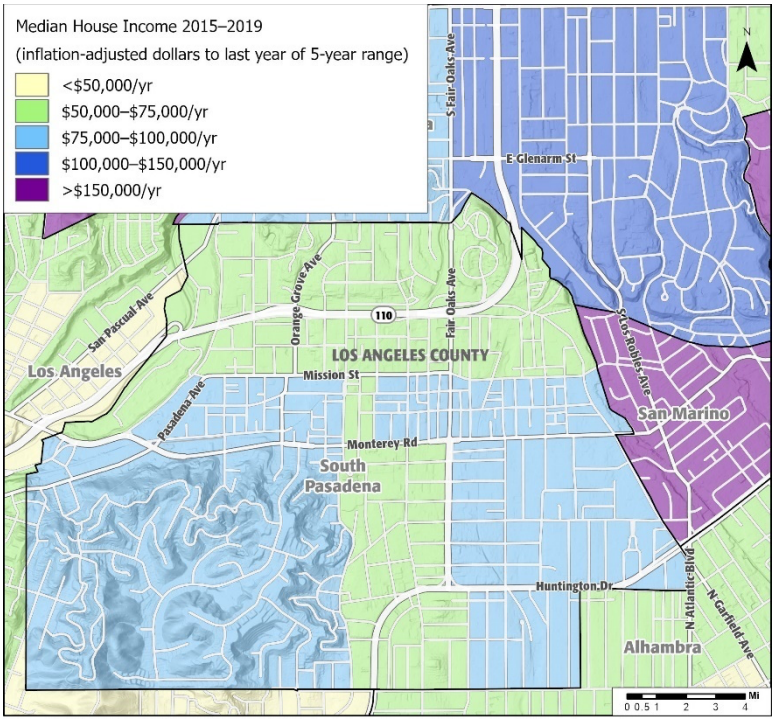
Figures VI-8 and VI-9 show that the City has relatively high median household incomes, with all South Pasadena census tracts featuring median household incomes in the ranges of $50,000–$75,000 or $75,000–$100,000 per year. As shown in Figure VI-8, although South Pasadena's median household incomes are lower than in San Marino, immediately to the east, they are considerably higher than in communities to the south and west, especially toward Downtown Los Angeles. As noted earlier, the median household income for the City in 2018 was $96,579, well above the County median of $64,251. Although South Pasadena experiences low rates of poverty and high household incomes relative to much of the surrounding region, this may be an indication that instead of effectively including opportunities that may lift people out of poverty through local policies, South Pasadena has remained generally unaffordable to those living in poverty, forcing lower-income households to live elsewhere. To address these potential fair-housing issues with respect to both poverty rates and exclusionary factors based on income level, the City in 2021 adopted its first inclusionary ordinance to address RHNA objectives and will implement Programs 3.a, 3.c, 4.a, and 4.b to meet its regional housing obligations, prevent residential demolitions, provide emergency shelter and transitional housing, and encourage a variety of housing types.

Figure VI-8
REGIONAL MEDIAN INCOME 2015–2019



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-9
LOCAL MEDIAN INCOME 2015–2019

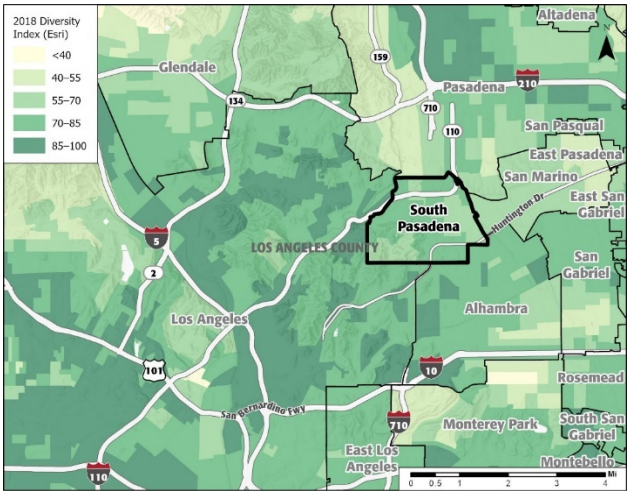


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Ethnic Diversity

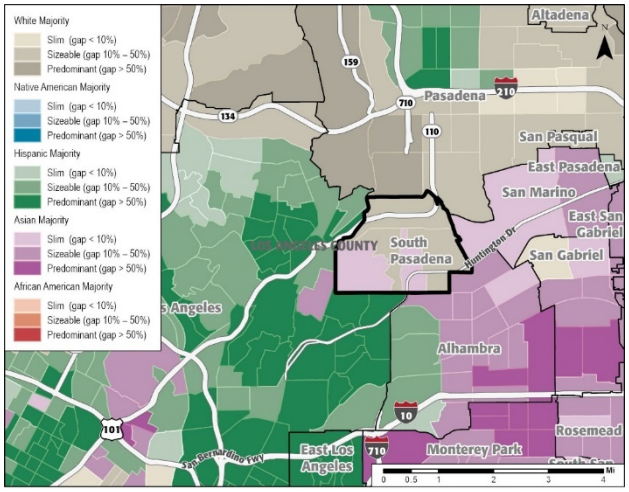
With respect to ethnic diversity, as shown in Figure VI-10, most areas of South Pasadena feature a moderate to moderately high diversity index. However, South Pasadena features lower diversity indices than areas to the south and west in the City of Los Angeles, as well as portions of communities to the north, such as Pasadena. Additionally, Figure VI-10 shows that in much of South Pasadena, the white population is a majority in terms of ethnic composition, with some areas featuring Asians as a majority. This contrasts with cities and communities within the City of Los Angeles to the south and west of the City of South Pasadena, which tend to have more significant majorities of Asian and Latino populations. Of note, in contrast to its neighboring cities, South Pasadena does not have any ethnic group that shows up as a "predominant" gap (more than 50% of the population) as shown in Figure VI-11, although about three-quarters of the city has a "sizeable" gap of white population (between 10% and 50%). As shown in Figure VI-12; the emerging trend is that South Pasadena is experiencing rising levels of diversity, with most of the City seeing increases in diversity index levels from 2010 to 2018. To ensure that racial/ethnic background does not present a barrier to fair housing opportunities, the City will continue to partner with regional organizations to educate tenants, property managers, and real estate professionals about fair housing regulations, serve to mediate/enforce with respect to fair housing issues, as described in Program 5.a, Fair Housing Education, Outreach, and Services. With Council's adoption of the "Sundown Town" resolution in February 2022, the City is also taking measures to address past exclusion by actively including all groups in the city in civic activities, such as advisory boards and commissions, and community recreational and cultural events.

Figure VI-10
REGIONAL DIVERSITY INDEX 2018



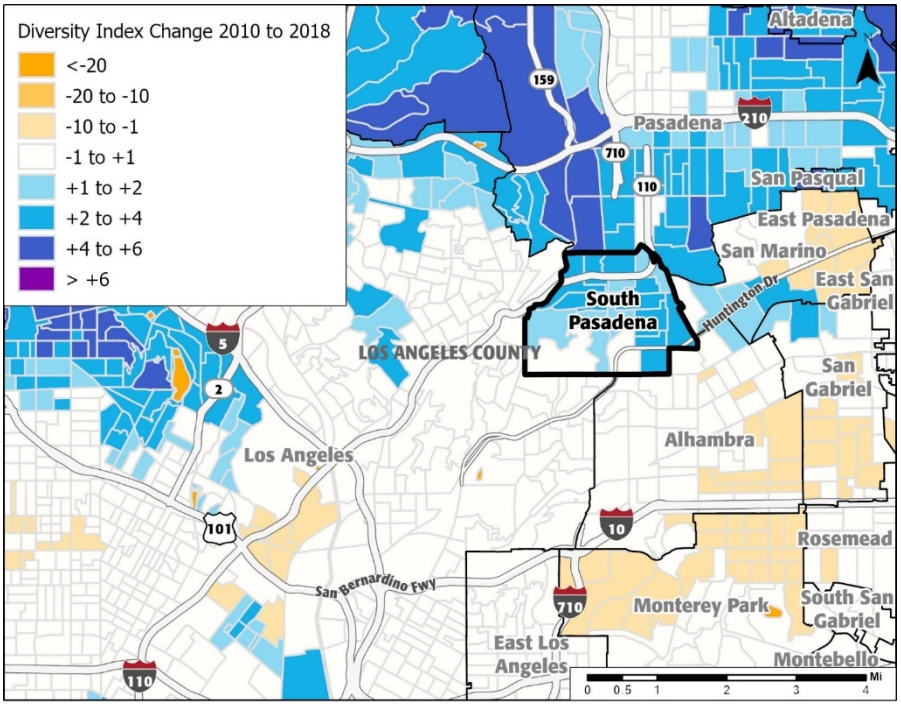
Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Figure VI-11
REGIONAL ETHNIC PREDOMINANCE



Source: U.S. Census Bureau, 2010 Decennial Census[5]

Figure VI-12
REGIONAL CHANGE IN DIVERSITY INDEX 2010-2018

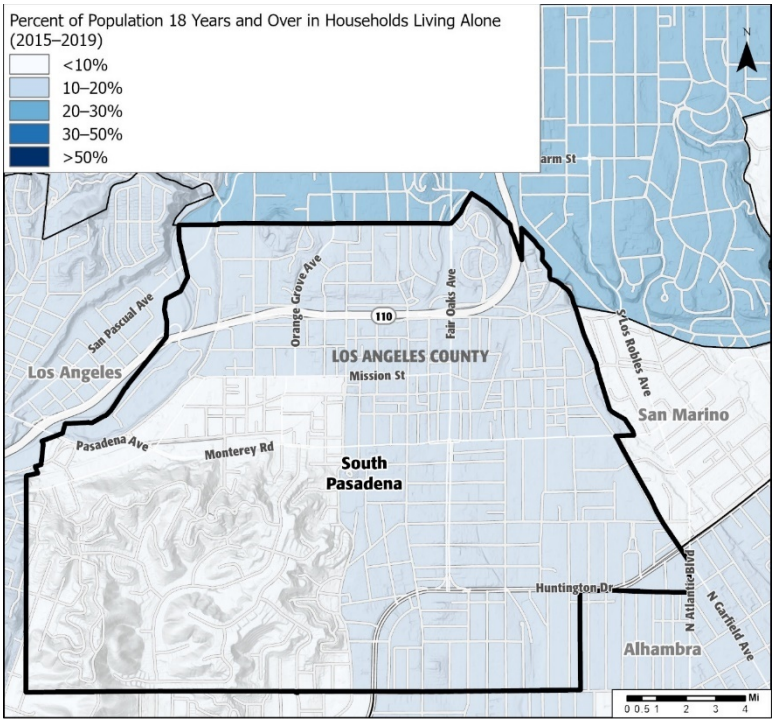


Source: Esri, 2018/2023 Updated Demographic Estimates[9]

Single-Person Household Distribution

As with much of suburban Los Angeles County, South Pasadena was historically developed with a development pattern that allowed only single-family housing in many parts of the City. As shown in Figure VI-13, although different areas of South Pasadena feature varying levels of households living alone versus with a spouse or with children, there is no part of South Pasadena that features especially high levels of individuals living alone. No census tract in South Pasadena features a percentage of individuals over 18 living alone that exceeds 17 percent. This relatively even distribution of single-person households and the relatively low level of single-person households overall would tend to indicate that South Pasadena does not feature any areas of excessive concentration of single-person households, which, if they existed, could be an indicator of discriminatory practices or uneven distribution of unit types. Instead, the trend observed is likely due to an aging population with children leaving the home and couples becoming separated or widowed. As this trend goes to the next logical conclusion, an unknown proportion of the homes are repopulated with family units and are no longer single-person households. Due to the costs associated with purchasing a home, the likelihood is high that such housing units will be populated at some point with a non-single person household.

Figure VI-13
PERCENT OF POPULATION 18 YEARS AND OVER IN HOUSEHOLDS LIVING ALONE

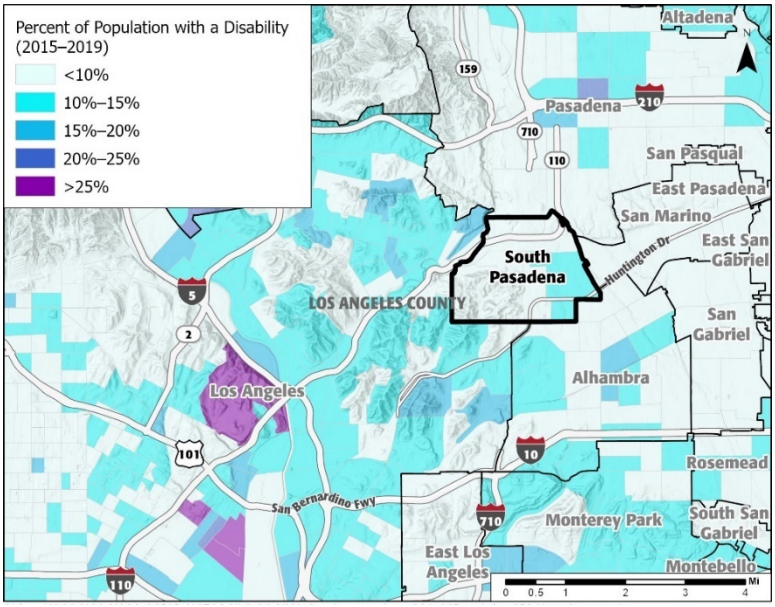


Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Fair Housing for Persons Living with Disabilities

Similarly, as shown in Figure VI-14, South Pasadena does not feature any areas with high concentrations of individuals living with disabilities that would be especially vulnerable from a fair housing perspective due to accessibility concerns or risk of discriminatory actions. However, while South Pasadena features a lower proportion of residents with disabilities than some nearby areas in the City of Los Angeles, resulting in fewer access concerns for current residents, it may be worth considering whether there are factors, such as transit access, cost, or Americans with Disability Act (ADA)-accessible units, that are tending to preclude such individuals from residing in South Pasadena. For these reasons, this Housing Element includes a robust set of programs to ensure that existing housing may be retrofitted for ADA accessibility and new units are designed for ADA or perhaps even "universal" accessibility. Programs 2.g, 4.d, and 4.e would serve to address senior housing, ADA accessibility, and education and incentives for universal design.

Figure VI-14
REGIONAL PERCENT OF POPULATION LIVING WITH A DISABILITY



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Fair Housing for Seniors

To meet the needs of the older population and other individuals with disabilities, there are three assisted living facilities in South Pasadena, all located near the historic Downtown. Additional assisted living facilities are available in surrounding communities. Additionally, the City of South Pasadena offers "Dial-A-Ride," a reservation-based, curb-to-curb paratransit service, to residents within City limits, with service to medical offices in Pasadena, San Marino, Arcadia, and Alhambra. The City requires new developments to comply with Title 24 of the California Building Code to ensure that all new construction meets accessible design standards, thus ensuring that all new multifamily housing is accessible for all residents regardless of disability and promoting accessibility in all housing design. Furthermore, the City ensures that existing housing that may not meet the same accessibility requirements can be adapted as needed through their reasonable accommodation process, discussed

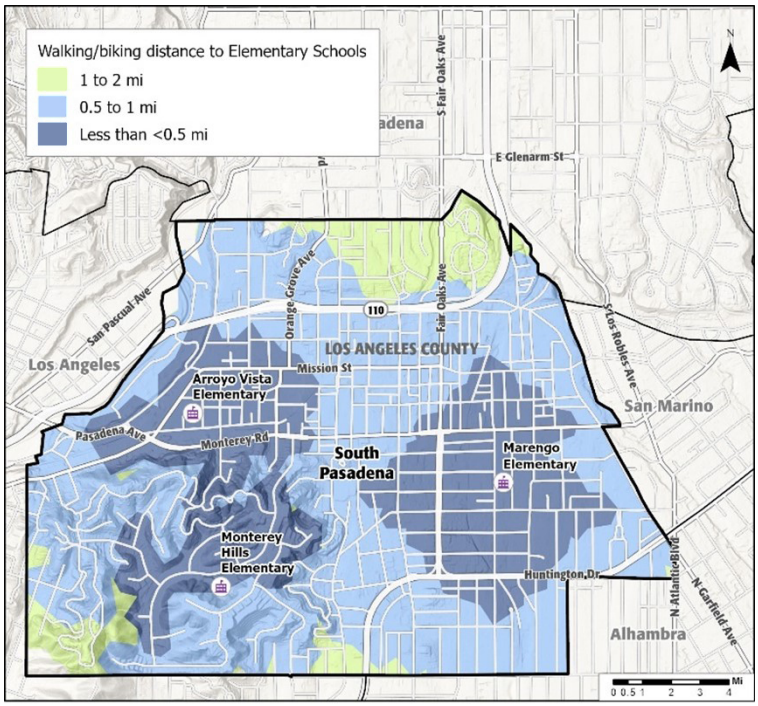
in Section 6.6.2, Governmental Constraints, of this Housing Element, and assistance with rehabilitations (Programs 1.a, 1.b, and 2.g, and Policy 2.4).

6.4.4 Access to Opportunity

Education Resources

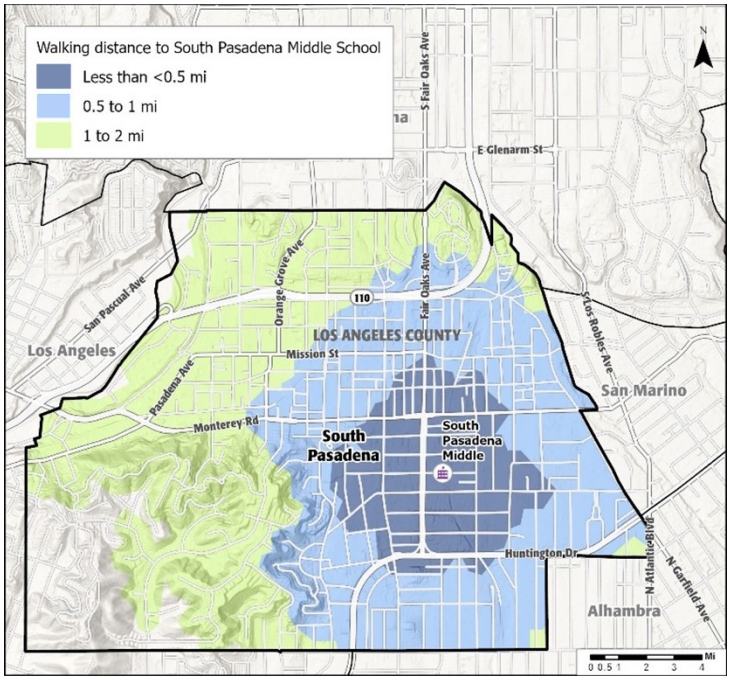
In a statewide review of 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, all of South Pasadena's public schools, including all of its elementary schools as well as its middle and high school, are ranked in the 95th percentile or higher. As shown in Figures VI-15 through VI-17, South Pasadena's elementary schools are distributed relatively evenly throughout the City and its middle and high school are centrally located. Overall, nearly all of South Pasadena is within one mile of a well-ranked public elementary school and within two miles of well-ranked middle and high schools. This generally even geographic distribution of highly ranked schools indicates that new housing anywhere in the City would have good access to educational opportunity in grades K–12, with the highest levels of access in central portions of the City. In addition, South Pasadena is located in close proximity to a number of public and private higher education institutions, including Pasadena City College; California State University, Los Angeles; and the California Institute of Technology; among others. Altogether, this means that virtually the entirety of South Pasadena enjoys strong access to educational opportunity at all grades and education levels.

Figure VI-15
APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA ELEMENTARY SCHOOLS



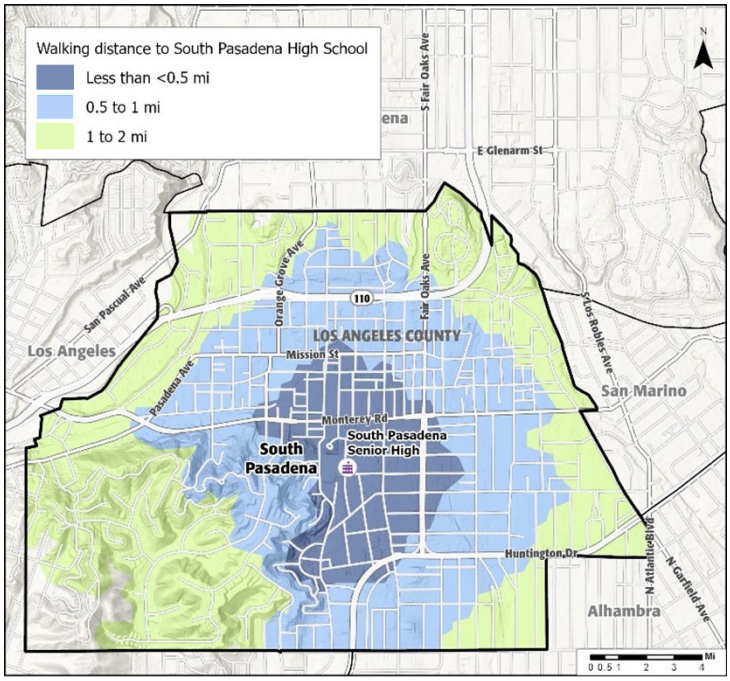
Source: GreenInfo Network, California School Campus Database, 2021[10]

Figure VI-16
APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA MIDDLE SCHOOL



Source: GreenInfo Network, California School Campus Database, 2021[10]

Figure VI-17
APPROXIMATE WALKING DISTANCE TO SOUTH PASADENA HIGH SCHOOL



Source: GreenInfo Network, California School Campus Database, 2021[10]

Public Transportation Resources

South Pasadena residents are served by the Los Angeles County Metropolitan Transportation Authority (Metro) system, which offers light rail, rapid bus, and local/limited bus lines serving South Pasadena and the surrounding area. A variety of transit types and routes are available to residents of South Pasadena to connect them to the historic Downtown, downtown Los Angeles, and crosstown destinations such as medical facilities, jobs, and other services and resources. Areas along Fair Oaks Avenue and Mission Street, especially near the Metro L Line stop, tend to have the best transit service in South Pasadena, while areas in the Monterey Hills neighborhood in the southwest portion of the City have less accessibility to public transportation. However, despite these minor differences in access to transit, AllTransit has given transit in the City of South Pasadena a performance score of 8.5 out of 10, compared to scores of 6.8 in Los Angeles County overall and 5.5 for the SCAG region as a whole[14]. In addition to a strong transit performance score, LA Metro has also approved and begun to implement a program to phase in free travel for all patrons by 2023, as opposed to a standard fare of $1.75 for buses and trains currently or discounted rates for seniors, individuals with disabilities, and college and K-12 students.

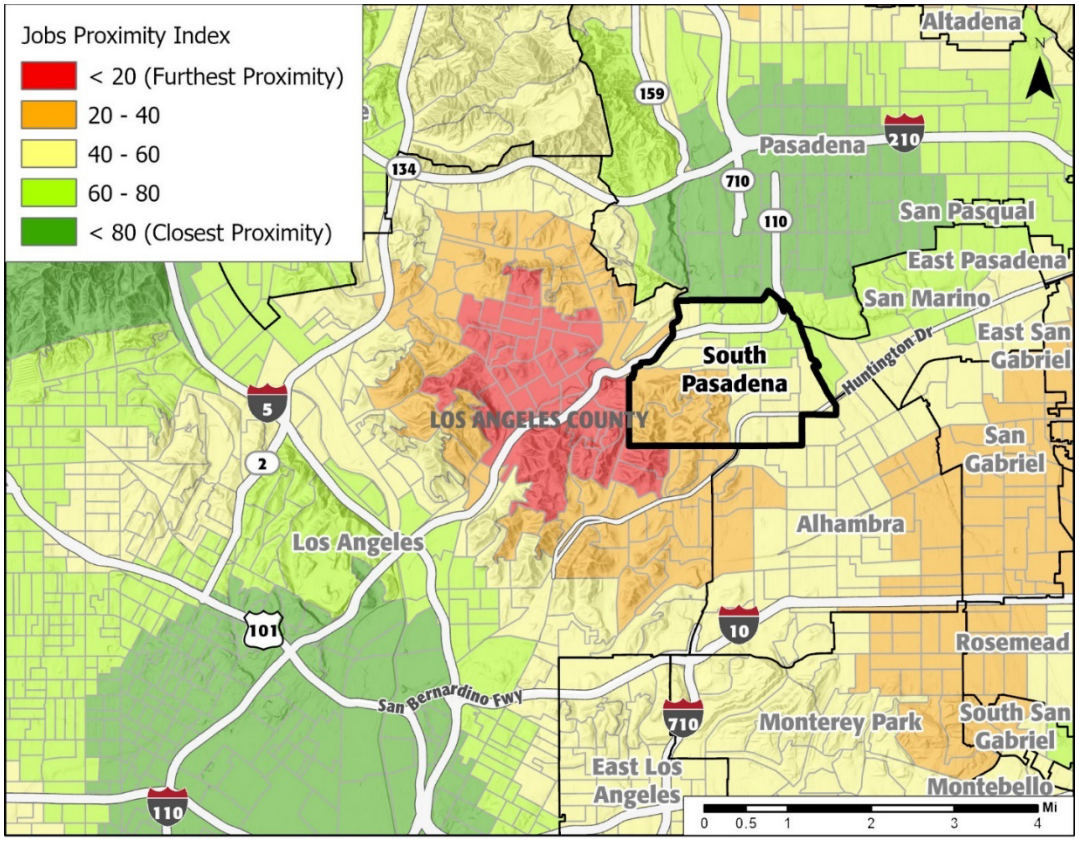
With some variation, the L Line generally runs from approximately 4 a.m. to just after midnight and provides service every 12 minutes during daytime and peak hours during the week and on weekends, with trains roughly every 20 minutes in the early morning and in the evening. Travel time to Union Station in Downtown Los Angeles is approximately 17 minutes from South Pasadena and approximately 6 minutes to Pasadena on weekdays. The 260/762 Rapid lines provide service from roughly 5 a.m. to 11 p.m. on weekdays, with later starts on weekends and Sundays, and peak headways of roughly 20 minutes and off-peak headways of roughly 30 minutes. Overall, much of the City's planned housing, including affordable housing, is in close proximity to these transit lines.

Employment Proximity

In 2017, HUD developed the Jobs Proximity Index as an assessment of accessibility to jobs from a given residential census block neighborhood[15]. The index measures the distance to jobs from each neighborhood, placing a higher weight on larger employment centers that offer more job opportunities. This function provides a general estimate of residential neighborhoods proximity to a large number of job opportunities. As shown in Figure VI-18, most residential neighborhoods in South Pasadena have moderate access to jobs compared to the region, with no areas of the City having the "closest" or "furthest" proximity to jobs. The southwest portions of the City have the most limited access to jobs according to HUD's analysis, and areas in the northern portions of the City have closer access, most notably to job centers to the north in Pasadena. With an average commute time of 31 minutes, South Pasadena has somewhat longer commutes than the national average, but a similar average to Los Angeles County and California overall, according to American Community Survey estimates. Neighboring cities, including Los Angeles, San Marino, and Pasadena, have respective average commute times of approximately 31, 30, and 29 minutes.

[14] AllTransit is a data tool developed by the Center for Neighborhood Technology (CNT) that includes stop, route, and frequency information for 902 transit agencies in metropolitan areas. https://alltransit.cnt.org/about-the-data/
[15] United States Housing and Urban Development Department. *Jobs Proximity Index*, August 10, 2017. https://www.arcgis.com/home/item.html?id=4e2ef54b88084fb5a2554281b2d89a8b

Figure VI-18
REGIONAL JOBS PROXIMITY INDEX



Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, 2014[11]

Environmental Health

A disadvantaged community or environmental justice community ("EJ Community") is identified by the California Environmental Protection Agency ("Cal EPA") as "areas that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation," and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need.[16] In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. In the CalEnviroScreen tool, communities that have a cumulative score in the 75th percentile or above (25 percent highest score census tracts) are those that have been designated as disadvantaged communities under SB 535.[17] The cumulative score for each census tract includes an exposure score, with a low score being a positive outcome, for each of the following:

[16] California Health and Safety Code § 39711
[17] California Office of Environmental Health Hazard Assessment. *SB 535 Disadvantaged* Communities, June 2017. https://oehha.ca.gov/calenviroscreen/sb535

- "Ozone concentrations
- PM2.5 concentrations
- Diesel particulate matter emissions
- Drinking water contaminants
- Children's lead risk from housing for children
- Use of certain high-hazard, high-volatility pesticides
- Toxic releases from facilities
- Traffic impacts[18]"

Communities that are identified as disadvantaged communities based on their cumulative pollution exposure score are targeted for investment through the State cap-and-trade program. However, the condition of these communities pose fair housing concerns due to disproportionate exposure to unhealthy living conditions. In the City of South Pasadena, the cumulative scores of each census tract range from a high of the 34th percentile (north of Mission Street) to a low of the 9th percentile (southwestern corner of the city and southeastern corner of the city). These scores indicate that there are no areas within the City of South Pasadena that meet the criteria to be identified as a disadvantaged community by COEHHA and CalEPA and are not disproportionately exposed to high levels of pollutants compared to other census tracts in the State.

OEHHA's CalEnviroScreen 4.0 Indicator Map reports that pollution burden scores in South Pasadena closely reflect neighboring jurisdictions. Throughout the City, all census tracts score in the 84th percentile or higher for impaired drinking water, while groundwater threats are isolated in the southeastern portion of the City (south of Mission Street and east of Meridian Avenue), and diesel particulate matter exposure is concentrated in the northern portion of South Pasadena (north of Mission Street). While exposure to these pollutants and environmental effects may have a negative impact on residential uses and living conditions, the City's cumulative scores below the 35th percentile indicate that environmental contaminants are not a significant threat to residents. Sources of contamination are likely results of previous activities that have since been, or are in the process of being, mitigated and resolved, therefore removing threats to the city's drinking water. In 1979, industrial solvents and other contaminants were identified in groundwater in the San Gabriel Valley, from which South Pasadena extracts the City's drinking water. The contamination at the site is believed to be the result of decades of improper chemical handling and disposal practices. As a result, water suppliers shut down their wells, and large portions of the basin were placed on the federal Superfund cleanup list in 1984. The subsequent cleanup has cost approximately $500 million, sourced from public funds and the parties responsible for the contamination. Due to this groundwater contamination, the City of South Pasadena has constructed organics treatment systems at the Wilson Reservoir in San Gabriel and the Graves Reservoir in San Marino, where groundwater is extracted and treated to State drinking water standards, then pumped into the City of South Pasadena. The San Gabriel Basin Water Quality Authority has assisted South Pasadena in obtaining substantial grant awards, including $589,000 in 2018 that was expended toward the Wilson Reservoir granulated active carbon (GAC) Treatment System construction, and more recently $2,251,000 from the State Water

[18] California Environmental Protection Agency, California Office of Environmental Health Hazard Assessments. *Update to the California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0 Public Review Draft*, February 2021. https://oehha.ca.gov/media/downloads/calenviroscreen/document/calenviroscreen40reportd12021.pdf

Board Proposition 68 Grant Fund for the Wilson Reservoir treatment construction and operations and maintenance costs.

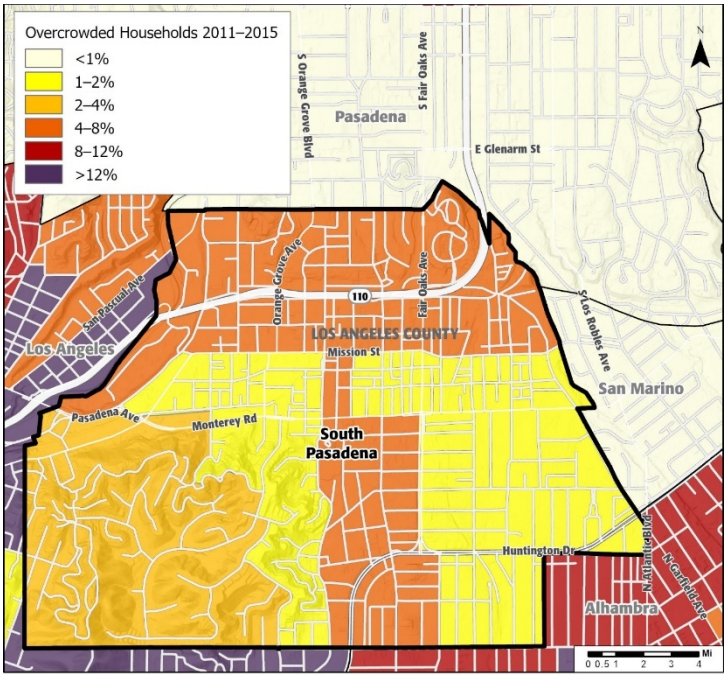
In order to address the potential for any negative living conditions and fair housing concerns that may continue to result from environmental hazards and pollutants, the City will continue to implement mitigation measures at City water sources in San Gabriel and San Marino (Program 1.e). The City will also review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination to reduce exposure to these environmental threats (Program 1.e).

6.4.5 Disproportionate Housing Need and Displacement Risk

Overcrowding as a Fair Housing Issue

As discussed in Section 6.4.3, overcrowding is not a significant issue in South Pasadena, with less than 2 percent of households living in an overcrowded situation citywide. Although it is a minor difference that is not statistically significant, overcrowding is more prevalent among renter households (2 percent) than in owner households (less than 1 percent). As shown in Figures VI-19, the rate of overcrowding is higher in central and northern portions of South Pasadena, generally centered along Fremont Avenue, and in the areas north of Mission Street. Severe overcrowding is generally low except for the central portion south of Mission Street, along Fair Oaks Avenue, where approximately six percent of households are severely overcrowded. The areas with the highest rates of overcrowding and severe overcrowding also tend to have somewhat higher levels of poverty than the remainder of South Pasadena. This pattern of overcrowding matches the region, with slightly higher levels of overcrowding in areas characterized by higher amounts of multifamily housing, which tends to be more affordable. The rate of overcrowding in central and northern portions of South Pasadena may indicate that appropriately-sized housing is unaffordable to current residents, or that the type of housing available does not meet needs. In either case, overcrowding means there is a somewhat greater need for affordable, larger housing units for residents in these areas. The City anticipates that Programs ~~2.j, 2.k,~~ 3.a through 3.m will serve to ensure adequate housing sites are provided and will encourage a variety of housing types to meet the needs of diverse households and family structures.

Figure VI-19
LOCAL HOUSING OVERCROWDING



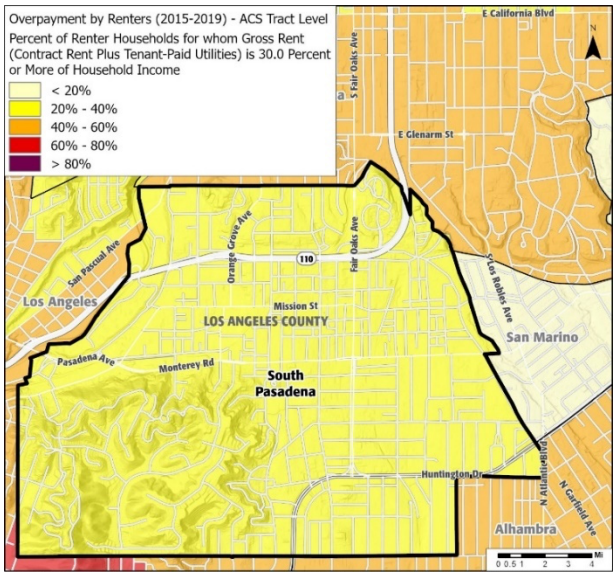
Source: California Health & Human Services Agency, 2020[12]

Overpayment for Housing as a Fair Housing Issue

Not surprisingly, overpayment for housing, which increases a household's risk of displacement, is most commonly experienced by lower income households in South Pasadena, as shown in Tables VI-28 and VI-29, above. For these income groups, more than 86% of owners and more than 72% of renters are considered to be overpaying for shelter, defined as spending more than 30% of their incomes on housing. Geographically, as seen in Figure VI-20, below, the rate of renter households overpaying for housing is within the same range, with an estimated 20–40 percent overpaying for housing. As Figure VI-20 shows, overpayment for this group has decreased over the last five years, except in the southwestern portion of the city where overpayment as increased 0-5%.

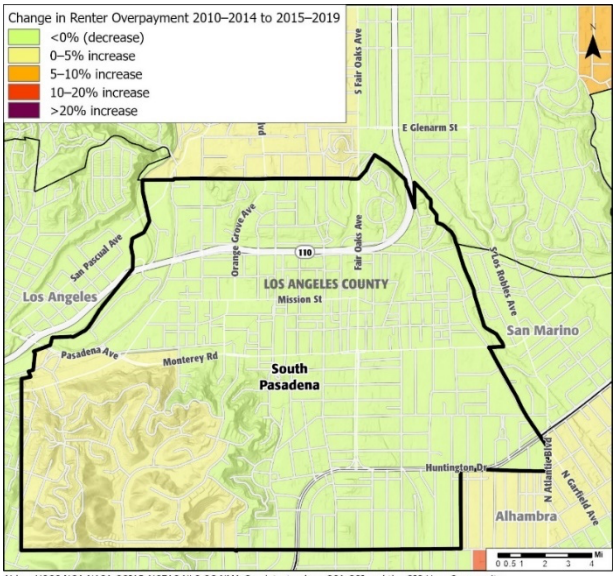
For homeowners, 20-40 percent fall into the category of overpaying for housing in most of the city except in the southeastern area where the overpayment range is 40–60 percent (Figure VI-20). As shown in Figures VI-20 through VI-23, overpayment for housing has increased in two areas of the city, in the central corridor by less than 5%, and in southeast area where the percentage of overpaying households rose 5 to 10 percentage points. The City will seek to address overpayment by creating below-market-rate housing and addressing the overall need for increased housing and affordability. The following programs, enumerated in greater detail in other sections, are designed to work together to address housing creation and affordability through land use changes, inclusionary housing requirements, density bonuses, zoning overlays, Section 8 rental assistance, and other means: Programs 1.b, 1.c, 2.b, 2.c, 2.i, ~~2.j, 2.k,~~ 3.a, 3.b, 3.e, and 3.k.

Figure VI-20
LOCAL OVERPAYMENT BY RENTERS



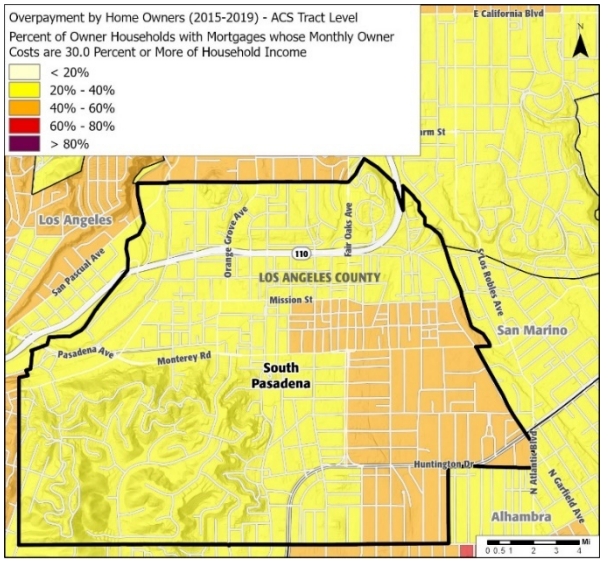
Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-21
CHANGE IN RENTER OVERPAYMENT OVER A FIVE-YEAR PERIOD



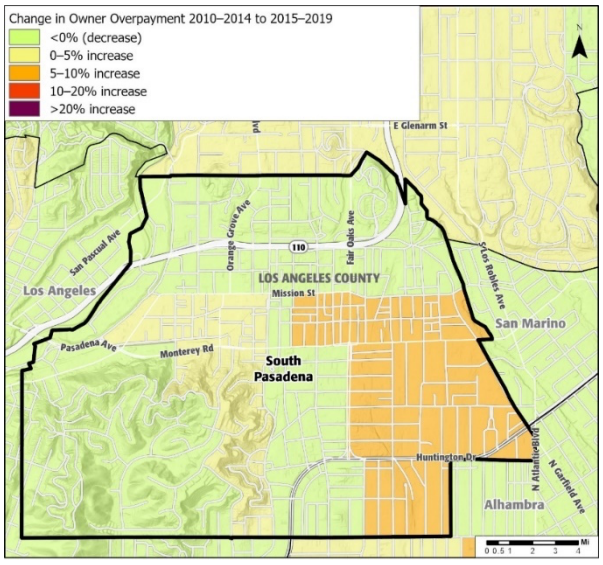
Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7, 8]

Figure VI-22
LOCAL OVERPAYMENT BY OWNERS



Source: U.S. Census Bureau, 2015-2019 American Community Survey[8]

Figure VI-23
CHANGE IN OWNER OVERPAYMENT OVER A FIVE-YEAR PERIOD



Sources: U.S. Census Bureau, 2010-2014 American Community Survey and 2015-2019 American Community Survey[7, 8]

Housing Stock Concerns for Fair Housing

Although South Pasadena's housing stock tends to be somewhat older, the City is not characterized by major deficiencies regarding housing deterioration or livability issues. As discussed previously in this section (see "Age and Condition of Housing Stock"), approximately 37 percent of the City's housing units were built in 1939 or earlier and 94 percent of the housing stock is over 30 years old, with 1952 being the median year of construction (see Table VI-25). Nevertheless, the majority of South Pasadena's housing stock is well maintained and in good condition, with only some instances of residential properties with signs of deterioration and deferred maintenance. As the housing stock ages, need for repair and rehabilitation may become more common, thus increasing the risk of displacement for occupants of those units, and in particular for low-income seniors. This would be addressed with a Housing Rehabilitation for low- and moderate-income households, and other programs designed to support seniors to stay in their homes or to find other housing within South Pasadena that meets their needs (Programs 1.c and 2.g). Additionally, the City will continue to use its code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena (Policy 1.2), particularly for rental units. Additionally, the City's contracted housing rights and tenant protection agency assists tenants with disabilities by enforcing Fair Housing requirements to grant reasonable accommodation or modification requests.

Homelessness

The Los Angeles Homeless Services Authority (LAHSA) divides Los Angeles County into eight Service Planning Areas (SPAs) so the organization and individual jurisdictions can better serve and meet the needs of the communities in these areas. The City of South Pasadena is within Service Planning Area 3 (SPA-3): San Gabriel Valley, which includes communities located in the eastern portion of Los Angeles County. The 2022 Homeless Point-in-Time (PIT) count conducted by LAHSA counted a total of 4,661 homeless persons in SPA-3, of which 50 identified as residing in the City of South Pasadena (less than 0.01 percent of the SPA-3 homeless population). Approximately 64 percent of the total homeless population of SPA-3, or 2,985 people, were considered unsheltered and 36 percent, or 1,676 people, were sheltered. Additionally, approximately 228 households in SPA-3, or 5 percent of households, had at least one child under 18 and one adult over 18; there was one unaccompanied minor recorded in a shelter in SPA 3.

According to the LAHSA in 2022, approximately 56 percent of the total homeless population in SPA-3 identified as Hispanic or Latino, 17 percent identified as Black or African American, under one percent identified as American Indian, Alaska Native, Asian, and multi-racial. Additionally, 21 percent were experiencing serious mentally illness, 18 percent had a physical disability, ten percent had a developmental disability, 6 percent were seniors, and six percent were veterans. Of the homeless population in SPA-3, four percent identified as gay or lesbian, four percent as bisexual, and three percent as questioning their sexual orientation. Given the small size of South Pasadena's homeless population, it is unlikely that all of these protected classes are represented. However, without data available at the city-level, it is assumed that the percentages of each protected class applies to the 50-person homeless population in the city. Under this assumption, the following groups may be disproportionately represented as part of the homeless population compared to the total city population:

- Non-White persons, including those that identify as Hispanic or Latino and Black or African American (45 percent of city population).
- Persons with disabilities (Seven percent of the city population).
- Persons with developmental disabilities (One percent of city population).

Citywide data regarding sexual orientation is unavailable to compare to the percentage of the SPA-3 homeless population. However, while the percentages of each protected class identified here may not be the exact demographic composition of the homeless population in South Pasadena, as part of the SPA-3 region, there is a need for targeted assistance and outreach of each of these populations.

In order to address the needs of the homeless population, the City has identified Program 2.f to continue its emergency shelter referral program and use multi-jurisdictional grand funding received from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments. Additionally, under Policy 4.4., the City will incentivize housing providers to meet the housing needs of extremely low-income persons, persons with mental and physical disabilities, and other special needs groups. Moreover, the City has included Program 4.b to amend the Zoning Code to fully address SB 2 requirements regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Gentrification and Displacement Risk

The Urban Displacement Project identified neighborhoods in the Los Angeles region that have experienced gentrification since 2000 as a part of their project to predict trends of gentrification and displacement based on a community-engaged research process of market trends, housing, and jobs growth. The Urban Displacement Project defines gentrification as "a process of neighborhood change that includes economic change in a historically disinvested neighborhood — by means of real estate investment and new higher-income residents moving in — as well as demographic change — not only in terms of income level, but also in terms of changes in the education level or racial make-up of residents".[1] Renewed interest in city neighborhoods can lead to or accelerate the displacement of residents, typically low-income communities of color, due to rising commercial and residential rents and property values.

In South Pasadena, the Urban Displacement Project identified the area east of Fair Oaks Avenue and the area south of Mission Street between Meridian Avenue and Indiana Avenue as "Stable/Advanced Exclusive," meaning that the census tracts in these areas are high income, housing is only affordable to high-income households, and there has been a notable increase in housing costs since 2000. These neighborhoods are noted to have already gentrified and to exclude lower- and moderate-income households. The remaining areas south of Mission Street, west of Indiana Avenue and between Meridian and Fair Oaks Avenues, are considered "At Risk of Becoming Exclusive" and "Becoming Exclusive," respectively. These both indicate a trend toward moderate- and high-income households, increasing housing costs, and increasing unaffordability. All of these areas suggest historic displacement of lower- and moderate-income households as neighborhoods gentrified, and now may present a barrier to entry for these households. Paired with racially and ethnically exclusive practices discussed in Section 6.4.6, displacement of lower- and moderate-income minority households was particularly exacerbated during the mid-20th century. While the area north of Mission Street and west

of Fair Oaks Avenue is considered "Stable Moderate/Mixed Income," suggesting lower displacement risks due to housing costs and incomes, most of the City of South Pasadena is exclusive or becoming exclusive according to the Urban Displacement Project.

Displacement risk can also be identified by comparing annual rates of increase in average home value or rental price compared with annual changes in the average income. If home costs outpace wage increases, displacement risk increases. As shown in Figure VI-3 of Section 6.3.7 of this Housing Element, the median home sales price in South Pasadena increased 223 percent between 2000 and 2018, compared to 151 percent in the SCAG region. This results in an average annual increase of 12.4 percent in South Pasadena and 8.4 percent in the SCAG region. Rental prices have also increased significantly since 2015, with an average annual increase ranging from 5.7 percent for studio apartments to 8.7 percent for 3-bedrooms according to Zumper, an online database of rental prices for houses, condominiums, apartments, and other housing types. Currently, home prices for ownership units are affordable only to above moderate-income households while studio and one-bedroom units priced at the lower end of the spectrum are affordable to lower-income households while all larger units are affordable only to above moderate-income households.

In comparison to housing prices, wages have increased at a slower rate. The median income in South Pasadena has increased approximately 3.4 percent annually, from $82,340 in 2010 to $109,927 in 2020 according to the American Community Survey. The difference in these trends indicates growing unaffordability of housing in South Pasadena, as is the case throughout the region and state. In order to address affordability challenges, the City has identified the following programs to incentivize development of affordable units, facilitate mobility options, and reduce displacement risk for lower- and moderate-income households throughout South Pasadena:

- **Program 1.c.** Proactively pursue abatement of substandard housing conditions to reduce displacement of tenants from these units.
- **Program 1.d.** Monitor deed-restricted housing units in the city and work with property owners and, if necessary, local service providers to preserve affordability.
- **Program 2.c.** Provide lower-income households with information on CalHome funding to help residents become or remain homeowners.
- **Program 2.g.** Expand the supply of housing for seniors to increase opportunities for households to access or remain in South Pasadena.
- **Program 2.h.** Work with developers to expand housing opportunities for lower-income households and special needs groups.
- **Program 2.i**. Monitor implementation of the inclusionary housing ordinance and revise if needed to effectively achieve construction of affordable housing units in projects throughout the city.
- ~~**Programs 2.j and 2.k.** Establish an Affordable Housing Overlay zone and land use designation to be applied to sites outside of the Downtown and Mixed-Use districts to provide housing mobility opportunities in high resource and affluent areas.~~
- **Programs 3.h and 3.g.** Encourage the construction of ADUs and monitor construction to track affordability

6.4.6 South Pasadena History

The following history provides some context and acknowledgement of discrimination in the past to recognize that South Pasadena must reckon with past racism within the community that precluded the opportunity to become a homeowner in the City based on race, as discussed further below. The City Council acknowledged and condemned these past practices in Resolution No. 7750 (The "Sundown Town" resolution), which was unanimously adopted on February 2, 2022. The Council directed staff to take specific steps, including removal of racially-based restrictive covenants that may still exist (but are not enforced) on property titles throughout the city, beginning with those owned by the City (see Program 5.c). This important step of acknowledgement demonstrates a shift that has occurred within the community over time, and the Council's growing commitment to affirmatively advance equality in housing opportunities to all persons regardless of ethnic group or race, so that all are offered the opportunity to live in and benefit from the high level of resources and quality of life available in South Pasadena.

Historic Land Development Patterns

Incorporated in 1888, South Pasadena was one of the first municipalities in the Los Angeles area and has featured relatively stable boundaries since initial incorporation, even as its population has grown dramatically. With roots as an agricultural community growing mostly citrus, South Pasadena eventually become a streetcar suburb of Los Angeles with the extension of a Pacific Electric transit line to the City in the early twentieth century. The City grew quickly, seeing high double-digit and even triple-digit decadal growth rates between 1900 and 1930. Low double-digit decadal growth continued until the mid-twentieth century, when most of South Pasadena's land was almost completely built out. Since that time, the population of South Pasadena has generally fluctuated within a range of approximately 22,000 to 25,000 residents. These historical trends are reflected in South Pasadena's development pattern, with the oldest neighborhoods lying close to the former streetcar lines and newer development in more distant and hilly areas that would, in earlier times, have been less accessible or not feasible for construction. The more central portions of the City that were close to the historical streetcar lines are also the areas that feature most of the City's multifamily housing, including units that may be more affordable to households with medium or lower incomes. Additional areas of multifamily housing are found in the northern and especially northeastern areas of the City.[19] The City grew at a time when single-family housing dominated residential development in Los Angeles County, including construction of large estates built when land was relatively inexpensive in the area north of Downtown Los Angeles. Thus, a large portion of the city is designated as single-family. While this has checked population growth for more than half a century, as described above, the City does not have directive growth control policies in place. However, the City's voter-approved height limit presents a physical constraint to multifamily housing development that reduces the number, size, and quality of units that can be built even if the density allows more. Projects that receive state density bonuses and incentives, including most projects subject to the City's inclusionary housing regulations, are eligible for waivers of this limit, which will support more affordable housing in the 6th Cycle period.

[19] City of South Pasadena. "History." City of South Pasadena Website. Retrieved February 22, 2021. https://www.southpasadenaca.gov/visitors/history

Mid-20th Century Racial Exclusion

Historically, "Sundown Towns" are communities, neighborhoods, or counties that excluded African Americans and other minority groups through the use of discriminatory laws, harassment, and the threat or use of violence. The name is derived from the posted and verbal warnings issued to such groups – particularly African Americans – that although they might be allowed to work or travel in a community during the daytime, they must leave by sundown. No official ordinance or law of the City of South Pasadena has been found imposing sundown restrictions, but the collective oral and written history, public accounts, and newspaper articles explicitly demonstrates South Pasadena's history as a "sundown town" for a significant portion of the 20th century.

The years during and after the Second World War witnessed open racial exclusion in the South Pasadena community. A newspaper account that appeared in the California Eagle on Thursday, September 12, 1946, *(So. Pasadena for 'Whites Only,' Says City Mgr. Telling of Racial Bars*) reported that South Pasadena City Manager Frank Clough had revealed that week that since 1941, the City had been "writing restrictive covenants into the deeds of all property obtained by the city through delinquent taxes." The article further quotes Clough as saying:

> "We do not have any negroes nor do we have any other non-Caucasian people in South Pasadena. To ensure the continuance of this policy, several years ago the city council instructed the city attorney to draw up a restrictive clause and insert it into all properties coming into possession of the city."

Clough acknowledged that the Council had not officially adopted such a policy and indicated that the actions had been requested through an internal memo to the city manager and city attorney.

The article goes on to refer to a campaign conducted by a group called the South Pasadenans, which Clough said was "headed by some prominent persons" to develop a system of racial exclusion through property deed restrictions. That campaign is also noted in an article in the South Pasadena Review (*Satisfactory Progress Being Made in Race Restriction Campaign*, December 26, 1941), which reports, from a very different perspective than The Eagle, that South Pasadenans Inc., a city-wide non-profit organization "with a membership of several hundred civic-minded citizens for the purpose of sponsoring an improvement program" that would "restrict the use of property in South Pasadena to members of the Caucasian race" had met at city hall. At that time, prior to the 1948 Supreme Court ruling in Shelley v. Kraemer, these covenants were not illegal, as the leader of South Pasadenans, Inc. assured property owners in the South Pasadena Review. According to the California Eagle article, by 1946, the City Manager announced that 85% of all land in the city had been recorded with the restrictive deeds, for which property owners paid the South Pasadenans a fee of $5 "for the recording and operating expenses of the group." Two years later, those deeds became legally unenforceable, but were not necessarily removed.

Earlier in the decade, in 1942, in response to Executive Order 9066 requiring the relocation of persons of Japanese ancestry to internment camps, 165 Japanese-American residents of South Pasadena were forced to evacuate South Pasadena. There is not clarity as to what happened to homes that were evacuated by these residents. The South Pasadena Review (*What will Become of Homes Vacated By Japanese Families?*, April 3, 1942) reported on a Chamber of Commerce meeting at which the attendees' primary concern in regard to the imminent deportation of the Japanese community that would leave 47 homes vacant was the prospect that these homes would become occupied by

"undesirables" and would "soon be snapped up by colored families moving down from Pasadena or surrounding communities." Mayor Andrew O. Porter, present at the meeting, responded to suggestions that properties be improved so as to be too expensive for such families, by saying that the City cannot exercise any control over these properties and that the responsibility for improvement rests with the owner of the property. The group's effort to keep blacks and other minority groups out of South Pasadena appears to have been effective, given City Manager Clough's declaration in 1946 (above) in regard to the racial profile of the city's residents.

Though racial covenants had been allowed and upheld by earlier Supreme Court rulings, they were challenged through many lawsuits, and the 1948 Supreme Court ruling in Shelley v. Kraemer determined them to be a violation of the 14th amendment, which guarantees equal protection under the law. While existing covenants were not allowed to be enforced by the courts, actions by private sellers persisted covertly throughout the Los Angeles region for many years afterward in the mid-twentieth century, and it took many years for non-whites to slowly begin to be able to buy homes in areas with histories of overt racial exclusion, including South Pasadena. Such government-sanctioned forms of discrimination have long-since been eliminated and the racial and ethnic population in South Pasadena has significantly diversified over time. However, the prior race- and ethnic-based socio-economic discrimination had a long-term impact on racial diversity in the City. With the current high residential property values discussed earlier in this chapter, the cost of moving into South Pasadena is now the primary barrier for households seeking to locate within South Pasadena.

The 1963 General Plan

The City adopted a new General Plan in 1963, which forecast a population that would grow to between 28,050 and 31,270. The new units in the city were anticipated to come from build-out of the Monterey Hills area (low density single-family), and some new apartment development. The first three objectives of the Land Use Plan were stated as:

- To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential, where stability and exclusiveness are desired;

- To guide orderly transition of older residential areas from a lower to a higher density – where increased density is desirable.

- To establish a scale of densities and development standards which are in keeping with the kinds of housing that should be encouraged in the future.

The language of these objectives appears to indicate that the South Pasadena community was holding onto its perceived "stability and exclusiveness," terms that are often proxies for racist intent to keep people out of the community. The plan did allow for additional multi-family residential uses, built on a principle that allowed increased density with increased parcel size to produce a more suburban approach with lower heights and higher setbacks from surrounding development.

Thirty-five years later, in 1998, the City's population remained well below the 1963 forecast, as it does today. The Vision Statement in the 1998 General Plan, excerpted from a 1990 Task Force, which became the basis for the guiding principles, included the following:

As the new decade begins, however, South Pasadena is faced with the ***twin threats of burgeoning multi-residential growth*** *and continued deterioration of its commercial areas and business tax base. In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added).*

The community's self-reflection and desire for the future was clearly rooted in maintaining a status quo, as demonstrated by the perception that multi-family housing was a "threat." The 1998 General Plan Update also came in the midst of the 710 Freeway fight against CalTrans, and focused on the City's proud independence as a "distinct – and distinctive – community" with a small town character. Like the 1963 plan, a focus on neighborhood protection was a guiding principle, incorporating the historic preservation movement that had grown in importance since the previous General Plan was adopted.

The 1998 Plan incrementally downzoned residential land, reducing the number of acres designated as high density residential use and increasing the medium density zoning along with more land area for low density and estate. Transition areas were identified to absorb most of the change. Using terms like "managed change" and (single-family) "neighborhood protection," the plan sought to maintain a balance that would support the vision of a small town atmosphere. With that in mind, most new units were anticipated to be in the multi-family areas, with an expectation that about 870 units would be added by 2010.

More Recent Exclusion

Illegal real estate practices against minority persons buying homes persisted in South Pasadena past the mid-20th century. In the mid-1960s the Federal government provided funding for affordable housing within the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents. South Pasadena has enacted slow growth regulations more recently than the mid- to late-20th century including in the 1980s when the City reduced the allowed residential densities across the city, thus decreasing the City's target population from over 60,000, assumed in the City's first General Plan in 1960, to less than 30,000 in the 1998 General Plan. While not a direct growth management strategy, such as urban limit lines or annual caps on building permits, the result of downzoning was slowed residential growth in South Pasadena. Slow-growth strategies often have indirect racist overtones, particularly slow-growth furthered by reducing densities, by prioritizing lower density housing types, which often are more expensive to purchase or rent than smaller, middle- and high-density housing types. While not directly discriminatory, this prioritization can present a barrier to lower- and moderate-income households to live in the city, which can result in both income and racial isolation. As such, slow-growth efforts may have influenced demographic characteristics in South Pasadena, as discussed in the excerpt from the Colorado Boulevard, below.

"Compared to other local sundown towns, South Pasadena held out a little longer before finally denouncing and condemning its historical systems and policies and cultural norms that had been used to fashion South Pasadena into a 'Sundown Town.' It held onto this heritage and often fought for it for 74 long and event-filled years after the Supreme Court had made its decision. Underlying the 100 years of prejudicial laws were the attitudes of the individuals behind them. The South Pasadenans Inc., the Chamber of Commerce, the Race Restriction committees, the realtors, the police, the title and deed companies, the bankers, the lawyers and the politicians who fought to develop and defend these policies reflected the racists who dominated the political landscape of South Pasadena for over 100 years. It may sound simplistic, but it needs to be stated: It is racist people that make and support racist laws, policies and practices. Laws supporting racism can be struck down, 'official documents' can be scrubbed of evidence, history can be un-written, but what impact does that have on the racism that thrived there for so long?

Currently, while the City of South Pasadena is attempting to legally move from its past, racists are still agitating there, trying to promote an agenda of race-based hate and separation. Fewer in number, 2018 saw them reduced to creeping in the shadows, targeting the South Pasadena High School with 'stickers' to promote their fear. In 2020, similar expressions of white nationalist fear were distributed as slogans found on leaflets, and nails were placed in the driveways of South Pasadena residents who exhibited support for the Black Lives Matter movement.

Today, most residents of South Pasadena would not support the racist laws and policies of the past, but clearly there is still much more work to be done. Understanding the past is a critical part of the process of reflection and growth. The City of South Pasadena lagged behind and did not take a lead role. Now, more than ever it's up to the residents of South Pasadena to push the City toward a new and different future that better represents the current population."

Excerpt from "When South Pasadena Was a Sundown Town", authored by Jerry Friedman and published April 17, 2022 in the digital Colorado Boulevard newspaper.

Investment Patterns

Investment can be for routine maintenance of public infrastructure, such as roadways, as well as larger projects that address public need, such as parks and recreation facilities, office buildings, and more. Historically, investment in the City of South Pasadena has been prioritized based on physical need and condition of the existing public infrastructure or facilities which has prevented disinvestment in any particular area of the city. Investment is based on public demand and benefits all residents. Projects in the 2022-2023 Capital Improvement Program (CIP) that specifically target increased access to resources and neighborhood revitalization in areas with slightly higher rates of poverty include:

South Pasadena Library: The South Pasadena Library projects include repairs, remodeling, and upgrades within the library that offer amenities to visitors. The South Pasadena Library complex also serves as a cooling center for those that do not have access to, or cannot afford, residential air conditioning (AC), and the CIP lists a backup AC unit and sustainable solar power system as proposed projects. These projects have not been completed yet and may be funded in part by a State Library infrastructure grant, requiring matching funds from the City.

Fremont/Huntington Mobility Active Transportation Project: The mobility improvements along Huntington Drive and Fremont Avenue include bike facilities, curb ramp improvements for safer pedestrian crossings, high visibility crosswalks that include flashing beacons, and modification of the medians to install bike facilities and provide refuge island areas for safer crossings. The project will also add street fixtures like bus benches, trash receptacles, and bus shelters. This project is in progress with some short-term measures, such as adding striping and signage and activating the northbound right turn traffic signal at Freemont Avenue and Huntington Drive, with most other measures still underway.

North-South Corridor (Fair Oaks) ITS Deployment: The project includes a traffic study on Fair Oaks Avenue and the design and construction of signal synchronization including intelligent transportation system (ITS) to facilitate vehicular, bicycle, and pedestrian movement along the Fair Oaks Avenue corridor and adjacent corridors/streets – including transit bus prioritization. The project components include an advanced adaptive traffic management system, a travel time and delay monitoring system, a queue detection system, an infrared bike, pedestrian and vehicle detection, an adaptive pedestrian warning system, a dilemma zone detection system, emergency vehicle detection, transit system prioritization, and an update of the traffic systems and controllers to accommodate the ITS components. This project is projected for fiscal year 2023 and beyond.

Slow Street Program: Though not a CIP project, the Slow Street Program targets major transportation corridors, including Hermosa Street, Grand Avenue, Mission Street, and Oak Street. The intent of this program is to invest in place-based revitalization through placemaking, improved pedestrian experiences, and active transportation spaces. The City engaged the public in designing this program through a residential survey and door-to-door canvassing to identify the target corridors and assess resident desire for slower streets, one-on-one meetings with Mission Street stakeholders, a focus group with the Chamber of Commerce Economic Development Committee, and a community tour of Glendora Village. The public expressed a desire for a program to slow vehicle speeds, create safer pedestrian crossings, add greening and shade, create consistent east-west design across Mission Street, and maintain or add vehicle parking. The program includes temporary demonstrations including temporary striping, curb extensions using reflective delineators, and bicycle lanes using short-term paint/tape and signs. Temporary parklet structures are added to create usable street space, and other placemaking elements like furniture, plants, and art pieces are also incorporated. The goal of the program is to provide the community an opportunity to envision potential permanent reconfigurations of Mission Street and other major corridors.

The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles.

Land Use and Zoning Practices

The Othering & Belonging Institute, a University of California Berkeley research center, published a report in March 2022 analyzing the characteristics of 191 communities in the Greater Los Angeles region in relation to the degree of single-family zoning. The report found that jurisdictions with the highest proportion of exclusively single-family zoning had the highest percentage of White residents, lower rates of diversity generally, higher median incomes, higher home values, proficient schools, and

concentrations of other amenities and resources that are associated with the high and highest resource designations in TCAC/HCD opportunity maps. The Othering & Belonging Institute divided the zoning in each jurisdiction into three categories for the analysis, defined as follows:

- **Single Family Residential**: Land designated for detached, single-family residential land use (one or two dwelling units per parcel of land).
- **Other Residential:** Land designated to allow for multiple dwelling units per parcel of land or a blend of multiple uses that includes residential use.
- **Non-Residential:** Land designated for non-residential uses such as parks and open space, commercial, and industrial.

As part of the analysis, land that is not developable, such as streets, waterways, and other similar areas, were removed.

Zoning data for the City of South Pasadena was accessed in August 2021 and it was found that approximately 75.0 percent of all residentially zoned land is zoned exclusively for one or two dwelling units per parcel. While these zones do allow ADUs, JADUs, transitional and supportive housing, and are now subject to lot-splits under Senate Bill (SB) 9, they do not currently allow higher density housing such as apartments or condominiums which likely resulted in the socio-economic patterns identified in this Assessment of Fair Housing. Across the SCAG region, approximately 77.7 percent of residential land is currently zoned for single-family uses, with an average of 72.0 percent of land in each jurisdiction falling into this category. Therefore, while South Pasadena is slightly higher than average, it is reflective of zoning and land use patterns throughout the region.

However, this does not negate the potential impacts on fair housing and socio-economic patterns that result from the dominance of single family zoning in South Pasadena. Therefore, in an effort to combat past patterns and affirmatively further fair housing, the City has included the following programs:

- Program 2.e to encourage density bonuses in conjunction with the Inclusionary Housing ordinance to increase the supply of affordable units.
- Program 2.k to create and apply an Affordable Housing Overlay outside of the Downtown and Mixed Use districts to allow up to 30 dwelling units per acre in these areas.
- Programs 3.f, 3.g, 3.h, 3.i, 3.j, and 3.k to encourage production of ADUs to increase density in existing single-family neighborhoods.
- Program 3.m to adopt a permanent ordinance to increase the supply of affordable units in high opportunity neighborhoods.

6.4.7 Enforcement of Fair Housing and Outreach Capacity

The City enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of City policies and code for compliance with California law and referring fair housing complaints to appropriate agencies. The City of South Pasadena refers fair housing complaints to the housing rights and tenant protection agency contracted with the City and maintains a Housing Support page on the City's website to assist access for community members. The role of the housing rights and tenant protection agency is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by

the housing rights and tenant protection agency include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs.

Over the past five years, Housing Rights Center (HRC) has provided fair housing services as the City's contracted housing rights and tenant protection agency. As part of outreach efforts, HRC provided the City with fair housing cases and inquiries managed by the organization in the last 5 years to identify patterns and specific housing needs. Discrimination towards those with mental and physical disabilities was the most common subject of inquiries and cases across all years, as shown in Table VI-32A. Discrimination cases have remained relatively low since fiscal year 2016/2017, with a peak of 7 cases during fiscal year 2019/2020. While cases and inquiries specifically related to discrimination are relatively low in South Pasadena, HRC provided other housing services to 410 individuals during the five year period. These services included providing information and counseling on a variety of tenant-landlord rights and obligations, including, but not limited to, rent increases, lease terms, repairs, and pets. The most common issue raised is regarding noticing (20 percent of questions), followed by rent increases (17 percent) and substandard conditions (13 percent). Across both housing issues and discrimination cases and inquiries, approximately 84 percent of calls were made to HRC by in-place tenants, followed by seven percent of calls from those seeking rental housing. HRC also received calls from landlords, realtors, managers, and homebuyers. Of the hundreds of South Pasadena cases and inquiries, the HRC confirmed that none were made against the City of South Pasadena, LA County, or any public housing authority.

As part of the Fair Housing Assistance Program (FHAP), the California Department of Fair Employment & Housing (DFEH) files fair housing cases with HUD's Region IX Office of Fair Housing and with the Equal Opportunity (FHEO); HUD FHEO reported that just 10 cases were filed by residents of the City of South Pasadena between January 1, 2013, and March 23, 2021. Among these cases, four were based on disability, three were based on national origin, two were based on familial status, and one was based on familial status and race. Of these 10 cases, 8 resulted in a no-cause determination, one was withdrawn after external settlement, and one, which was based on a complaint regarding physical disability, had a successful conciliation/settlement. No cases were made against the City or other public entities in South Pasadena.

None of these fair housing agencies provided specific location information for cases, either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the City was unable to conduct a spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the City. Policy 5.1 has been included to participate in the

Table VI-32A
HRC DISCRIMINATION INQUIRIES AND CASES

PROTECTED CLASS	FISCAL YEAR 2016/2017		FISCAL YEAR 2017/2018		FISCAL YEAR 2018/2019		FISCAL YEAR 2019/2020		FISCAL YEAR 2020/2021	
	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL	COUNT	PERCENT OF TOTAL
Discrimination Inquiries										
Gender	0	0%	0	0%	1	14%	0	0%	0	0%
Source of Income	0	0%	0	0%	0	0%	1	5%	0	0%
Mental Disability	4	44%	2	18%	1	14%	5	25%	1	13%
Physical Disability	3	33%	6	55%	5	71%	10	50%	5	63%
Familial Status	0	0%	3	27%	0	0%	4	20%	2	25%
Race	1	11%	0	0%	0	0%	0	0%	0	0%
Other	1	11%	0	0%	0	0%	0	0%	0	0%
Total	9	100%	11	100%	7	100%	20	100%	8	100%
Discrimination Cases										
Gender	0	0%	0	0%	1	50%	0	0%	0	0%
Source of Income	0	0%	0	0%	0	0%	0	0%	0	0%
Mental Disability	1	50%	0	0%	0	0%	2	29%	0	0%
Physical Disability	0	0%	1	100%	1	50%	3	43%	0	0%
Familial Status	0	0%	0	0%	0	0%	2	29%	1	100%
Race	1	50%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%
Total	**2**	**100%**	**1**	**100%**	**2**	**100%**	**7**	**100%**	**1**	**100%**

Source: Housing Rights Center, 2016-2021

programs offered by the HRC and provide public information at City Hall or through the City's website, regarding fair housing issues and HRC consultation.

While historically, exclusionary policies and practices may have resulted in fair housing lawsuits against the City, this has not been the case in recent decades. As described in Section 6.4.6, the City is actively addressing historically exclusive policies and has set the path for an inclusive city. These efforts are furthered by policies that reinforce fair housing through access to sound and affordable housing consistent with the goals of this housing element update (Goal 5). These goals, policies, and programs will be adopted in association with the General Plan update, the Downtown Specific Plan, or other policy documents, and implemented through approval of individual development proposals.

In addition to direct actions to affirmatively further fair housing, the City demonstrates compliance or intention to comply with fair housing law through the following:

- Although the City implements Density Bonus Law (Gov. Code, §65915.) per recent legislative updates, the City has included Program 2.e to update the Zoning Code to reflect the changes and comply with current State law.
- The City intends to comply with No-Net-Loss (Gov. Code §65863) through identifying a surplus of sites available to meet the City's RHNA allocation. In total, the City's surplus unit capacity is 289, composed of 13 lower-income units, 96 moderate-income units, and 180 above moderate-income units.
- The City complies with the Housing Accountability Act (Gov. Code, § 65589.5) by allowing emergency shelters by right in the Business Park (BP) zone district.
- The City will comply with SB 35 (Gov. Code §65913.4) by establishing a written policy or procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects by March 2023 (Program 4.f).
- The City complies with SB 330 (Gov. Code § 65589.5) with an established pre-application process for development projects.
- The City complies with the California Fair Employment and Housing Act (FEHA) and Federal Fair Housing Act of 1968 by referring fair housing cases to the City's contracted housing rights and tenant protection agency, prohibiting enforcement of racially restrictive covenants still in place, and including Program 5.c in this Housing Element to proactively remove these covenants from property deeds citywide.

6.4.8 Analysis of Sites Inventory for Fair Housing

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 and AB 1304 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity. As shown in Figure VI-4, all of South Pasadena is designated as a highest opportunity area, though access to opportunity varies slightly throughout the community as identified in this assessment of fair housing.

The locations of South Pasadena's proposed housing opportunity sites are not anticipated to contribute to the reinforcement or worsening of any fair housing issues. (A full listing and descriptions of South Pasadena's housing sites are contained in Tables VI-44, VI-50 and Appendix A, Sites Exhibits.) All census tracts within South Pasadena feature at least one larger housing opportunity site (Figure A-1 in Appendix A), with some degree of concentration as mixed-use developments in central areas that feature access to jobs, transit, and schools, as well as higher levels of large vacant or underutilized parcels. Although the moderate concentration of housing opportunity sites in central areas of South Pasadena could be perceived as less equitable than a more even or purely random distribution of housing sites, this alternative approach could serve to worsen fair housing issues by placing new homes further from access to transit, jobs, educational opportunity, and walkable neighborhoods. Additionally, attempting to place housing opportunity sites in areas without larger vacant or underutilized parcels would likely involve more displacement of existing residents and could negatively impact the ability of sites to be feasibly redeveloped within the horizon year of the Housing Element.

In an effort to ensure that new lower-income housing is not disproportionately located in areas with more limited access to resources or concentrated in a way that results in income segregation, the City has identified sites with potential for mixed-income development on all but 5 sites that have been identified for lower-income housing to affirmatively further fair housing through mixed-income development.

Mixed-income sites have the benefit of integrating a variety of housing types and sizes at a range of prices to provide opportunities, regardless of income, for households to have the same access to resources offered in the development. Additionally, the City has identified Program 3.k to promote construction of ADUs in high resource areas and areas with lower density zoning to facilitate more affordable units in those neighborhoods. This multi-pronged approach has been taken to promote integration of income groups in all neighborhoods and combat fair housing issues associated with income distribution.

In addition to the development potential of the sites identified in the inventory, the City adopted an Inclusionary Housing ordinance in May 2021, as discussed in Section 6.6.1 of this Housing Element, to promote construction of affordable units in the city. As the ordinance is relatively new, there have not yet been opportunities to assess its effectiveness in increasing the supply of affordable housing, particularly in higher resource areas. However, the City has included Program 2.m to revise the ordinance to 15% inclusionary set-aside to support project feasibility and Program 2.i to monitor the number of units approved and built as a result of the ordinance and recommend revisions, as needed, to increase effectiveness in achieving the City's goals.

Table VI-32B presents the number of units by income group and location within census tracts in the City, and the existing conditions of each tract as they relate to indicators of fair housing, to assess the location and impact of sites by all income groups on existing patterns and conditions. Sites with capacity for all income categories have been identified in all tracts, with a relatively even distribution across tracts, to facilitate mixed-income and to disperse new housing throughout the city and combat any potential for isolation of housing for any income group. For example, tract 4806.00, which encompasses the area north of Mission Street and Arroyo Drive, includes approximately 28 percent of the total lower-income capacity, 25 percent of the moderate-income capacity, and 26 percent of

the above moderate-income capacity. The only exception to this is in tract 4807.03, located in the central and southwestern portions of the city, which has a lower proportion of above moderate-income units (14 percent) than lower- and moderate-income units (28 percent and 24 percent, respectively).

As seen in Table VI-32B, census tract 4807.02, located in the southwest corner of the city, has the highest median income range and lowest poverty rate, though not the lowest ratio of low-to-moderate-income households. This area also has the highest rate of non-White households and includes predominantly single-family housing. In this tract, the City has identified capacity for 168 lower-income units and 53 moderate-income units, in addition to 116 above moderate-income units, in an effort to reduce the concentration of affluence through income-integrated development, therefore promoting housing mobility opportunities for lower- and moderate-income households. However, this tract also has the lowest jobs proximity index score in the city, so a larger share of lower-income units have been identified in neighborhoods with higher scores, and thus closer proximity to transit, jobs, and services.

Census tract 4806.00 has capacity for 286 lower-income units, 92 moderate-income units, and 137 above moderate-income units. In this tract, the current median income ranges from $74,107, which is considered low-income, to $117,955, which is considered above moderate-income, indicating relatively strong income-integration already. This tract has the highest overcrowding rate and the second highest poverty rate in the city, both of which the City aims to alleviate through the addition of 28 percent of the total lower-income capacity to reduce displacement risk through additional housing opportunities. While this tract has the highest environmental score, indicating the poorest conditions, the score is still in the 34th percentile, indicating strong conditions compared to other areas of the state. However, to prevent concentration of lower-income households in this area, the sites inventory facilitates maintained income-integration. Further, the City has identified Program 1.e to improve environmental conditions to affirmatively further fair housing.

Similar existing median incomes, poverty rates, jobs access, renter overpayment, and proportion of non-white residents exist in tract 4805.00, located south of Mission Street on the eastern side of the city, as compared to tract 4806.00. A balanced proportion of units has also been identified here, including 167 lower-income units (16 percent of total capacity), 64 moderate-income units (18 percent of total capacity), and 69 above moderate-income units (13 percent of total capacity), with the intent of resulting in the same benefits as identified for tract 4806.00.

Tracts 4807.03 and 4807.04, located adjacent to each other in the center of the city, south of Mission Street, have similar demographic characteristics, jobs proximity, and homeowner overpayment. However, in tract 4807.04 there are significantly higher poverty and renter overpayment rates, resulting in increased displacement risk. To reduce this concentration of poverty and combat isolation of this income group, a larger share of lower-income unit capacity has been identified in tract 4807.03, and other areas of the city, and in areas with greater access to jobs.

In addition to the impact on existing characteristics, Figures VI-24 through VI-31 compare the number of units by income category to citywide indicators of fair housing for a comprehensive comparison of how increased residential capacity and approved projects will influence existing patterns.

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Table VI-32B
DISTRIBUTION OF RHNA CAPACITY BY CENSUS TRACT

CENSUS TRACT	EXISTING HOUSEHOLDS	RHNA CAPACITY			AFFH INDICATORS											
					SEGREGATION/INTEGRATION					ACCESS TO OPPORTUNITY			DISPLACEMENT RISK		
		LOWER	MODERATE	ABOVE MODERATE	MEDIAN INCOME	POVERTY RATE	LOW-TO-MODERATE INCOME	NON-WHITE POPULATION	DISABILITY RATE	RESOURCE DESIGNATION	JOBS PROXIMITY INDEX	CALENVIROSCREEN SCORE	OVERCROWDING RATE	RENTER OVERPAYMENT RATE	HOMEOWNER OVERPAYMENT RATE
4805.00	2095	167	64	69	$85,962 - $133,750	7.6%	19.1%	44.1% - 55.4%	11.1%	Highest	47 - 63	9.97	1.19	38.3	51.1
4806.00	3344	286	92	137	$74,107 - $117,955	9.1%	32.8%	49.4% - 64.1%	8.0%	Highest	55 - 78	34.04	6.16	39.8	30.2
4807.02	1724	168	53	116	$136,771 - $197,000	2.5%	34.2%	67.6% - 74.76%	6.5%	Highest	25	9.51	3.25	36.9	28.4
4807.03	1329	291	86	74	$86,442 - $129,427	3.9%	22.6%	54.1% - 66.8%	7.0%	Highest	39 - 53	14.44	1.81	20.7	38.7
4807.04	1931	124	68	124	$80,996 - $133,523	12.7%	36.7%	61.3% - 70.9%	5.6%	Highest	43 - 51	30.09	4.76	36.4	39.3

Sources: 2015-2019 ACS; Esri, 2018; TCAC/HCD 2021; HUD, 2020; OEHHA, 2021; CHHS, 2022

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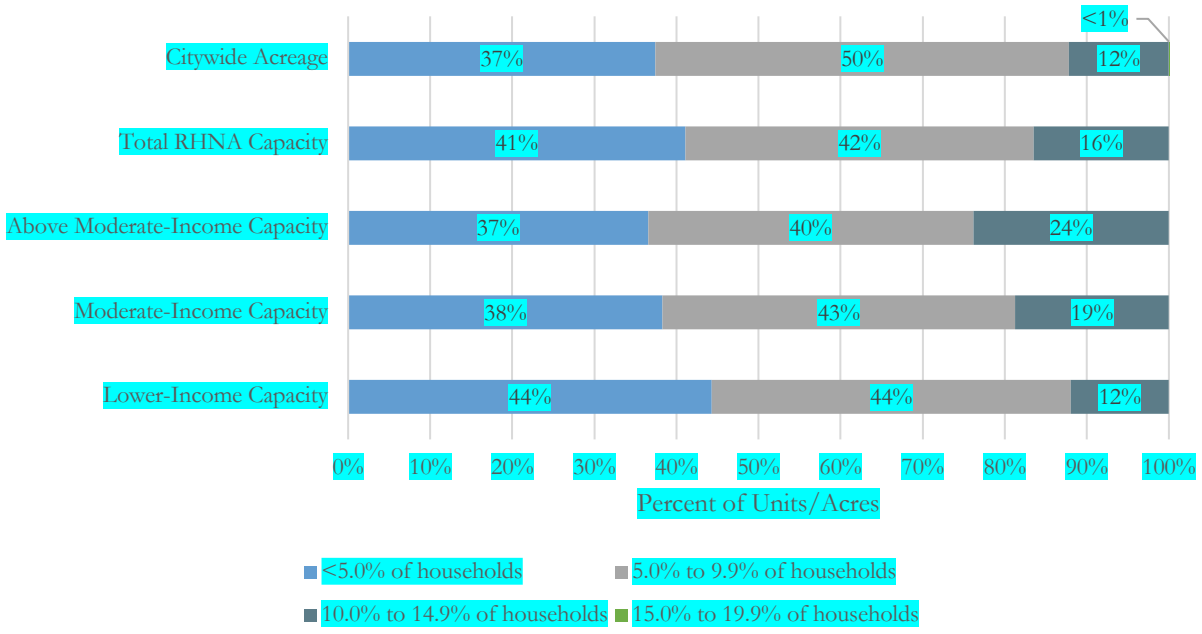
Potential Effects on Patterns of Integration and Segregation

Income

The locations of South Pasadena's housing opportunity sites are not anticipated to reinforce or exacerbate patterns of segregation and integration, whether with respect to race or economic status. As shown in Figure VI-24, South Pasadena has relatively low rates of poverty, with approximately 87 percent of the city's geographical area having a poverty rate of less than 10 percent. While poverty rates are slightly higher in the central portion of the city south of Mission Street (Figure VI-6), housing opportunity sites are located across South Pasadena in a distribution that closely reflects the rate of poverty in the city, with approximately 16 percent of the projected RHNA capacity located in areas with a poverty rate of greater than 10 percent, compared to 12 percent of the city's land falling into this category. Additionally, in this neighborhood with slightly higher poverty rates, the City has identified mixed-income sites to meet the need of existing and future lower-income areas while also alleviating concentration of lower-income households by integrating moderate- and above moderate-income units.

Approximately 88 percent of lower-income units are projected in neighborhoods with fewer than 10 percent of households below the poverty line, ensuring that future lower-income units are not concentrated in areas of higher poverty rates, thus affirmatively furthering fair housing by facilitating housing mobility to areas of affluence. The few sites for lower-income units identified in an area with a higher poverty rate are all located along major transit corridors, as shown in Figures A-1.a through A-1.g, thus providing the best possible access to transit, direct access to employment opportunities, and other resources. As Figure VI-24 demonstrates, although there are modest differences in poverty rates throughout South Pasadena, housing opportunity sites are distributed in such a manner as to promote mixed-income communities and encourage lower-income units in areas of affluence and moderate and above-moderate units in areas with slightly lower median incomes, thereby serving to dilute any potential effects with respect to concentration of poverty. As stated previously, the identification of mixed-income sites and Program 3.f, in addition to other programs, serves to address income patterns through integration of a variety of housing types to meet a range of income needs in all neighborhoods where sites have been identified. Further, the inclusionary housing requirement will also ensure that new developments serve a variety of household income categories within the same site.

Figure VI-24
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY POVERTY RATES



Source: 2015-2019 ACS; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which more than 16.5 percent of households are below the poverty line.

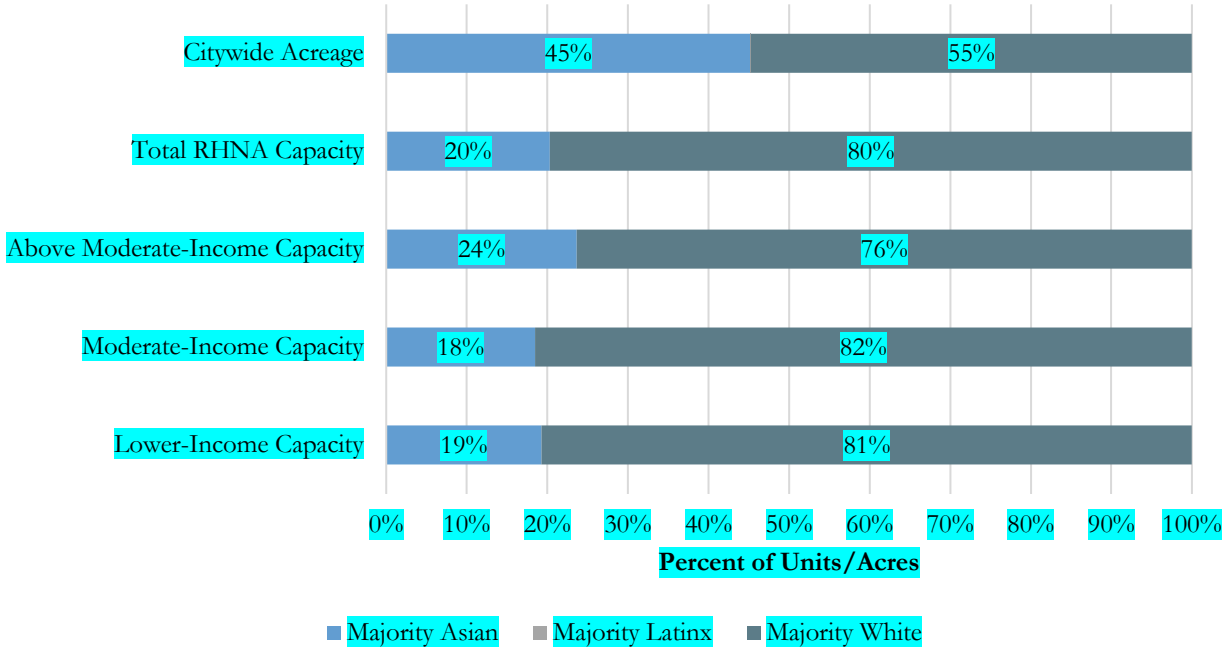
As shown in Figure A-1.e in Appendix A, southwest South Pasadena is dominated by single-family homes and most sites are in the RS zone. While many of these sites have been identified to meet the above moderate-income RHNA, the City has included Program 3.f to facilitate production of ADU resources in this neighborhood and to streamline the permitting process in an effort to increase the supply of lower- and moderate-income opportunities in neighborhoods such as this. The sites identified to meet the RHNA address income patterns through mixed-income opportunities while programs and policies further these efforts by encouraging affordable housing in existing neighborhoods.

Race and Ethnicity

The sites inventory includes housing opportunity sites for all income categories across all of the South Pasadena census tracts, to avoid the potential of reinforcing or exacerbating any patterns of racial segregation. Although population trends in South Pasadena historically had strong patterns of racial disparity, diversity indices within all South Pasadena census tracts are currently holding steady or increasing (Figure VI-12), and no census tracts currently feature racial majority gaps in the "predominant" category (Figure VI-11). Additionally, because there are neither any TCAC identified Areas of High Segregation or Poverty nor any HUD-identified R/ECAPs in South Pasadena (Figure VI-2), the location of the City's housing opportunity sites would not affect any issues relating to these classifications.

While there is a concentration of Asian residents in the southern portion of the city, south of Mission Street (Figure VI-11), other indicators in this area such as quality of schools, median income, and familial status suggest that this population is not negatively isolated and has equal access to economic, educational, and environmental opportunities compared with residents of other areas of the city. As presented in Figure VI-25 the majority of the population identify as Asian in approximately 45 percent of the city, while the majority of residents identify as White in the remaining 55 percent. Approximately 80 percent of the sites inventory is in areas with a population that identified as majority white, which offer quality schools, have higher jobs proximity index scores, and are closer to the resources, services, and amenities of commercial corridors along Fair Oaks Avenue and Mission Street.

Figure VI-25
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RACIAL IDENTIFICATION



Source: 2015-2019 ACS; City of South Pasadena, 2022

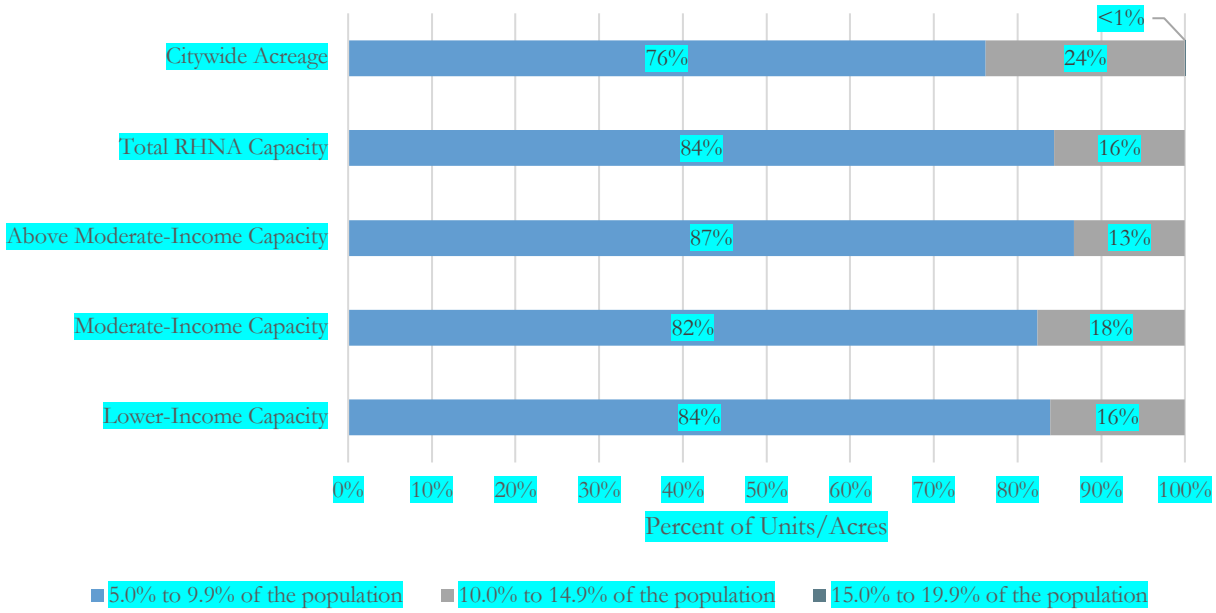
Note: There are no areas in the City of South Pasadena in which more than 14.9 percent of households are below the poverty line.

Disability

Approximately seven percent of South Pasadena's population lives with at least one disability, a rate that is relatively low compared to the region. As shown in Figure VI-26, approximately 84 percent of the total RHNA capacity identified in the sites inventory is in areas in which 5.0 to 9.9 percent of residents have a disability, closely reflecting the distribution of land in South Pasadena by disability rate. Locating units affordable to lower- and moderate-income residents near and along commercial corridors will help to improve access for, and accommodate the needs of, persons living with disabilities, who benefit from close access to services and amenities as well as proximity to transit.

Additionally, mixed housing types viable in the high-density and mixed-use zones can help accommodate the needs of residents living with disabilities by integrating services or amenities on-site.

Figure VI-26
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY DISABILITY RATE



Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 5.0 percent or more than 14.9 percent of the population has a disability.

Potential Effects on Access to Opportunity

With respect to access to opportunity, the locations of South Pasadena's housing opportunity sites would serve to maximize resident access to economic and educational opportunity. As shown in Figure VI-4, the entirety of South Pasadena is identified as a Highest Resource area, indicating high levels of opportunity throughout the City. Additionally, regional place- and people-based indices indicate that South Pasadena features a high level of opportunity in all census tracts.

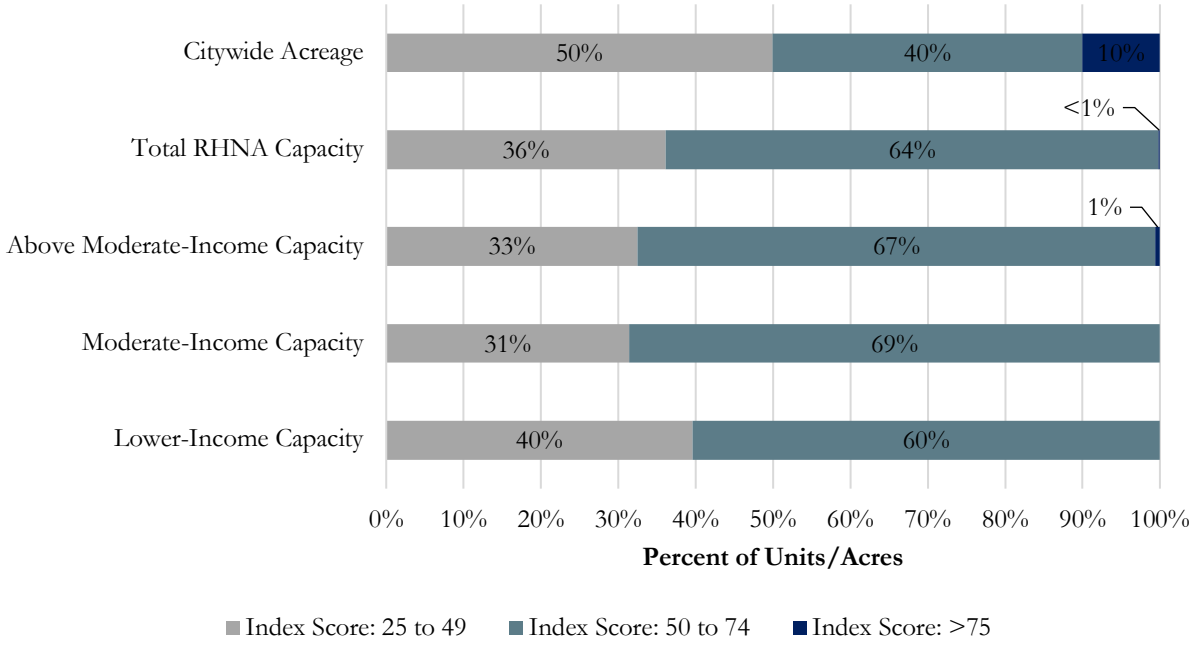
Jobs and Transit Proximity

Based on the data presented in Figure VI-18, the majority of South Pasadena's housing opportunity sites would feature moderate to good access to jobs, and would also have good access to bus stops along Fair Oaks Avenue, as well as the South Pasadena Metro L Line light rail station. As shown in Figure VI-27, approximately 64 percent of the RHNA capacity is located in areas scoring 50 or above for job proximity, compared to 50 percent of the citywide acreage. Approximately 60 percent of lower-income units and 69 percent of moderate-income units are located in areas scoring 50 or above, suggesting that these units will offer strong access to employment opportunities. Sites identified in the Garfield Park and central South Pasadena neighborhoods, where there are the highest jobs

proximity index scores (Figure VI-18), include lower-income and mixed-income sites. These neighborhoods have the strongest access to jobs and transit and will therefore promote mobility opportunities for new residents. The identification of sites is expected to support housing opportunities for current and future South Pasadena residents near jobs and transit to support a strong economy and provide economic mobility opportunities, therefore positively impacting the neighborhood.

While not all units are planned in the areas of highest job proximity, the remaining units offer mobility opportunities for households that choose to live further from existing job opportunities. The location of several lower-income sites along the Fair Oaks Avenue and Mission Street corridors will provide close proximity to employment opportunities in these areas as well as the regular transit stops located along both of these thoroughfares.

Figure VI-27
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH JOB PROXIMITY INDEX SCORE



Source: 2014-2017 HUD; City of South Pasadena, 2022
Note: There are no areas in the City of South Pasadena in which fewer the jobs proximity index score is less than 25.

Educational Opportunities

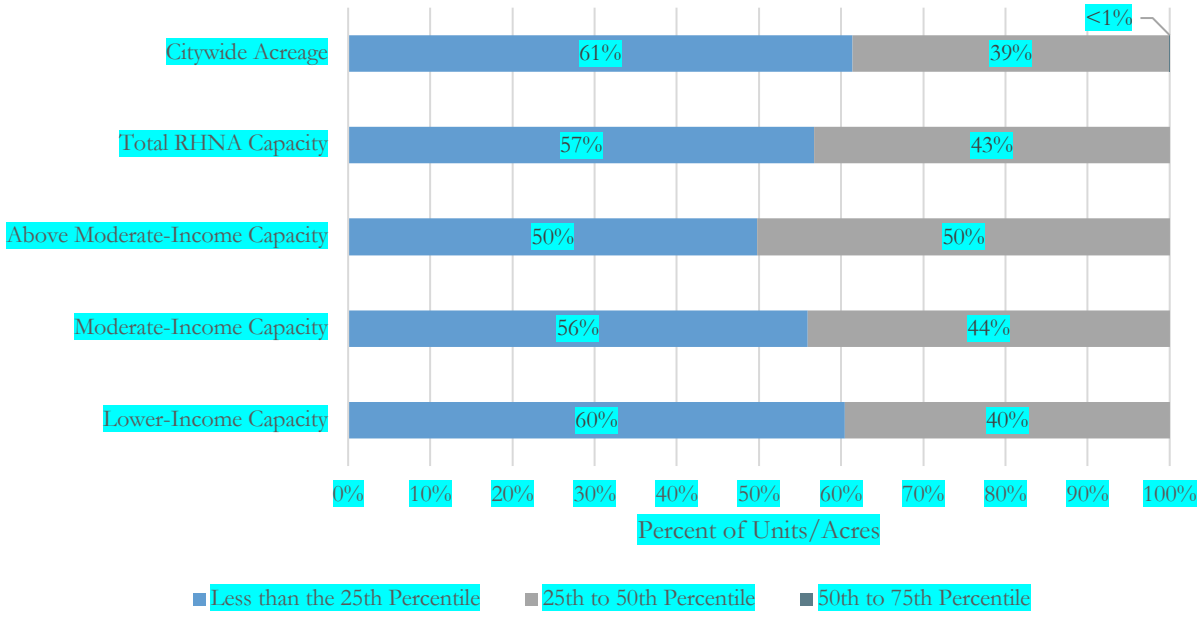
As discussed in Section 6.4.4 (Access to Opportunity), all public schools in the City of South Pasadena score in the 95th percentile or higher compared to the rest of the state. Additionally, Figures VI-15 through VI-17 demonstrate that nearly all parcels in the city are located within a mile of an elementary school and that the middle and high schools are centrally located. Given the location, access, and proficiency of schools in South Pasadena, the sites identified in this Housing Element to

meet the RHNA will provide housing opportunities for new and existing households, including lower-income households, near good schools. As school quality is often tied to housing based on both public and private investments, the identification of sites in central South Pasadena neighborhoods for mixed-income housing will facilitate this investment that is typically associated with higher income areas and single-family neighborhoods. Therefore, the sites inventory will continue to support strong school opportunities for all residents within the area schools serve. TCAC and HCD have identified all of South Pasadena as scoring in the 82nd percentile or higher, further supporting that the location of sites will not limit access to proficient schools for any socioeconomic group.

Environmental Health

Despite historic contamination of drinking water sources, all census tracts in South Pasadena score between the 9th and 34th percentiles for OEHHA's assessment of environmental pollution, likely as a result of extensive efforts to mitigate past contamination in the San Gabriel Valley. As shown in Figure VI-28, 57 percent of the unit capacity to meet the City's RHNA is located in areas that score below the 25th percentile, or the best environmental conditions. This includes 60 percent of lower-income units and 56 percent of moderate-income units. Though 43 percent of the RHNA capacity is located in areas with slightly higher scores, the generally low scores throughout the City indicate that all residents across the City will have similar access to healthy environmental conditions. The distribution of units at each affordability level will not create a discrepancy in access to positive environmental conditions.

Figure VI-28
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CALENVIROSCREEN PERCENTILE



Source: CalEnviroScreen 4.0, 2021; City of South Pasadena, 2022

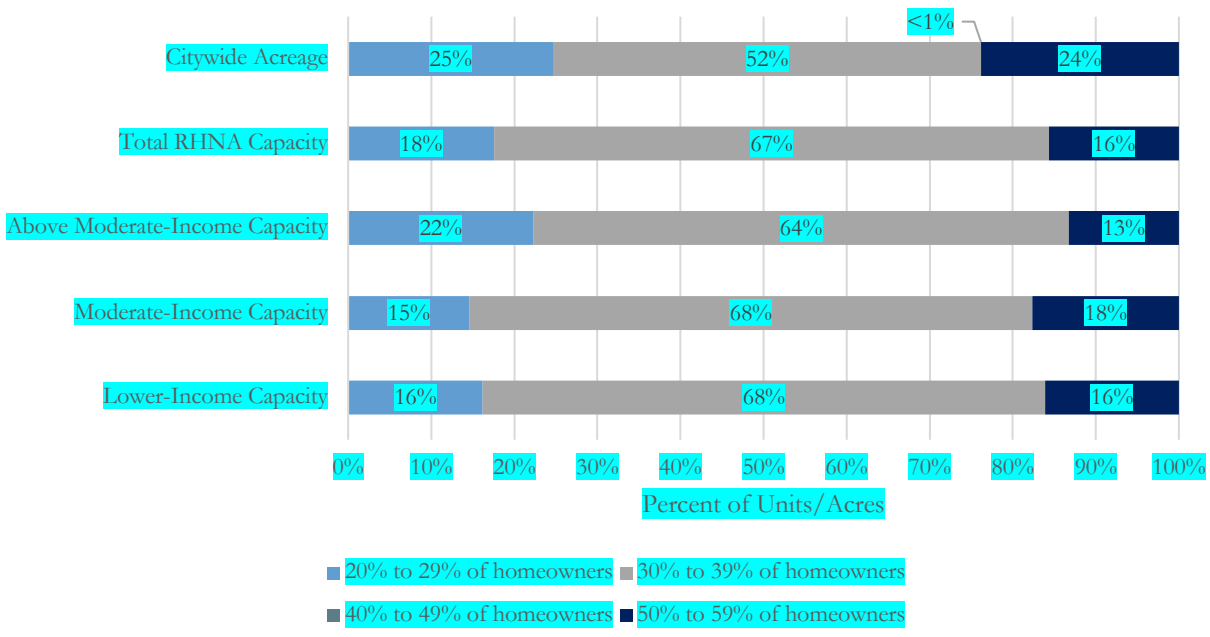
Note: There are no areas in the City of South Pasadena that score above the 34th percentile.

Potential Effects on Disproportionate Housing Need

Overpayment

While overpayment rates are lower in South Pasadena than many nearby jurisdictions, as shown in Figures VI-20 and VI-22, owners and renters throughout the city, and the greater Los Angeles area, are overpaying for housing because of rapidly increasing housing costs that outpace wage increases. With a large supply of lower- and moderate-income households in the central portions of South Pasadena with good access to schools, transit, and commercial districts, the sites inventory guides new housing toward opportunities to alleviate pressure for households to relocate to less accessible and/or less affordable areas of the City due to housing costs. As shown in Figure VI-29, the allocation of the total RHNA capacity closely reflects the patterns of overpayment among homeowners. A greater percentage of the units to meet the lower- and moderate-income RHNA have been identified on sites located in areas in which more than 30 percent of homeowners are overpaying for housing, therefore reducing displacement risk for these households by expanding the supply where there is greatest need. In contrast, there is a larger share of above moderate-income units (22 percent) in the southwestern portion of the city where overpayment is lower, likely due to the high median income. Approximately 16 percent of lower-income units have also been identified in areas of lower homeowner overpayment rates, including along Monterey Road and Pasadena Avenue, to encourage mixed-income neighborhoods and facilitate housing mobility opportunities for these households.

Figure VI-29
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF HOMEOWNER OVERPAYMENT

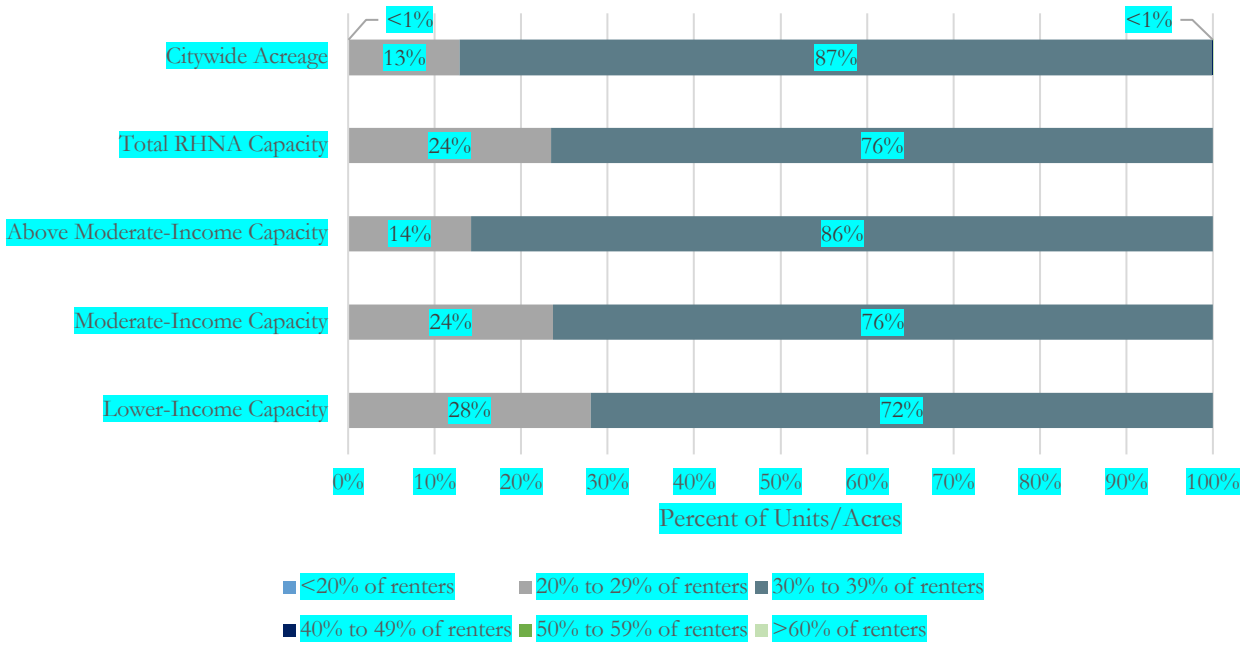


Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 20 percent or more than 59 percent of homeowners are overpaying for housing.

Renter overpayment in South Pasadena is notably lower than in surrounding jurisdictions, as seen in Figure VI-21. The rate of overpayment among renters ranges from 20 to 39 percent throughout the City (Figure VI-30). As with homeowner overpayment, the distribution of the total RHNA capacity by renter overpayment rates closely mirrors the citywide rates, with approximately 24 percent of units in areas in which 20 to 29 percent of renters are cost burdened and 76 percent in areas in which 30 to 39 percent of renters are cost burdened. Relatively low overpayment rates among renters likely reflect a barrier to entry to the South Pasadena housing market for lower- and moderate-income households, given the shortage of affordable rental housing. As such, the plan to build more rental housing specifically for these income groups will increase mobility opportunities while minimizing displacement risk due to overpayment.

Figure VI-30
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH RATE OF RENTER OVERPAYMENT



Source: 2015-2019 ACS; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which fewer than 20 percent or more than 39 percent of homeowners are overpaying for housing.

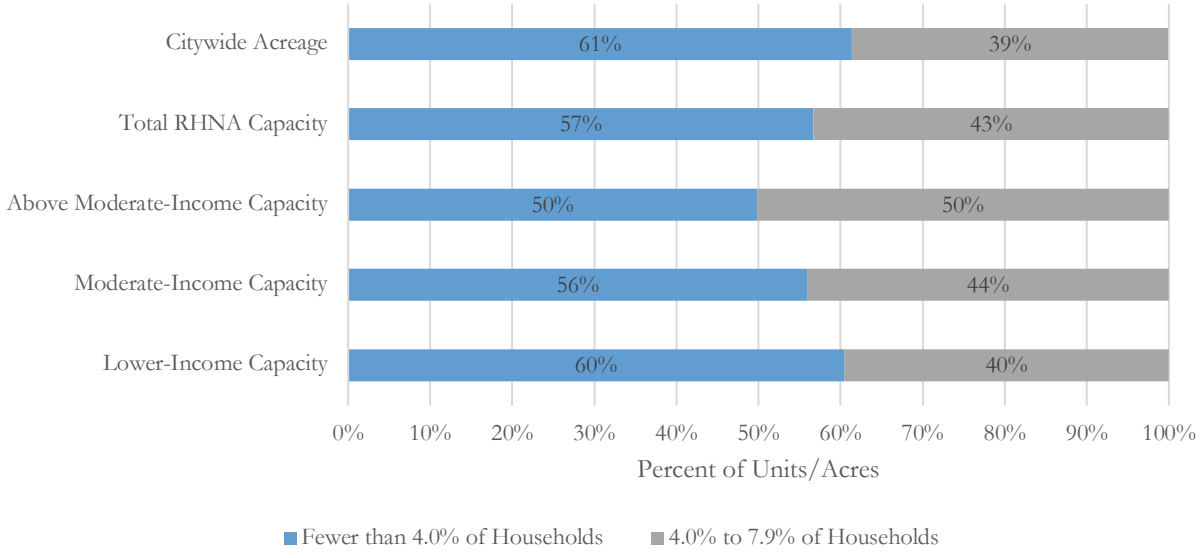
Typically, above-moderate income ownership units are unaffordable to lower- and moderate-income households in South Pasadena, although inclusionary units in ownership projects may offer those opportunities for moderate-income households in the coming years. Sites for new units have been identified across all geographic areas of the City where a range of overpayment levels exist for both owners and renters. The overall intent is to reduce risk of displacement due to overpayment for all South Pasadena residents.

Overcrowding

As discussed previously, overcrowding is not a significant problem in South Pasadena, with rates below eight percent throughout the City, as shown in Figures VI-19 and VI-20. The highest rate of overcrowding occurs in the area between Fair Oaks Avenue and the eastern edge of the Monterey Hills neighborhood, as well as in the northern areas of the City. However, even in these areas, overcrowded households account for less than eight percent of total households. This, combined with the fact that South Pasadena's housing opportunity sites are located across all City census tracts, demonstrates that patterns of planned new housing development would not serve to exacerbate existing overcrowding issues and may actually serve to reverse them.

The distribution of moderate income and above-moderate income units closely follows overcrowding patterns, with 56 percent of moderate-income unit capacity and 50 percent of above-moderate income unit capacity in areas where fewer than four percent of households are overcrowded. Approximately 60 percent of lower-income units are located in these areas, with the remaining 40 percent along Mission Street and adjacent to the Arroyo Seco Golf Course, where overcrowding is currently slightly higher. Given the low rates of overcrowding throughout the City, the identification of sites in all census tracts will help to alleviate overcrowding through increased mobility opportunities and a larger supply of lower- and moderate-income housing units in general, particularly near commercial corridors. Additionally, the construction of more above-moderate income units will expand the housing stock, offering new market-rate housing opportunities to potentially reduce displacement and overcrowding for these households as well.

Figure VI-31
SITES INVENTORY UNIT DISTRIBUTION COMPARED WITH CITY RATE OF OVERCROWDING



Source: CHHS, 2020; City of South Pasadena, 2022

Note: There are no areas in the City of South Pasadena in which more than 6.2 percent of households are overcrowded.

Altogether, these various considerations and analyses indicate that South Pasadena's planned housing opportunity sites would not only avoid exacerbating fair housing issues, but would actually serve to improve fair housing outcomes by: (1) avoiding concentrating new housing and affordable housing in areas characterized by economic/racial segregation; (2) placing new housing and affordable housing in areas with access to jobs, transit, and educational opportunity; and (3) allowing more housing in South Pasadena in general, thereby giving additional families access to the City's extensive high-resource areas.

6.4.9 Contributing Factors to Fair Housing Issues

The overall housing shortage in the Los Angeles region, and particularly the shortage of subsidized, affordable housing units with a range of sizes to meet the needs of all persons, is a contributing fair housing factor for South Pasadena and for all its surrounding jurisdictions. South Pasadena is part of a bigger housing market for above-moderate and for moderate and lower income households. The Housing Plan in Section 6.8 addresses South Pasadena's obligation to contribute its fair share toward addressing the regional shortage by identifying the local factors that contribute toward it.

Based on this assessment of fair housing, the priority issue that has emerged for South Pasadena is the lack of housing for lower- and moderate-income households, and the historic denial of access to the black community and others due to past-century racist practices. Addressing the continuing effects of exclusionary housing policies has been identified as the highest priority action to affirmatively further fair housing in South Pasadena.

It should also be noted that high rental rates and sales prices limit local housing options for seniors and individuals living with a disability, resulting in housing pressures for these vulnerable segments of the community. Housing for these groups is also of high importance and several strategies are identified in Section 6.8 to support them.

Prioritized contributing factors are **bolded** in Table VI-33 and associated actions to meaningfully affirmatively further fair housing related to these factors are ***bolded and italicized***.

Table VI-33
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Displacement/exclusion of lower-income residents and overpayment for housing by renters and homeowners	**Housing shortages in the City** **Lack of affordable and assisted housing units** Unaffordable rents and home prices Cost of rehabilitation or repair Shortage of sites that could be feasibly redeveloped **Currently limited partnerships with affordable housing developers**	Program 1.c - Housing Rehabilitation and Code Enforcement Program 2.a - Planning Assistance and Permit Processing Program 2.b - Affordable Housing Production Program 2.c - CalHome Program Program 2.d - Section 8 Rental Assistance Program 2.e - Density Bonus Program 2.f - Homeless Services ***Program 2.i Inclusionary Housing Regulations – Monitor for Effectiveness*** ~~Program 2.k - Affordable Housing Overlay Zone~~ Program 3.a - Rezone and Redesignate Sites to Meet RHNA Program 3.c – Replacement of Lost Units from Residential Demolitions ***Program 3.f - Allow and Facilitate ADUs*** Program 3.g - Monitor ADU Production ***Program 3.k - ADU Education, Promotion, and Homeowner Outreach*** Program 4.a - Land Use Controls – Emergency Shelters Program 4.b - Land Use Controls – Transitional and Supportive Housing ***Program 5.a - Fair Housing Education, Outreach, and Services***
Modest overcrowding in central and northern areas of the City	Availability of affordable units in a range of sizes	Program 2.n – Citywide Height Limit Ballot Initiative Program 3.b - Mixed-Use Developments and Adaptive Re-Use Program 3.d - Parcel Assemblage Program 3.f - Allow and Facilitate ADUs ***Program 5.b - Encouraging a Variety of Housing Types***

AFH IDENTIFIED FAIR HOUSING ISSUE	CONTRIBUTING FACTORS	MEANINGFUL ACTION
Displacement risk due to repair and rehabilitation need to maintain habitability and/or lack of accessibility for seniors and persons with disabilities	Aging housing stock **Cost of rehabilitation or repair** **Cost of retrofitting existing properties** **Shortage of accessible units** Need for higher levels of new, ADA-compliant development	Program 1.b - Housing Acquisition ***Program 1.c - Housing Rehabilitation and Code Enforcement*** Program 2.g - Senior Housing Program 3.f - Allow and Facilitate ADUs ***Program 4.d - ADA Accessibility Standards*** Program 4.e - Universal Design
Potential housing discrimination against protected classes	**Existing racially restrictive covenants, though not enforced** **Historic discriminatory practices** Lack of education and mediation services for renters, buyers, property owners, and real estate professionals	Program 4.d - ADA Accessibility Standards ***Program 5.a - Fair Housing Education, Outreach, and Services*** ***Program 5.c - Removal of Racially Restrictive Covenants from Property Deeds Citywide***

6.5 HOUSING CONSTRAINTS

Market conditions, as well as governmental programs and regulations, affect the provision of adequate and affordable housing. Housing Element law requires an assessment of potential and actual governmental and non-governmental constraints affecting the development of new housing and the maintenance of existing units for all income levels. Potential market, governmental, and environmental constraints that contribute to housing development costs in South Pasadena are addressed herein.

6.5.1 Market Constraints

Construction Costs

Construction costs can constitute a constraint to affordable housing in the City that is largely outside of the City's control. Labor and materials costs have a direct impact as they comprise the main component of housing costs. If labor or material costs increase substantially, the cost of construction in the City could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and rehabilitation of existing housing.

The cost of construction is influenced by market demand and market-based changes in the cost of materials, which may also be affected by Building Code requirements. The cost of construction depends on the type of unit being built and on the quality of the product being produced. Labor-saving materials and construction techniques are available but they tend to reduce the quality of the finished product. The type of product largely determines the cost of construction. The cost of labor is based on a number of factors, including housing demand, competition for other construction projects, the number of contractors in an area, and whether construction workers are being paid based on union scales. Estimates of construction costs in the Los Angeles region from an online source (Building-Cost.net), published by the Craftsman Book Company, indicate that a typical 2,000-square-foot, wood-frame, single-family residence costs approximately $284,203 total (or approximately $142 per square foot) for labor and materials, not inclusive of land.[20] It is likely that construction costs in the City of South Pasadena would exceed this figure based on the high quality of design standards required by the community. In March 2020, the City estimated that the typical cost of construction for multifamily housing was $112.76 per square foot[21], although this figure is likely to have increased in the past 18 months. Reducing amenities and the quality of building materials, while maintaining the minimum requirements for health, safety, and performance, would reduce costs but would bring the developer a lower sales price.

The constraint of construction costs can be mitigated to some extent through economies of scale, reducing the overall cost per unit when a project contains a higher number of units. Components of the housing plan that increase unit density and facilitate state density bonuses in conjunction with the provision of affordable housing directly address the market-based constraint of housing cost.

[20] This estimate includes a two-car garage and forced air heating.
[21] M. Lin, personal communication, March 31, 2020.

Another component of construction cost is the cost associated with infrastructure improvements to serve the new development. New residential development projects are required to provide on-site water and sewer lateral connections to existing City mains and to construct new storm drain improvements, including National Pollutant Discharge Elimination System (NPDES) required components, and are factored into the usual cost of construction. In addition, the City's Low Impact Development ordinance required by the regional water quality control board requires all developments of one acre or more to provide for subterranean drainage of stormwater, which is more expensive than connection to a storm drain.

Existing City services, including water, sewer, and storm drain facilities, are available to serve new housing development. The Program Environmental Impact Report being prepared for the Housing Element and the rest of the General Plan Update will further analyze the sufficiency of City services to address all of the units planned for in the Housing Element. Dry utilities (electrical and internet service) are also available to serve all the sites in the inventory.

In January 2015, the City Council adopted new development impact fees for new water and sewer connections for new developments. Previously, the common practice was for the cost of new connections to be absorbed by the service charges paid by existing South Pasadena utility customers, but changes in state law no longer allow this former practice to be conducted. Chapter 16B of the City's Municipal Code provides the legal basis for the imposition of development impact fees on development, describes which developments are exempt from the fee, and details how the fee should be calculated. When the Council adopted the connection fees in 2015, the cost for a new equivalent meter size of 5/8 by 3/4 inches—the most common household water connection—was $7,916. New sewer connection fees cost $2,094 per dwelling unit. California Government Code Section 66000 et seq. allows local jurisdictions, like South Pasadena, to charge water connection fees and South Pasadena's fees are similar to surrounding jurisdictions, like Pasadena to the north. These connection fees do not place a constraint on new housing development in South Pasadena.

Some of the vacant single-family parcels on the inventory are located in hillside areas, where an additional construction cost is incurred for required grading in association with stepping of the pad and providing retaining walls. There are a few hillside properties that may be appropriate for multifamily housing and the need to provide for multi-stepped pads on those sites could constitute a constraint.

Land Costs

The price of land is a key component of the total housing cost, and land prices in South Pasadena are high, and continue to increase. According to a survey of vacant residential land sales on Zillow in September 2021, vacant land costs range from $34-$118 per square foot in the City, depending on location, development capacity of the land, and whether planning approval has been approved for the project. This is not substantially changed as compared with $40-$100 per square foot documented in the 2013-2021 Housing Element. Over the past housing element period, most of the new housing units have been single-family homes and ADUs, with a few smaller multi-family projects completed. Many of these new homes were built in vacant, hillside areas, or replaced existing structures. The policies of this housing element focus on different land resources throughout the city, with an expectation of replacing non-residential uses with multi-family or mixed-use residential development. This will undoubtedly have an effect on land prices as the market adjusts to the changes in opportunity for land in different parts of the city.

Mortgage Financing

National policies and economic conditions determine interest rates, and there is little that local governments can do to affect these rates. First-time homebuyers are the group impacted the most by financing requirements. As of December 2020, interest rates for mortgages in South Pasadena generally ranged from 2 percent for a fixed-rate 15-year loan to 2.7 percent for a 7/6-month adjustable-rate mortgage. With interest rates remaining low for an extended period, sales prices have steadily increased, which, along with changes in lending practices in the last 10 years, has created a constraint to housing for some potential purchasers. Another more critical impediment to homeownership is the ability of potential buyers to fulfill down payment requirements, and the ability of buyers to receive a favorable credit rating. A conventional home loan typically requires 20 percent of the sale price as a down payment, which is the largest constraint to first-time homebuyers. This indicates a need for flexible loan programs and a method to bridge the gap between the down payment required and a potential homeowner's available funds. The availability of financing for developers under current economic conditions also poses a constraint on development that is outside of the City's control. Historically, jurisdictions could offer interest rate write-downs to extend home purchasing opportunities to a broader economic segment of the population through the use of state and federal financing programs, when available.

6.5.2 Governmental Constraints

Housing affordability is also affected by the actions and policies through which the City and State can have an impact on the production of housing. Land use controls, site improvement requirements, California building codes, fees, and other local programs intended to improve the overall quality of housing may serve as constraints to the development of affordable housing.

General Plan Land Use Element and the Mission Street Specific Plan

The South Pasadena General Plan Land Use Element sets forth the City's policies for guiding local development by establishing the amount and distribution of land to be allocated for different uses within the City. The current (1998) General Plan Land Use Element acts as a constraint on housing production through limitations that preclude mixed-use and higher density multi-family housing. The comprehensive revision of the General Plan and preparation of a new Downtown Specific Plan that will replace the Mission Street Specific Plan will play a major role in addressing this constraint. The draft General Plan presents a community vision for South Pasadena through 2040 that aligns with the programs in this housing element. Adoption is anticipated at the same time as Housing Element adoption.

South Pasadena's current General Plan residential land use densities are shown in Table VI-34.

Table VI-34
GENERAL PLAN RESIDENTIAL LAND USE CATEGORIES

RESIDENTIAL LAND USE DESIGNATIONS	DENSITY (DWELLING UNITS PER ACRE)
Estate & Very Low-Density Residential	1 – 3.5
Low-Density Residential	3.5 – 6
Medium-Density Residential	6 – 14
High-Density Residential	14 – 24
Altos De Monterey (Overlay Zone)	1 unit per lot

Source: Land Use & Community Design Chapter, *South Pasadena General Plan*, October 1998

The new plans anticipated to be adopted in 2022 will allow a range of densities, including mixed-use zoning with 30-70 dwelling units per acre.

Residential Zoning Regulations

Residential site development standards are summarized by zoning district in Table VI-35. The City maintains the current Zoning Code with zoning and development standards on the City website.

Table VI-35
RESIDENTIAL SITE DEVELOPMENT STANDARDS BY ZONING DISTRICT

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Minimum lot size	***Minimum area and width for new parcels.***				
Area	12,500 sf	10,000 sf	10,000 sf	10,000 sf	As shown on Final Tract Map 25588, except for mergers and lot line adjustments, provided that such actions shall not cause any significant gain or loss in the area of the tract. The subdivision of any existing lot is prohibited.
Width	75 ft; 85 ft for a corner lot	50 ft; 60 ft for a corner lot		60 ft; 80 ft for a corner lot	Regular lots: 30 ft. Flag lot "pole": frontage width may be 25 feet for parcels 306 and 307 to accommodate a 10-foot wide path parallel to the flag lot stem.
Residential density	***Maximum number of dwelling units allowed in a project. The actual number of units allowed will be determined by the City through subdivision or land use permit approval, as applicable.***				
Allowable density	1 - 3.5 du/acre	3.51 - 6 du/acre	6.1 - 14 du/acre	14.1- 24 du/acre	1 du/lot
Minimum density allowed	Each legal parcel in a residential zoning district will be allowed one single-family dwelling regardless of lot area; parcels in zoning districts that allow single-family and multifamily residential districts may also be allowed an accessory dwelling unit in compliance with Section 36.350.200 (Residential Uses - Accessory Dwelling Units).				
Minimum lot area/ multifamily unit	N.A.		3,200 - 7,300 sf	1,900 - 3,200 sf	N.A.
Setbacks	***Minimum and, where noted, maximum setbacks required. See Section 36.300.030 for setback measurement, allowed projections into setbacks, and exceptions to setbacks.***				
Front	25% of lot depth, with a minimum of 25 ft, and a maximum requirement of 35 ft		20 ft	20 ft; 85 ft from street centerline on Huntington Drive	See Table 2-8 of South Pasadena Municipal Code Division 36.250 (AM Overlay District Setback Requirements). The side setback requirements in the table identify each side (i.e., 15'-5' means 15 ft on one side and 5 ft on the other).
Front exception	If 60 percent or more of the lots on the same block face have structures with front setbacks different from the above, the required front setback shall be the average of the existing front setbacks, provided that no more than 45 feet shall be required in the RE district, and 35 ft shall be required elsewhere.				N.A
Sides, each	10% of lot width	10% of lot width, 4 ft minimum		10 ft	See Table 2-8 of South Pasadena Municipal Code Division 36.250 (AM Overlay District Setback Requirements). The side setback requirements in the table identify each side (i.e., 15'-5' means 15 ft on one side and 5 ft on the other).
Side, street side	20% of lot width, to a maximum requirement of 15 ft			15 ft	
Rear	25 ft		20 ft	15 ft, or 5 ft if abuts an alley.	25 ft
Garage	An attached garage shall be set back a minimum of 10 ft from the front of the main structure				N.A.

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Accessory structures	As required for primary structures, except that: A structure of 120 sf or less may be placed within a required side or rear setback, but not a front setback or in front of the frontmost dwelling unit on the lot; • A detached garage or carport or other accessory residential structure shall be located at least 5 ft from a side and/or rear property line, except if the required side yard setback for the dwelling/s is less than 5 ft, in which case the lesser side yard setback may be used for a detached garage or carport only. Such structures cannot be located in the front setback or in front of the frontmost dwelling unit on the lot; • Accessory structures shall be located at or beyond the required street-facing side yard setback for the dwelling/s, except if the Director determines that a lesser setback can be approved using the Administrative Use Permit process detailed in Section 36.350.170(C)(3)(e); • Private residential recreational facilities shall be located at least 5 ft from a side and/or rear property line and cannot be located in the front setback, or in front of the frontmost dwelling unit on the lot or in the street-facing side setback of a corner lot.				N.A.
Building separation	10 ft between structures on the same site.				
Lot coverage	***Maximum percentage of total lot area that may be covered by structures.***				
	40%		50%	60%	40%
Floor area ratio	***Maximum allowable ratio of building floor area to lot area. See Article 7 (Glossary) for a definition and illustration.***				
Requirement	0.35		0.50	Single-family dwellings - 0.40 Multifamily projects - 0.50	0.35 for main building area for multi-floor structures, maximum
Exception	Each dwelling unit may have an attached or detached garage or carport of up to 500 sf in addition to the above-listed FAR. Any square footage in excess of 500 sf is included in the FAR calculation.				N.A.
Height limit	***Maximum allowable height of structures in other than hillside areas (see Division 36.340 (Hillside Protection) for height limits in hillside areas). See Section 36.300.040 (Height Limits and Exceptions) for height measurement requirements. See also Section 36.350.170 (Residential Uses—Accessory Residential Structures).***				***Maximum height of structures, measured from a point 6 inches above the high point of the existing grade line at the existing, previously set front yard setback line to the highest point of the roof or parapet wall.***
Maximum Height	35 ft			45 ft	Primary Structure: 25 ft Detached Accessory Structure: 15 ft

	Requirement by Zoning District (*)				
Development Feature	**RE**	**RS**	**RM**	**RH**	**AM**
Multiple story exception	No portion of a structure shall encroach through a 45 degree angle projected perpendicularly from the front property line toward the rear property line. See Figure 2-1, page 14. Building height in addition to the above limits may be authorized by the DRB through Design Review (Section 36.410.040) to accommodate dormer windows and/or non-habitable roof structures where appropriate to the architectural style of the dwelling.				N.A.
Open Space	N.A.		As required by Section 36.350.190 (Multifamily Project Standards) and listed below this table		N.A.
Landscaping	As required by Division 36.330 (Landscaping Standards)				As required by Division 36.330 (Landscaping Standards). No impervious surface shall be allowed in a required front or street side setback area, except for a driveway or approved drainage structure. All trees shall comply with the requirements of Ordinance No. 1991.
Parking	As required by Division 36.310 (Parking and Loading) **(see detailed discussion on residential parking requirements below)**				• Dwellings require 3 off-street spaces (2 in a garage or carport), that are a minimum of 10 ft wide by 20 ft long, and entirely located to the rear of the front setback line. • No vehicle, trailer, boat, or component thereof shall be stored on any parking space or driveway, or access thereto, except in a garage or carport, or behind a solid wall or fence that screens the stored object from public view.
Signs	As required by Division 36.320 (Signs)				No more than one commercial sign with a maximum area of 6 square feet shall be displayed on any lot; non-commercial signs are not subject to this limitation.

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021

Note: This table has not yet incorporated any changes that may be required based on the adoption of Senate Bill 9.

Multi-Family Open Space Requirements

The following are the open space requirements for multi-family projects excerpted from SPMC Section 36.350.190.C.

"All multi-family residential projects except duplexes shall provide permanently maintained outdoor open space for each dwelling unit (private space), and for all residents (common space).

1. Area required. Private open space shall be provided at a ratio of 200 square feet per dwelling unit. Common open space shall be provided based on the size of the project, as follows in Table VI-36.

Table VI-36
MULTI-FAMILY COMMON OPEN SPACE

PROJECT SIZE	COMMON OPEN SPACE REQUIRED	PRIVATE OPEN SPACE REQUIRED
3 to 4 units	200 sf	200 sf per unit
5 to 10 units	500 sf	
11 to 30 units	1,000 sf	
31 and more units	2,000 sf	

1. Configuration of open space.
    a. Location on site. Required open space areas:
        i. Shall be located adjacent to the primary entrance;
        ii. Shall be provided as continuous, usable site elements, which shall not include setback areas but may be contiguous to required setbacks; and
        iii. Private open space shall be at the same level as, and immediately accessible from, a kitchen, dining room, family room, master bedroom, or living room within the unit. Variations from these dimensional and locational standards may be allowed where it can be shown that the required private open space meets the intent and purpose of this Section. Provision of private open space shall not reduce the common open space requirements of this Section.
    b. Dimensions. All open space areas shall be of sufficient size to be usable by residents.
        i. Private open space areas shall have a minimum dimension of eight feet on any side, and a configuration that would accommodate a rectangle of at least 100 square feet.
        ii. Common open space areas shall have a minimum dimension of 20 feet on any side.
    c. Elevation. A minimum of 60 percent of the required common open space shall be located at grade or the level of the first habitable floor.

d. Uncovered areas required. At least 33 percent of the perimeter of the private open space of each unit, or 100 percent of the roof of the open space of each unit, shall be open to the outdoors. Reference to this requirement shall be included in the Covenants, Conditions, and Restrictions of any common interest development.

2. Allowed uses. Required common open space:
    a. Shall be available for passive and active outdoor recreational purposes for the enjoyment of all residents of each multi-family project; and
    b. Shall not include driveways, setbacks, public or private streets, or utility easements where the ground surface cannot be used appropriately for open space, parking spaces, or other areas primarily designed for other operational functions.
3. Maintenance and control of common open space. Required common open space shall be controlled and permanently maintained by the owner of the property or by a homeowners' association. Provisions for control and maintenance shall be included in any property covenants of common interest developments.
4. Surfacing. Open space areas shall be surfaced with any practical combination of lawn, paving, decking, concrete, or other serviceable material.
5. Landscaping. The applicant shall submit a landscape plan for approval. Landscape design, installation, and maintenance shall comply with Division 36.330 (Landscaping Standards).
6. Slope. Required open space areas shall not exceed a slope of 10 percent."

The City will evaluate the SPMC Section 36.350.190.C standards as part of the zoning work called for in Program 3.a in Chapter 6.8 of this Housing Element and revise as needed to assure feasibility of projects at proposed densities on the sites in Table VI-50.

Residential Parking Requirements

The City's parking requirements are based on unit type and size and are shown in Table VI-37. Program 3.f updates the City's ADU ordinance, including parking requirements, to comply with current California law (already adopted in May 2021). The inclusionary housing ordinance (SPMC Chapter 36.350) also includes a streamlined process to waive parking requirements in conjunction with providing affordable housing units and utilizing the state density bonus.

Although subterranean parking is not required for residential developments, to achieve maximum densities and provide required parking, it is sometimes the only viable option. The visual simulation modeling conducted on selected sites in the proposed Housing Element inventory assumed underground garage parking in order to achieve multifamily projects under the highest densities allowed. Reduced parking is already offered as an incentive in the Code's provisions for inclusionary housing. As part of the review of zoning standards and revisions to zoning standards called for in Program 3.a in Chapter 6.8, the City will adopt parking requirements that facilitate the proposed maximum residential densities, for the sites listed in Table VI-50.

Table VI-37
RESIDENTIAL PARKING REQUIREMENTS

Duplex	4 spaces within a garage or carport, plus 1 guest space.
Live/work unit	2 spaces for each 1,000 sf of combined floor area.
Mixed-use development	As required for each individual land use.
Multifamily dwelling, condominiums, and other attached dwellings	1 bedroom unit—1 space; 2 bedrooms and/or greater—2 spaces within a garage or carport for each unit, plus 1 guest space per each 2 units. (1)
Organizational house	1 space for each bed.
Single-family housing	2 covered spaces
Accessory dwelling unit	1 space, covered or uncovered, unless within one-half mile of a transit stop (exempt from requirement).
Senior citizen residential Assisted living and group homes Independent Living	0.5 space for each residential unit, plus 1 space for each 4 units for guests and employees. 1 covered space for each unit, plus 1 uncovered guest parking space for each 10 units

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021

Cumulative Impacts of Development Standards

The City of South Pasadena current General Plan and Zoning Ordinance provide for a wide range of residential land use designations/zoning districts in the City, as illustrated in Table VI-35. Under the land use controls single-family neighborhoods were the predominant type of development, with very limited amounts of high-density housing built. The cumulative impact of the land use controls in place during the buildout of what is now the City of South Pasadena is a limited variety of housing types to meet a range of incomes. The City has reviewed the cumulative impact of the land use controls on recent developments and recognized that development will benefit from the adoption of the new General Plan and the Downtown Specific Plan. The cumulative impact of the land use controls in the downtown, and mixed-use zone are potentially constraining for residential development as well has height requirement and the City's Inclusionary Ordinance. Therefore, per ~~Program 2.j General Plan Affordable Housing Overlay,~~ Program 2.m, Inclusionary Housing Ordinance revisions, Program 2.n, the Ballot Initiative to increase heights and the Program 3.b, Mixed-Use zoning the City will evaluate all these development standards including but not limited to open space requirements, lot coverage, and heights, as well as permit requirements for multifamily developments to ensure that development will occur throughout the planning period. The City is committed to amending development standards to ensure these requirements are not so restrictive that they constrain residential development.

Zoning Standards: Flexibility for Projects with On-site Affordable Housing

Compliance with all of the City's Zoning Code regulations, such as maximum height regulations, lot coverage, and/or floor area ratio restrictions, and parking standards could potentially present difficulties for the development of affordable multifamily housing. The South Pasadena Zoning Ordinance now includes two processes that offer waivers from strict application of the standards for projects that include affordable housing. These are:

- SPMC 36.375.080, Streamlined State Density Bonus Review. These provisions adopted with the inclusionary housing ordinance provide projects with on-site affordable housing the opportunity to incorporate strong architectural design and in return receive automatic approval of certain waivers including a height bonus, height averaging, parking reductions and flexibility in the unit size of the project's affordable units. The approach is standards-based to reduce discretionary approval, and is not a separate permit (no additional permit fee required).
- SPMC 36.410.100, Planned Development Permit. The planned development permit process allows the approving body to modify any development standard, such as the number of required parking spaces and maximum floor area ratio, to provide a quality design and facilitate the development of affordable housing.

With the ability to modify standards that can act as constraints to construction of housing, and by offering these waivers through a ministerial process for projects with affordable housing or through a process that is processed together with other required discretionary permits, the City's development standards and parking requirements would not impede residential development.

Hillside Development: The City's Zoning Code includes provisions for hillside protection applicable to lots with an average slope of 20 percent or greater. The sites included in Table VI-44 that are on slopes are all on slopes less than 20 percent and are developable in accordance with the City's hillside ordinance. The City views its hillsides as a valuable resource to the community, and therefore, the hillside protection provisions of the Zoning Code are intended to ensure safe and minimally damaging development of lots located on the City's hillsides through the application of strict development standards. Issuance of building or grading permits for the construction of any structure on any hillside lot requires approval by the Planning Commission of a hillside development permit for the project.

Development of the hillside area is costly due to the cost of grading, geotechnical engineering issues, the nature of the construction required, the public services that must be provided to these areas, and in some cases, substandard conditions of existing infrastructure available to serve the site. Some of these higher costs are attributable to provision of water for both consumption and fire prevention and compliance with strict construction standards. In addition, public and private access to hillside sites is expensive to construct and maintain. Despite the constraints associated with hillside development, the City continues to receive applications for homes on sloped lots. Seven recently approved and constructed projects have included homes on slopes between 22 and 54 percent. Details about the projects are provided in the table below:

PROJECT	LOT SIZE (SQ/FT)	SLOPE (%)	APPROVAL DATE
226 Warwick	4,465	35.7	December 2019
228 Warwick	4,352	37.8	December 2019
804 Valley View	7,500	38.0	October 2020
807 Rollin	9,970	22.1	January 2021
1502 Indiana	7,170	38.0	November 2021
1818 Peterson Ave.	3,740	54.0	October 2021

Building Codes and Enforcement

In addition to land use controls, California building codes also affect the cost of housing. The City has adopted and enforces the 2019 California Building Code and has made no local amendments. Program 1.c calls for the City to continue its complaint-based code enforcement program and to address identified sub-standard housing conditions surveyed in 2022. In addition, in the City's 2021-2026 Strategic Plan adopted in December 2021, an action was included to develop and present an Occupancy Inspection Program and Policy to the City Council. That work has been included in the Fiscal Year 2022-2023 workplan.

Development and Planning Fees

The City collects various fees from applicants to cover the costs of processing permits and providing necessary services and infrastructure. Table VI-38 describes South Pasadena's 2022 planning fee schedule. The City fee schedule is available on the City website.

Table VI-38
2022 PLANNING FEE AND IMPACT FEE SCHEDULE

PLANNING APPLICATION	FEE
Variance	$3,701.00 (first); $2,611.00 (each additional)
Conditional Use Permit; with first variance	$3,925.00; $5,048.00
Administrative Use Permit	$1,745.00
Temporary Use Permit (non-profit)	$258.00
Temporary Use Permit	$517.00
Tentative Parcel Map	$4,164.00
Tentative Tract Map	$11,291.00
Lot Line Adjustment/Parcel Merger/Certificate of Compliance	$ 2,244.00
Hillside Development Review; with variance	$2,224.00; $3,365.00
General Plan Amendment	$22,433.00
Vacation-Easements, Alley's, Streets	$1,978.00
Zone Clearance	$70.00
Cultural Heritage Commission-Landmark Review	$1,683.00

PLANNING APPLICATION	FEE
Cultural Heritage Certificate of Appropriateness for Additions/ Alterations	$1,683.00 (single-family); $3,365.00 to $10,095.00 (multifamily (3-8 to 100+ units))
Categorical Exemption	$158.00
Initial Study	$5,608.00
Environmental Impact Report	$28,041.00
Negative Declaration	$317.00
Mitigation Monitoring Inspection & Administrative Fee	Actual Cost
Zoning Text & Map Amendments	$11,216.00
Specific Plan Application	$11,216.00
Specific Plan Amendment	$22,433.00
Development Agreement Review	$11,216.00
Planned Development	$11,216.00
Technology Surcharge (Percentage Applied to Fire, Building, Engineering, and Planning Permits)	10%
General Plan Maintenance Fee (Percentage of Building Permit Feet)	15%
DEVELOPMENT IMPACT FEES	
Residential	$1.64 per sq. ft.
Park Impact Fee -- Residential	$7.65 per sq. ft.
Park Impact Fee – Residential Remodel	$7.65 per sq. ft. > 250 sq. ft.
Park Impact Fee – Senior Housing	$2.95 per sq. ft.
Public Art Development Fee – on-site	1% of total building valuation
Public Art Development Fee – in-lieu	1.5% of total building valuation
School Fees	$4.08 per sq. ft.
Water Connection	$7,916.00 per unit
Sewer Connection	$2,094.00 per unit
Los Angeles County Sanitation District	$3,980.00

Source: City of South Pasadena July 2021 Master Fee Schedule, SPUSD 2019-2020 Statutory School Fees, South Pasadena Building Division Estimated Fees for Residential Development, South Pasadena Public Works Department.

South Pasadena's development fee schedule is tied to the cost of providing necessary services. City fees may be waived as part of the incentive package for affordable housing or ADUs.

As discussed in the section above on construction costs, developers are required to pay development impact fees for City maintenance and improvement of the city's aging infrastructure of streets, sewers, storm drains, and water lines.

Typical Residential Project Fee Estimate

Table VI-39 includes an estimate for the development costs of single-family and multifamily housing scenarios in South Pasadena. The estimated totals assume one 1,200-square-foot single-family home or an 86-unit multifamily complex. To develop the single-family home, it would cost approximately $32,293 in fees. To develop an 86-unit multifamily complex consisting of 87,328 square feet of general living area, it would cost approximately $714,000 total in fees ($8,302 for each unit). In terms

of total cost (i.e., fees, construction, and land costs), it would cost $330,495 per single-family unit and $548,449 per multifamily unit. The proportion of the fees to the total development cost of the multifamily scenario is less than 2 percent and would make up approximately 10 percent of the total development cost for the single-family scenario.

Table VI-39
ESTIMATED TOTAL FEE COSTS FOR NEW HOUSING*

DEVELOPMENT COST FOR A TYPICAL UNIT	SINGLE-FAMILY (1,200-SQUARE-FOOT HOME)	MULTIFAMILY (86-UNIT COMPLEX)
Total Estimated Fees Per Unit	$32,293.70	$8,302.33
Estimated Development Cost Per Unit	$330,495.50	$548,449.45
Estimated Proportion of Fee Cost to Overall Development Cost Per Unit	10%	1.51%

* Fees estimated at time of housing element preparation; should be considered approximate and will vary by project.

Regulations Impacting Housing Supply

The City's 2021 inclusionary housing regulations will have a meaningful impact on the supply of affordable housing. They are discussed in detail in Section 6.6.1 of this Housing Element under Zoning Provisions to Encourage Affordable Housing. Impacts of the inclusionary housing requirements on development costs and affordable housing are included in that section. Additionally, the 2021 ADU ordinance amendments, including the Phase II regulations for historic properties, are expected to continue to increase ADU development. ADUs are prohibited for use as short-term rentals in order to keep them in the housing stock for year-round residential use. The City does not regulate short-term rentals in other ways. There are no other recent ordinances in the City that affect the cost and supply of housing. The other city regulation that impacts housing supply is the citywide height limit, discussed in more detail below.

City Height Limit Initiative

On July 12, 1983, the voters in South Pasadena approved a citywide height limit of 45 feet in a special municipal election (see Section 36.300.040 of the SPMC). The 1983 height limit (and parking variance restriction) reflected a backlash to a project ("Twin Towers") that would have created 10- and 12-story high-end office towers on the property at Fair Oaks and Magnolia. Protestors had also delayed a 9-story project at Fair Oaks/Grevelia next to the freeway, which was subsequently dropped. The Council favored the project, which would have provided significant tax revenues for the City. The initiative's backers focused on how this high-rise would change the City's small-town character. Opponents of the initiative focused on how a blanket 45 foot height citywide was too sweeping and would have unanticipated consequences, including scaring away anyone interested in investing in South Pasadena to create economic development activity.

The early 1980s was a time of recession and the State was cutting back on services. The City's finances were in bad shape. It seems that the mini-malls that lined the street were seen as eyesores and some were vacant, and the Council favored their replacement with higher quality development. Projects were being approved in compliance with the Zoning Code. Developer interest went away

after the initiative. There is now a Bristol Farms on the Twin Towers site surrounded by a surface parking lot and some other, smaller retail buildings. The arguments in the paper at the time did not include any that related to residential/fair housing concerns.

This ballot initiative can only be amended or rescinded through another vote of the electorate. However, some projects that receive state density bonuses and incentives, including most projects subject to the City's inclusionary housing regulations, may request and receive a height increase beyond the ballot initiative limit, in order to comply with State law, which takes precedence.

The citywide height limit could act as a constraint on housing development. Sites proposed to receive the Affordable Housing Overlay to increase the options for density with affordable housing projects are discussed in Section 6.6.2 under Sites to Address the Lower Income RHNA. The other sites proposed for density increases are currently zoned Business Park (BP), Commercial General (CG), Residential Medium Density (RM) or are in the Mission Street Specific Plan (MSSP) district. All of these zoning districts currently have a maximum height of 35 feet (See Tables VI-35 and VI-42).

This section discusses the research that the City conducted to ensure that proposed density increases for sites to accommodate the lower-income RHNA (Section 6.6.2) are feasible in light of this constraint. The analysis accounted for existing height limits as well as increases proposed in the DTSP or through other zoning changes.

As part of the early outreach for the Housing Element Update, surveys and meetings were conducted to gauge public interest in a potential ballot initiative to increase the maximum allowed height in the city above 45 feet either citywide or in certain areas. The process to place an initiative on the ballot takes months of lead time so this was a priority for the early outreach as a positive result would have required placing the measure on the November 2020 ballot in order to maintain the housing element project timeline. Discussions with the Planning Commission in July 2020 and public testimony did not indicate support for pursuing a ballot measure. Rather, it was considered to be a better direction to research the potential for development within current limitations.

Following that decision, the analysis of increased densities for certain sites being considered for the Housing Element sites inventory focused on densities that could be accommodated within the existing 45 foot height limit. All types of multifamily or mixed use development on sites in the draft Downtown Specific Plan (DTSP) Area are proposed to allow 3 stories or 35 feet in height. In addition, the draft DTSP contains a height bonus for projects that include at least 20 percent deed-restricted affordable units of up to 45 feet, consistent with the inclusionary housing ordinance. For sites in Table VI-50 currently designated BP, CG and RM, outside of the proposed DTSP, development standards are proposed to be amended to increase the maximum height to 45 feet.

The project team undertook detailed analysis of higher density precedent projects, visual simulations of potential housing sites in South Pasadena, and mathematical analysis to determine feasible densities within the existing citywide height limit. Presentations about this analysis were made at multiple public hearings and workshops during the second half of 2020. The review of precedent projects in South Pasadena and throughout the region was one of the first steps in the analysis, reviewing more than 40 projects in the 2 to 3-story range, another 40 projects in the 4-story range, and dozens of others that were 5-stories or taller. The average density on the 2 to 3-story projects was 39 units per acre. The average density on the 4-story projects was 72 units per acre.

The City also analyzed the impact of the 45 foot height limitation on unit sizes and examined the development standards (besides height) that would be needed to achieve high quality design while achieving densities of 70 or 80 units to the acre. Two actual projects, one in Santa Monica (100% affordable) and one in Hercules (market rate) in northern California were modeled for this analysis (see Figure VI-32). Both projects include a range of bedroom types. The Hercules project that was built at 76 units per acre average had an average unit size of 825 square feet. At 80 units per acre, the Santa Monica project had a smaller average unit size (732 square feet) although it included units with up to three bedrooms. Both projects achieved a level of design that avoided boxy massing that would not be compatible with South Pasadena's urban form. The analysis confirms that the densities and heights proposed in the sites inventory, to be implemented through rezoning, are reasonable and feasible.

Figure VI-32
HIGHER DENSITY PRECENT PROJECTS WITHIN 45 FOOT-BUILDINGS



76* du/ac Hercules, CA

**actual building is 4-stories, but 76 du/ac calculated as if it were 3 -stories*

» Precedents and unit sizes of 3-story buildings with density maximized, within 45 feet height

ACHIEVABLE HOUSING DENSITIES IN A THREE-STORY BUILDING

Max Density (du/ac)	Unit Size (Square Feet)			Example				Unit Mix				
	Average	High	Low	Project	Acres	Tot Bldg Area	Total Units	Studio	1 bdrm	2 bdrm	3 bdrm	Afford-able
80	732	1,054	554	Las Flores, Santa Monica	0.65	40,270	55	0	26	14	14	100%
76	825			Hercules, CA	2.2	151,932	172	32	92	48	0	Market



80 du/ac Los Flores, Santa Monica

Source: PlaceWorks, 2020

Visual simulation analyses were performed on representative inventory sites including the vacant site in Ostrich Farm (Site 1), the Tyco site in Ostrich Farm (Site 4), and Meridian site (Site 10), Site numbers in parentheses correspond to the numbering in Appendix A and Table VI-50. The analysis included modeling multiple densities and heights on each site. It also included identifying precedent projects from the list mentioned earlier in this section that could be suitable for the site in terms of design, scale and massing. These sites occur in different areas of the city and have different contexts so were chosen to represent what could happen on the whole range of sites chosen to receive higher densities. All of the representative sites analyzed are proposed to receive a maximum allowed density of 70 units per acre which is the highest base density proposed for sites in the Housing Element and in the city overall in the proposed General Plan Update. Some of the other sites with proposed density increases have lower proposed maximum densities so could also feasibly develop within the 45 foot height limit based on the analysis of higher density projects.

Based on the analysis and information previously discussed, that there are project examples in which the 45-foot height limit does not preclude the ability to build with densities of up to 70 units per acre. However, the South Pasadena community has need for a variety of unit sizes and values quality design. Therefore, Program 2.n is included in this housing element, requiring the City to place an initiative on a ballot by 2024 to ask the voters to increase the height limit for projects containing residential units in some areas of the City after conducting additional community outreach.

It should be noted that current development standards are not currently seen as a constraint to development. In anticipation for adoption of the General Plan reaching maximum densities could be considered a constraint. Implementation of Program 2.n will ensure the city is able to continue to allow for a variety of housing types. Local Review and Permit Procedures

The Zoning Code stipulates the residential types permitted, permitted with an administrative use permit, conditionally permitted, or prohibited in each residential zone. Permitted uses are those uses allowed without discretionary review.

Typically, developers in South Pasadena build the maximum number of units allowed in the relevant zoning district. Until now, typical built density for RS sites has been one unit per buildable lot, but the development potential has recently changed with the enactment of SB 9. In zones that allow higher densities, parcels usually develop to the density allowed in that zone. It is too early to tell how many single-family property owners with parcels that are not within historic districts will opt to build two units or subdivide their lots to build more, but the City will review and approve applications under the new regulations in compliance with both State and local codes.

Table VI-40 describes the allowable uses in each residential zone.

Table VI-40
ALLOWED RESIDENTIAL USES AND PERMIT REQUIREMENTS

ALLOWED USES AND PERMIT REQUIREMENTS FOR ZONING DISTRICTS THAT ALLOW RESIDENTIAL DEVELOPMENT	P - Permitted Use CUP – Conditional-Use Permit Required AUP – Administrative-Use Permit Required, Use not allowed.											
LAND USE (1)	**CF**	**OS**	**AM**	**MSSP**	**CO**	**CG**	**BP**	**RE**	**RS**	**RM**	**RH**	**SPECIFIC REGULATIONS**
Accessory dwelling unit	--	--	CUP	--	--	--		P	P	P	—	36.350.200
Accessory residential uses and structures	--	--	--	--	--	--		P(3)	P(3)	P(3)	P(3)	36.350.170
Bed & breakfast inn (B&B)	--	--	--	P	--	--		CUP	CUP	CUP	CUP	36.350.070
Child daycare center	--	--	--	--	--	CUP	CUP	—	—	CUP	CUP	36.350.080
Child daycare—Small family daycare home	--	--	--	--	--	--	--	P	P	P	P	36.350.080
Child day care—Large family daycare home	--	--	--	--	--	--	--	P	P	P	P	36.350.080
Emergency Shelter	--	--	--		--	--	P	--	--	--	--	36.350.250
Home occupation	--	--	--	--	--	--		P	P	P	P	36.410.030
Manufactured Homes (4)	--	--	P	P	--	--		P	P	P	P	
Medical services—Extended care	--	--	--	--	--	--	--	—	—	—	CUP(2)	
Mixed-use projects	--	--	--	P	CUP	CUP	--	--	--	--	--	36.350.120
Mobile Home Parks	--	--	--	--	--	--	--	--	--	--	--	
Multifamily dwellings	--	--	--	P	--	--		—	—	P	P	36.350.180, 190
Organizational house (sorority, convent, etc.)	--	--	--	--	--	--		—	—	CUP	CUP	
Residential care facility, 6 persons or less	--	--	--	--	--	--		P	P	P	P	
Residential care facility, 7 persons or more	--	--	--	--	--	--		—	—	CUP	CUP	36.350.050
Residential care facility for the elderly (RCFE)	--	--	--	--	--	--		—	—	CUP	CUP	36.350.050
Single-family dwelling	--	--	P	P	--	--		P	P	P	P	
Single room occupancy	--	--	--	--	--	--	P	--	--	--	--	36.350.260
Transitional and Supportive Housing	--	--	--	--	--	--		P	P	P (multifamily types located in the RM district are subject to specific use regulations 36.350.180,190)	P (multifamily types located in the RH district are subject to specific use regulations 36.350.180,190)	

Source: Zoning Code, City of South Pasadena, accessed in 2020 and 2021
Notes:
(1) See Article 7 for land use definitions.
(2) Allowable locations restricted to El Centro Street between Fremont and Diamond; Fair Oaks Avenue; Fremont Avenue north of Monterey Road; and Huntington Drive.
(3) Permit required determined by Section 36.350.170.
(4) Per Article 7 of Chapter 36 "Zoning" of the South Pasadena Municipal Code, manufactured homes on permanent foundations are considered single-family land uses.

Permit Processing

The time it takes to process development permits and other governmental approvals contributes to the high cost of housing and is thus considered a constraint for housing development. South Pasadena recognizes the high cost of housing to the developers and has identified couple programs including, Programs 3.e and 3.l to address this issue. The programs include developing an electronic permitting system to increase efficiency in processing housing applications and hiring additional Planning and Housing Division staff to process applications as well as focusing on implementing the Housing Element programs. Additionally, in response to California law and the need to support more housing for the community, South Pasadena has been shifting toward more efficient permit review processes, reducing the number of hearing bodies involved in project approval and improving inter-departmental coordination to streamline the entitlement process.

Discretionary Design Review: Efforts to Streamline

Single- and all multi-family housing uses are permitted by right (P) in districts that allow residential uses. However, design review (discretionary) is required of all new structures and additions, with the exception of ADUs, emergency shelters, and single-room occupancy housing. City Planning staff reviews residential projects to confirm Code compliance in preparation to present them to the design review approval body. The City has three regulatory bodies with authority to review housing projects depending on the type and nature of a project: the Design Review Board (DRB), Cultural Heritage Commission (CHC), and Planning Commission (PC). Residential project applications with up to six units that are exempt from CEQA are heard by the DRB, and those with seven or more units (or not CEQA-exempt) require approval by the Planning Commission. Where the Zoning Code requires a conditional use permit for a use, the Planning Commission is the approving body. Projects may be appealed, and those that are appealed to the City Council receive priority scheduling. The required findings for design review located in SPMC Section 36.410.040.I are for the reviewing body to find that the design and layout of the proposed development:

1. Is consistent with the General Plan, any adopted design guidelines and any applicable design criteria for specialized areas (e.g., designated historic or other special districts, plan developments, or specific plans);

2. Will adequately accommodate the functions and activities proposed for the site, will not unreasonably interfere with the use and enjoyment of neighboring, existing, or future developments, and will not create adverse pedestrian or traffic hazards;

3. Is compatible with the existing character of the surrounding neighborhood and that all reasonable design efforts have been made to maintain the attractive, harmonious, and orderly development contemplated by this section and the General Plan; and

4. Would provide a desirable environment for its occupants and neighbors, and is aesthetically of good composition, materials, and texture that would remain aesthetically appealing with a reasonable level of maintenance and upkeep.

The sites with lower income RHNA assigned to them in Appendix A will all allow multifamily residential development without discretionary review once the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted. This will address constraints

associated with discretionary review currently required in the city. As part of the zoning work called for in Program 3.n in Chapter 6.8, the City will evaluate whether any of the above findings is subjective and a constraint to development of additional multifamily housing in the City on the sites identified in this Housing Element. Revisions will be made to the City's zoning regulations to address these constraints as part of implementation of Program 3.n. The City employs a streamlined processing and permit procedure for most projects, which includes one Design Review hearing and final approval of a project to be conducted by a single review entity, either the Design Review Board or the Planning Commission, depending on the project type. This makes it possible for housing projects to be approved at one public hearing unless the project is continued for revisions or appealed. The exception is for properties deemed historically or culturally significant, which require design review by the CHC followed by the Planning Commission. The intent is to expedite most housing applications through an easier permit process.

The processes listed in Table VI-41 generally run concurrently. Most residential projects do not require a Negative Declaration (ND/MND) or an EIR. Projects typically requiring a ND/MND or an EIR include a General Plan Amendment, Zone Change, and/or larger projects not qualified under CEQA exemptions. The City also requires the joint processing of related applications for a single project. As an example, a conditional use permit or planned development permit application is reviewed in conjunction with a tentative tract map, requested variances and design review. Such procedures save time, money, and effort for both the public and the developer. Applications for building permits are usually submitted within one year once a project is fully entitled. To the City's knowledge, no requests have been made to develop any site in the existing Housing Element sites inventory at lower densities than anticipated in the inventory.

The City is also preparing the Downtown Specific Plan to increase housing production and improve transparency in design requirements. The Downtown Specific Plan encourages quality housing development for a range of income levels in Downtown South Pasadena through the following actions:

- Develop and adopt a Form-Based Code for the Downtown area that emphasizes pedestrian orientation, integration of land uses, treatment of streetscapes as community living space, and offers a streamlined development review process. (A3.2a)

- In the Downtown Specific Plan area, reduce the minimum parking requirement for two-bedroom or larger units in multifamily residential buildings from 2 spaces per unit to 1.5 spaces per unit, and consider "unbundling," under which parking spaces must be sold or leased separately from units. (A4.8c)

- Review the time limits and other regulations for on-street parking supply in Downtown and streamline regulations to improve the ease of interpreting parking rules. (A4.8f)

- Provide building owners with tax incentives, grants, loans, and streamlined permitting process to renovate buildings that can be used as live/work spaces by artists. (A8.2b)

To further streamline the permitting process, the City will adopt objective development and design standards (Program 3.b), with assistance from a SCAG REAP-funded program in which South

Pasadena is participating. To align with the State's needs and goals for housing production, objective residential development and design standards will be updated to be simpler to understand and easier to implement, resulting in faster processing timelines. The objective development and design standards will include easy-to-read development and design regulations through measurable requirements, simple tables, and diagrams, and they'll require no personal or subjective judgement to determine if the standards have been met, allowing for a straightforward administrative process. This project was kicked off in March 2022, and public outreach was conducted from July 2022 to January 2023 to provide information about multi-unit and mixed-use objective standards and streamlined permitting processes to accelerate housing production. The project will culminate with the City's adoption of objective development and design standards within 120 days of adoption of a compliant Housing Element.

Application Processing Times

The time required to process an application varies greatly from one project to another and is directly related to the size and complexity of the proposal and the number of actions or approvals needed to complete the process. The timeframes that are generally typical for the City's entitlement processes, based on normal conditions, are shown in Table VI-41, below. Depending on the complexity of the project and required entitlements, Planning aims to approve a single-family project within four to six weeks from the date that the application is deemed complete provided no variances, exceptions, or zone changes are needed. For multi-family projects, pursuant to the State Permit Streamlining Act, the City's processing timeframe is based on the CEQA determination for the proposed project and can range from 120 days for a project deemed to be exempt, up to 12 months for a project requiring preparation of an EIR.

Nevertheless, over the past three years, between 2019 and 2021, the department sustained an unusually high amount of staff turnover at all levels, which disrupted these timeframes and delayed several housing projects. This was exacerbated by the COVID-19 pandemic, which interrupted the work environment and the public hearing processes. Despite the pandemic, in 2020, the City prioritized addressing the application backlog and three important multi-family housing projects were approved in 2020-21, including the City's first project with affordable housing based on State density bonus law (prior to adoption of the inclusionary housing ordinance). The City also prioritized the adoption of Code amendments to support housing, including the inclusionary housing ordinance and a comprehensive update to the ADU ordinance. The ADU ordinance updates in particular have simplified review of ADUs, establishing clear, objective standards for staff-level approval. These applications represent a high percentage of recent Planning applications and processing time was greatly reduced in 2021.

To prioritize more efficient application review and approval, the Council approved an increase to the Community Development Department budget in 2021, adding new staff positions. The recognition of the relationship between staff enhancements and more efficient processing is expressed in this housing element through Program 3.l, which commits to increasing staff resources and creating a dedicated housing division within the Community Development Department. Additionally, application processing time will be reduced when the City acquires the electronic permitting system (Program 3.e).

Table VI-41
TYPICAL TIMEFRAMES FOR PERMIT PROCEDURES

APPROVAL	TYPICAL PROCESSING TIME	APPROVAL BODY
Planning Clearance (Site Plan Review)	2 - 6 weeks	City Staff
Accessory Dwelling Units	30 - 60 days	City Staff
Administrative Use Permit	1 - 2 months	Community Development Director
Conditional Use Permit	4 - 6 months	Planning Commission
Planned Development Permit	6 - 12 months	Planning Commission
Variance	4 - 6 months	Planning Commission
Zone Change	6 - 12 months	City Council
General Plan Amendment	6 - 12 months	City Council
Design Review	4 - 6 months	Cultural Heritage Commission/ Design Review Board/Planning Commission
Tentative Tract Map	4 - 12 months	Planning Commission
Parcel Maps	4 - 6 months	Planning Commission
Negative Declaration	6 - 8 months	Planning Commission or City Council*
Environmental Impact Report	8 - 12 months	Planning Commission

Source: South Pasadena Community Development Department, 2022

* Depending on entitlement and significance of impact

City Staff Assistance in the Permit Process

City staff assists developers to provide information and guidance on the entitlement process in order to expedite approval procedures and reduce the likelihood of unnecessary timing constraints on development. A project often begins with an informal, courtesy meeting, at which the developer can present the concept to Community Development staff and get feedback and guidance for complying with requirements of the Code and the design review process. Once the developer submits an application, with the required components, such as a site plan, floor plans, elevations, landscape plan, and, in some cases a subdivision map, the Planning Division, Building and Safety Division and other agencies, such as Public Works and the Fire Department, will review for Code consistency and flag concerns in order to avert problems that might otherwise not be detected until building permit review later on.

After the project is entitled, the Building and Safety Division performs plan checks and issues building permits. Throughout construction, the building inspector inspects the project site to ensure compliance with requirements and to monitor progress. This process is typical and does not impose an undue time constraint on most developments.

Permits to Encourage Development of Affordable Residential Projects

The Zoning Code provides for flexibility in the application of Zoning Code standards through the planned development permit process for multifamily projects that include a certain percentage of the project as affordable housing. The purpose of the planned development permit is to allow

consideration of innovation in site planning and other aspects of project design and more effective design responses to site features, uses on adjoining properties, and environmental impacts than the Zoning Code standards would produce without adjustment. Planned development permit approval may be requested for an affordable multifamily housing, mixed-use commercial, and multifamily residential development, or senior housing project and requires approval of a conditional-use permit. Planned development permit approval may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, such as floor area ratio, building height (but not beyond the ballot initiative maximum of 45 feet), setbacks, parking, and street layout.

Affordable housing projects may also qualify for the granting of a density bonus and incentives and/or concessions that can include deviations or waivers from certain development standards, as established in the Zoning Code for multifamily development. Program 2.e is proposed to update the City's zoning to comply with current state density bonus law. Other programs that will address the need to streamline the development process include Programs 2.a, 2.k, 2.l, 3.a, 3.e, and 3.l.

6.5.3 Environmental Constraints

While the City of South Pasadena is predominantly developed, there are vacant and underutilized parcels on which development can be accommodated. Many of these parcels, however, are impacted by environmental constraints and sensitivities.

Topography

The largest concentration of undeveloped land for new residential development is located in the City's hillside area referred to as the Southwest Monterey Hills. Development in this area is constrained due to steep slopes, substandard lots, unimproved roads, and geologic and seismic-related issues. Historically, development has varied in the degree and sensitivity to which it has accounted for these constraints. Some developments have sited housing units in ways to maintain the hillside's unique landform while others have used extensive grading to alter the natural landform. The extent to which development will be permitted on the City's hillsides in the future is of particular concern.

The remaining undeveloped or primarily undisturbed open space in the City, located primarily in the following areas, represents opportunities for conservation, habitat protection, and open space use:

- The canyons, hillsides, and steep topography in the Southwest Monterey Hills, and the primarily City-owned vacant, undeveloped lands in the southwest corner of the Southwest Monterey Hills;
- The Arroyo Seco and adjacent areas;
- Upper slopes in the Monterey Road/Pasadena Avenue/Kolle Avenue/Brunswick Avenue/Oak Hill Avenue residential areas;
- Raymond Hill Site

The following are more detailed discussions of the City's environmental constraints and hazards that affect, in varying degrees, existing and future residential developments.

Slope Stability

The Safety Element of the General Plan identifies landslide areas in the Repetto Hills just inside the City's western boundary. The Monterey Road Landslide area, in the southwest portion of the City, is a particular area of concern. Although small in geographic extent, the landslide area is extremely unstable in certain portions and is located in or near the majority of remaining undeveloped land in the City. Liquefaction of the soil is of secondary concern. The Los Angeles County General Plan Safety Element indicates that South Pasadena is at low risk for liquefaction.

Seismic Hazards

The City of South Pasadena is located in a seismically active region, in an area of potential fault rupture, strong ground shaking, and slope instability. Seismic hazards can affect the structural integrity of buildings and utilities, and in turn can cause severe property damage and potential loss of life. A series of faults, including regional and local faults, have the potential to impact the City. Regional faults with potential sources of ground shaking within the City include the Sierra Madre Fault system, the Whittier Fault, and the San Andreas Fault. The Raymond Fault and the Los Angeles Fault are the only known active faults of local significance actually located in South Pasadena and are both classified as being located within an Alquist-Priolo Study Zone. A seismic event along any of these faults has the potential to generate surface ruptures that would affect structures within the city.

Flooding

The City of South Pasadena is located within Zone X of the National Flood Insurance Rate Maps (FIRM), which designates areas of minimal (.2% Annual Chance) flooding. As there are no floodplain areas within the City, there are no pertinent flood hazards.

Fire Hazards

The California Department of Forestry and Fire Protection has identified all the land in adjacent Los Angeles along South Pasadena's western and southwestern boundaries as being a "very high fire hazard severity zone." Although the state did not include South Pasadena in this fire area, a fire starting in the neighboring Los Angeles neighborhoods of Garvanza, Highland Park, Montecito Heights, or Newtown Park, could spread into the Monterey Hills community of South Pasadena under certain prevailing wind conditions. In February 2020, the Council adopted Ordinance 2342, which established a "High Risk Fire Area… defined as those properties located South of Monterey Road, extending to the City border, and West of Meridian Avenue, extending to the City border." This represents approximately 25 percent of the land area in the city.

Climate change is anticipated to increase the frequency and severity of fire events across California, including in Los Angeles County. SB 99 (2019), passed in response to the destruction of Paradise, California, in the 2018 Camp Fire, requires that all local jurisdictions ensure that all residential developments in a hazard area have a minimum of two evacuation routes. The City is required by this law to ensure that residents of Monterey Hills can effectively evacuate in the event of an emergency given the community's proximity to a fire hazard severity zone. To reduce the threat of fire in the hillside areas, more restrictive building standards are applied to new residential developments, including accessory dwelling units (ADUs), requiring fire sprinklers and specific

roofing materials. This requirement increases the cost of developing new residential structures but is warranted by the fire risk inherent in this area.

Open Space

Constraints to development include sensitive environmental resources. Zoning regulations are designed so that development in the hillside areas protects the "view-shed" both to and from the hillsides and retains as much remaining natural vegetation as possible. The City's Zoning Code encourages sensitive forms of development, which complement the natural and visual character of the City and its hillsides.

There are some open space areas that do not lend themselves to development. These areas have been left in their natural state and are maintained under private ownership. Such open space lands include the undeveloped portions of the hillsides, steeply sloping topography and canyons in the Southwest Monterey Hills, portions of the Altos de Monterey, and Raymond Hill.

The City owns 15.89 acres of unimproved land in the Altos de Monterey hillside residential tract, referred to as Lot 117. This area is considered an open-space resource to the neighborhood and is not intended for future development.

The sites identified in the Housing Element inventory can be developed with the number of units identified on each site even with environmental constraints taken into consideration.

6.6 HOUSING DEVELOPMENT RESOURCES

6.6.1 Zoning Code Resources

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all income levels, including multifamily rental housing, emergency shelters, mobile homes, and transitional and supportive housing. The following is a discussion of the Zoning Code regulations that serve to encourage and facilitate a variety of housing types.

Multifamily Residential Districts

South Pasadena's current Zoning Code provides for a Residential Medium Density (RM) district allowing for development of 6 to 14 dwelling units per acre and a Residential High Density (RH) district allowing for development of multiple dwellings of 14 to 24 units per acre. Multifamily residential units are permitted in the RM and RH zoning districts and do not require a conditional use permit (CUP). Multifamily housing is also allowed in the Mission Street Specific Plan (MSSP) district. Programs in this Housing Element and changes proposed in other elements of the General Plan will allow multifamily housing in more areas of South Pasadena and at higher densities, including the proposed Mixed-Use District and proposed Downtown Specific Plan (see Program~~s 2.j, 2.k, and~~ 3.a).

Mixed-Use Zoning Code Provisions

Mixed-use development projects are those that integrate retail and/or office commercial uses with residential uses on the same parcel. Mixed use is allowed in the Commercial General (CG) zoning district and the MSSP zoning district subject to approval of a CUP. The Zoning Code requires commercial and residential uses within a mixed-use project to be fully separated, with residential units limited to the rear portion of the first story, and/or on the second and higher stories. The maximum allowable density for the residential component of a mixed-use project in a CG zoning district is 24 dwelling units per acre and up to 48 dwelling units per acre in the MSSP zoning district. On Bonus Sites on which additional parking is provided, up to one dwelling unit for each 900 square feet of lot area is permitted. On all other sites, up to one dwelling unit for each 1,500 square feet is permitted.

The General Plan Update and Downtown Specific Plan will amplify the role of mixed-use development in South Pasadena. In order to facilitate implementation of the housing plan, Zoning Code amendments will be considered that would change the processes and standards for mixed-use projects, significantly increasing the land resources available for mixed-use development.

The Zoning Code allows for waivers to development standards for mixed-use commercial and residential uses that include an affordable housing component consistent with the inclusionary housing ordinance. Some modifications may be allowed through a planned development permit.

Mixed-Use Development Regulations in the CG Zoning District

When applying development regulations to mixed-use development projects in the CG zone, the RH zoning district requirements, as described in Table VI-35, Residential Site Development Standards by Zoning District, apply to the residential component and the CG zoning district requirements, as described in Table VI-42, Commercial, Mixed-Use, and Business Park District Development Standards," apply to the commercial component.

Mixed-Use Development Regulations in the MSSP Zoning District

Mixed-use development projects in the MSSP zoning district are subject to the regulations as specified for the subject parcel in the MSSP (see Table VI-42). Development capacity for a project site within the MSSP is determined by a number of factors. A maximum of a 0.8 floor area ratio (FAR) is allowed to derive the total square footage permitted for development, but if public parking spaces are provided as part of the project, the project would be eligible to receive a density bonus to increase the development capacity of the site up to 1.5 FAR. The total number of units allowed within a mixed-use project in the MSSP is derived by dividing the total allowable square feet of development, based on permitted FAR, by 763 square feet, which was the average size of a residential unit within the MSSP when the plan was prepared. Limitations on the total number of units that can be realistically developed in the MSSP include the citywide maximum height restriction of 45 feet, physical dimensions and configuration of the project site, and whether required parking is proposed to be surface or subsurface level.

Program 3.a calls for adoption of the Downtown Specific Plan (DTSP), which will update the zoning and regulations throughout the existing MSSP and into other areas of the Downtown. The DTSP proposes to allow 50 dwelling units to the acre on Mission Street and 60 dwelling units to the acre in the rest of the Specific Plan Area. Multifamily residential uses will be allowed without discretionary review in any location on a site. This will include projects with 100-percent residential uses.

Accessory Dwelling Units

Accessory dwelling units (ADUs) are permitted as either attached or detached units in zoning districts that allow single-family and multifamily dwellings. Junior accessory dwelling units (JADUs) are also allowed in the City. The ADU regulations (SPMC Section 36.350.200) were last updated in June 2021 to comply with State law by allowing their construction in all residential locations, providing objective standards and clarifying the approval process. An illustrated, explanatory brochure explaining the ADU process was published and posted together with the new regulations to assist interested homeowners.

South Pasadena has an extensive historic preservation program, including many historic districts with single-family zoning. These districts are subject to State and local historic preservation laws as well as the ADU statutes. The City received a grant from the State Office of Historic Preservation to develop ADU standards and guidelines that would bridge the requirements of both with the purpose of encouraging ADUs with appropriate design requirements. The second phase of the ADU update, which provided objective standards and guidelines to allow ADUs on historic properties, was approved in December 2021. The City is committed to supporting the construction and legalization of ADUs, as described in Programs 3.f, 3.g, 3.h, 3.i, 3.j, and 3.k.

Manufactured Homes

Residential single-family detached housing makes up about half of the housing stock in the City and includes a small number of mobile homes. The City's Zoning Code considers a manufactured home that may or may not be on a permanent foundation to be a single-family dwelling and, as such, it is a permitted use in the Residential Estate (RE), Residential Single Family (RS), RM, and RH zoning districts subject to the same development regulations as established for conventional "stick built," single-family detached residential units. Because manufactured housing is permitted in all of the residential zoning districts, and the zoning regulations governing construction of manufactured housing are the same as those established for conventionally constructed housing, suitable opportunities are provided in the residential zoning districts for development of this housing type.

Housing for Persons with Disabilities

Group homes or residential care facilities represent a viable housing type for persons living with a disability and for seniors, providing a supervised group home environment with personal services and assistance with daily activities on-site. The Zoning Code includes provisions for group homes for persons with disabilities and residential care facilities for the elderly. The Zoning Code (SPMC 36.700.020 - Definitions) defines a group home as follows:

> "A dwelling unit licensed or supervised by any Federal, State, or local health/welfare agency which provides 24-hour non-medical care of unrelated persons who are handicapped and in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual in a family-like environment. Includes: children's homes; orphanages; rehabilitation centers; self-help group homes."

SPMC 36.700.020 – Definitions defines a Residential Care Facility for the Elderly (RCFE) as follows:

> "A housing arrangement chosen voluntarily by the residents, or the residents' guardians, conservators or other responsible persons; where 75 percent of the residents are at least 62 years of age, or, if younger, have needs compatible with other residents; and where varying levels of care and supervision are provided, as agreed to at the time of admission or as determined necessary at subsequent times of reappraisal (definition from Government Code Title 22, Division 6, Chapter 6, Residential Care Facilities for the Elderly). RCFE projects may include basic services and community space.
>
> RCFE projects include Assisted Living Facilities (Board and Care Homes), Congregate Housing, Independent Living Centers/Senior Apartments, and Life Care Facilities, as defined below.
>
> 1. Assisted living facility. A residential building or buildings that also provide housing, personal and health care, as permitted by the Department of Social Services, designed to respond to the daily, individual needs of the residents. Assisted living facilities may include kitchenettes (small refrigerator, sink and/or microwave oven) within individual rooms. Assisted living facilities are required to be licensed by the California Department of Social Services and do not include skilled nursing services.

2. Independent Living Center/Senior Apartment. Independent living centers and senior apartments are multifamily residential projects reserved for senior citizens, where common facilities may be provided, such as recreation areas, but where each dwelling unit has individual living, sleeping, bathing, and kitchen facilities.

3. Life care facility. Sometimes called continuing care retirement communities, or Senior Continuum of Care Complex, these facilities provide a wide range of care and supervision, and also provide skilled nursing care so that residents can receive medical care without leaving the facility. Residents can expect to remain, even if they become physically incapacitated later in life. Life care facilities require multiple licensing from the State Department of Social Services, the State Department of Health Services, and the State Department of Insurance."

Pursuant to State law, SPMC 36.220.030 (Table 2-2) - Residential Zoning District Land Uses and Permit Requirements permits residential care facilities of six or fewer residents in any residential district of South Pasadena subject to the same development regulations as are applied to residential uses of the same type in the same zone, as described in Table VI-35. Consistent with State law, the Zoning Code does not define family, does not establish a maximum concentration requirement for residential care facilities, and does not impose any special development standards for residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, which could constrain the provision of residential care facilities for the elderly or persons with disabilities.

The City's Zoning Code allows for residential care facilities for the elderly and residential care facilities of seven or more residents within the RM and RH zoning districts subject to the development standards described in Table VI-35 and approval of a CUP**.** In the case of residential care facilities providing assisted living for seven or more residents, the Zoning Code establishes special development standards for these facilities, as summarized below:

- There can be no impacts on surrounding properties that are more significant than would be caused by standard multifamily rental projects.
- Common indoor business, recreational, and social activity areas of a number, size, and scale consistent with the number of living units shall be provided, with no less than five percent of the total indoor floor area devoted to educational, recreational, and social facilities (e.g., library, multi-purpose common room, recreation room, TV room).
- Common laundry facilities must be provided of sufficient number and accessibility, consistent with the number of living units.
- Residents are limited to those in need of an assisted living environment, together with a spouse or partner in each unit.
- If an approved congregate care/assisted living facility is converted to another use, such as a conventional unrestricted multifamily project, the project is required to meet all applicable standards of the Zoning Code.
- Indoor common areas and living units must be provided with necessary safety equipment (e.g., safety bars), as well as emergency signal/intercom systems.

- Adequate internal and external lighting must be provided for security purposes.
- The entire project must be designed to provide maximum security for residents, guests, and employees.
- The project may provide common facilities for the exclusive use of the residents, such as a beauty and barber shop, central cooking and dining rooms, exercise rooms, and small-scale drug store and/or medical facility.
- A bus turnout and shelter along the street frontage is required if the facility is on an established bus route and its location coordinated with the transit authority.
- Facilities with 50 or more dwelling units must provide private dial-a-ride transportation shuttles, with the exact number and schedule to be determined by the City.
- Senior apartments and independent living centers may be allowed additional nonresidential facilities, including intermediate care facilities and personal services (for example, beauty salon, physical therapy) through CUP approval, without a requirement for additional parking, provided that the facilities are only for the private use of project residents.

Because the Zoning Code permits residential care facilities of six or fewer residents in any residential district of the city and does not impose any special development standards for these residential care facilities, over and above the zoning standards that are applied to any similar use in a residential district, the Zoning Code does not impose any constraints to the provision of residential care facilities for the elderly or persons with disabilities. Program 5.b is proposed to remove the CUP requirement for residential care facilities of more than six residents.

SPMC 36.410.110 - Reasonable Accommodation provides for granting a reasonable accommodation by the Community Development Director for a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability an equal opportunity to the housing of their choice. The granting of a reasonable accommodation is subject to the following findings (SPMC 36.410.110.G):

> The requested accommodation is requested by or on the behalf of one or more individuals with a disability protected under the fair housing laws and entitled to a reasonable accommodation;
>
> a. The requested accommodation is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy a dwelling;
>
> b. The reasonable accommodation will not impose an undue financial or administrative burden on the City;
>
> c. The requested accommodation will not result in a fundamental alteration in the nature of a City program or law, including, but not limited to, the General Plan, Zoning Code, design guidelines, and any specific plans; and

d. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health and safety of other individuals or substantial physical damage to the property of others.

To further address the housing needs of individuals with disabilities, this Housing Element includes a program objective to explore options for requiring that a percentage of all new multifamily residential projects in South Pasadena be universally accessible (see Program 4.e).

Emergency Shelters

The City's Zoning Code defines an emergency shelter as:

> "A residential facility, other than a residential care facility, operated by a provider that provides temporary accommodations to persons or families for a time period not to exceed six months per calendar year and which offers accommodations on a first-come first-served basis where the resident(s) must vacate each morning and have no guaranteed bed for the next night. For purposes of this definition, a "provider" shall mean a government agency or private non-profit organization that provides or contracts with recognized community organizations to provide emergency or temporary shelter, and which may also provide meals, counseling and other services, as well as common areas for residents of the facility."

There are currently no emergency shelters within South Pasadena. Emergency shelters are permitted in the Business Park (BP) zoning district, through a ministerial process, subject to specific standards contained in SPMC Section 36.350.250, which was last revised in 2013. The standards govern the size and location of shelters; require on-site facilities, such as laundry, cooking, and bathroom facilities and provision of support services; set parking standards, security lighting requirements; and require a management plan for City approval prior to occupancy.

Sites within the BP zoning district are within walking distance to the Los Angeles Metropolitan Authority (MTA) Line L South Pasadena station with connections to retail areas and job centers along the route, making this an appropriate location for this land use. There are multiple sites in the BP zone that offer opportunities for development of emergency shelters with more than 12 acres of land on 19 parcels. The parcels range in size from 0.06 to 2.33 acres. In addition to this existing capacity in the BP district, the proposed General Plan update and subsequent Zoning Ordinance revision will designate the BP as the Ostrich Farm District, with a corresponding increase in residential capacity through higher density and development standards.

State law allows for Zoning Code regulations to govern the operations of an emergency shelter, including the establishment of a maximum number of beds in any one shelter provided the maximum adequately addresses the City's homeless population need. The standards contained in SPMC 36.350.250 are listed below:

A. Special design standards:

a) Location requirements. An emergency shelter shall not be located any closer than 300 feet to another emergency shelter or within 300 feet of a residential use, public park, or public school.

b) Maximum number of beds. The maximum number of beds for an emergency shelter shall be 12 beds plus a residential unit for a full time on-site manager. The total number of beds in operation at one time in the City shall not exceed 20 beds.

c) Maximum occupancy. Maximum occupancy at any one time shall be 12 residents plus a minimum of one on-site manager.

d) On-site facilities. Each emergency shelter shall provide central laundry and cooking facilities, a minimum of one toilet per six beds per gender, a minimum of one shower per six beds per gender, and private showers for family shelter facilities. Resident storage areas shall be provided. At least one of the following specific support services shall be provided:

   i) Recreation room;
   ii) Counseling center;
   iii) Child care;
   iv) Referral services;
   v) Other similar supportive services geared to the homeless.

e) Off-street parking. One space per employee and one space per each four beds or one-half space per bedroom of a family unit with children plus up to five visitor spaces for service providers.

f) Lighting. Security lighting shall be provided. A plan for security lighting shall be submitted for review and approval by the Police Department and be installed and fully operational prior to occupancy of the facility.

g) Waiting areas. Intake areas and waiting areas shall be located to prevent queuing in the public right-of-way or a parking lot. These areas shall be screened from public view with either a six-foot high wall or landscaping reaching six feet in height.

B. Management and operations standards:

a) On-site security personnel and an on-site manager shall be present at the facility during all hours of operation.

b) Outdoor activities are limited to the hours of 8:00 a.m. to 9:00 p.m.

c) Resident check-in is permitted between the hours of 4:00 p.m. and 11:00 p.m. Residents are required to vacate the premises at 8:00 a.m. with no guaranteed bed for the next night.

d) Resident stays are limited to a maximum of six months per resident within a 12-month time period.

e) Loitering is prohibited.

f) A written management plan shall be submitted for review and approval by the Community Development Director prior to occupancy and shall address provisions for staff training, neighborhood outreach, security, screening of residents to ensure compatibility with services provided, training and treatment programs for residents, loitering control, and a staffing and services plan for assisting residents to obtain permanent shelter and income.

The City's existing standards for emergency shelters (SPMC 36.350.250) were consistent with State law when adopted in 2013; however, changes in State law (including AB 130, signed into law in September 2019) no longer allow local regulations to establish buffering standards between an emergency shelter and other land uses, restrict parking standards from requiring more than the number needed for a shelter's employees, and specify that the number of beds to be allowed in the city must be based on the most recent point-in-time count. As discussed earlier in Section 6.3.5, the 2020 LAHSA Homeless Count found 15 unsheltered individuals in South Pasadena and the 2021 count was cancelled due to the COVID-19 pandemic. The results of LAHSA's 2022 count, conducted between February 22nd and 24th, were not released at the time of this draft, but South Pasadena police, who participated, indicated that 28 individuals were counted within the City limits.

Accordingly, SPMC 36.350.250 must be revised to fully comply with State law (see Program 4.a). Revisions will include removal of current distancing requirement from other uses, revised parking requirements, a revised maximum number of beds to at least 30 to accommodate the 2022 point-in-time survey and in consideration of the cost and feasibility of providing this service, and any other changes to standards needed to comply with state law (see Program 4.a). The development standards and regulations applicable to all projects located within the BP zoning district and other nonresidential districts are described in Table VI-42.

South Pasadena maintains a Homeless Outreach Team, which operates a referral program to connect individuals living on South Pasadena's streets and open spaces to shelters in the City of Pasadena, which participates with the City of South Pasadena to provide services to these individuals. The Team provides transportation for individuals desiring to go to the shelter and monitors the location and conditions of individuals identified to be without housing in the city. Continuing commitment to provide this program is included as Program 2.f.

Table VI-42
COMMERCIAL, MIXED-USE, AND BUSINESS PARK DISTRICT DEVELOPMENT STANDARDS (From SPMC 36.230.040)

DEVELOPMENT FEATURE	REQUIREMENT BY ZONING DISTRICT			
	CO	CG	BP	MSSP
Minimum lot size	Minimum area and width for parcels proposed in new subdivisions.			
Area (square feet)	10,000 sf			N.A.
Width (feet)	50 ft			N.A.
Setbacks (feet)	Minimum setbacks required. See Section 36.300.030 for setback measurement, allowed projections into setbacks, and exceptions to setbacks.			
Front	25 ft on Fremont St. between the 110 freeway and Monterey Rd., 20 ft required otherwise.	None required	25 ft	5 ft
Sides, each	15 ft if adjacent to an RS district; none required otherwise.			5 ft
Street side	None required		None required	None required
Rear	None, except if adjacent to an alley 5 ft, or if adjacent to a RS district 25 ft		None required	None required
Lot coverage	Maximum percentage of total lot area that may be covered by structures.			
	No maximum		50%	60%
Floor Area Ratio	N.A.	N.A.	N.A.	Bonus sites with extra public parking: -Mixed Use and Residential: 1.5 Other Development Sites: -Mixed Use: 0.8 -Residential: 0.5
Height limit (feet)	Maximum allowable height of structures. See Section 36.300.040 (Height Limits and Exceptions) for height measurement requirements.			
Maximum height	35 ft			35 ft
Landscaping	As required by Division 36.330 (Landscaping Standards)			As required by Section 8.6.3 (Outdoor Open Space in Residential or Mixed Use Projects) of the Mission Street Specific Plan
Parking	As required by Division 36.310 (Parking and Loading)			As required by Chapter 6.0 (Transportation and Parking) of the Mission Street Specific Plan
Signs	As required by Division 36.320 (Signs)			As required by Section 7.5.2 (Signs) of the Mission Street Specific Plan

Transitional and Supportive Housing

Transitional housing is defined by the State, and by the City's Zoning Code, as:

> "Rental housing for stays of at least six months operated under program requirements that call for the termination of assistance and recirculation of the housing unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months."

Transitional and supportive housing uses are permitted in all residential zoning districts, subject to the same design standards as other residential uses in the district. In compliance with State law, and in conjunction with the General Plan Update and Downtown Specific Plan, transitional housing will also be included as a permitted use in other zones that allow for mixed-use residential and commercial development (see Program 4.b). Currently, there are no transitional housing or supportive housing facilities in South Pasadena.

While transitional housing aims to facilitate the movement of unhoused individuals and families to permanent housing, supportive housing is distinguished by the provision of on-site or off-site services that assist the residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community. This type of housing is defined as a group home in the City's Zoning Code. Program 4.b also addresses compliance with State law in regard to ensuring that supportive housing is permitted in a manner similar to other housing in all zones where housing is allowed.

In July 2019, the Governor signed AB 101, which allows Low Barrier Navigation Centers to be approved by right, without CEQA review required. Government Code Section 65660 defines "Low Barrier Navigation Center" as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. "Low Barrier" means best practices to reduce barriers to entry…"

As a form of transitional and supportive housing, this use is already permitted in residential zoning districts (SPMC 36.220.030, Table 2), and the definition defaults to the State law referenced above. However, the City has not yet incorporated a specific definition of Low Barrier Navigation Centers, which would clarify compliance with State law. Policy 4.4 and Program 4.b address the need to update the Code to include a definition of low-barrier navigation centers and expand to allow them within mixed-use zoning districts within one year.

Single-Room Occupancy

The City's Zoning Code defines Single-Room Occupancy (SRO) as:

> "A residential facility for homeless persons, other than a residential care facility, operated by a provider that offers housing consisting of single-room dwelling units that is the primary residence of its occupant or occupants for a period not to exceed six months per calendar year. For purposes of this definition, a "provider" shall mean a government agency or private non-profit organization that provides or contracts with recognized community organizations to provide SRO housing. SRO residential units must contain either food preparation or sanitary facilities or may contain both."

SROs are allowed by right in the BP zoning district, subject to the specific use standards in SPMC Section 36.350.260. South Pasadena does not currently have any SRO developments.

An SRO unit is generally between 200 and 350 square feet in size. These units provide a valuable source of housing for lower-income individuals and can serve as an entry point into the housing market for people transitioning into permanent housing. Some of the Code standards required for

SROs include that they may not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school and must be developed on a minimum lot size of 10,000 square feet with a maximum density of one unit per 1,600 square feet of gross floor area. The specific standards also include requirements for establishes setbacks, parking, common area open space, showers, cooking facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for review by the Community Development Director prior to occupancy and operations.

Zoning Provisions to Encourage Affordable Housing

In addition to the areas of the City where higher-density housing is allowed or is proposed to be allowed without discretionary review, the City's Zoning Code includes permitting procedures and incentive programs to encourage the development of affordable housing by allowing for flexibility in the application of development regulations and standards and through the approval of density bonuses for projects containing an affordable housing component. These zoning provisions are discussed herein.

a. Planned Development Permit

The City's Zoning Code provides flexibility in the application of development standards for a project containing an affordable housing or senior housing component pursuant to the approval of a planned development permit (see Municipal Code Section 36.410.100). Planned development permit approval may be requested for an affordable housing, mixed-use, or senior housing project to modify or adjust any applicable development standard of the Zoning Code. Approval of a planned development permit may adjust or modify, where necessary and justifiable, any applicable development standard of the Zoning Code, including, but not limited to, FAR, building height, setbacks, parking, and street layout. Planned development permits are approved by the Planning Commission at a public hearing and pursuant to findings summarized below.

1. The project must be consistent with the actions, goals, objectives, policies, and programs of the General Plan and any applicable specific plan, allowed within the applicable zoning district, and comply with all applicable provisions of the Zoning Code and adopted design guidelines other than those modified by the planned development permit, and be adequately served by public facilities, services, and utilities.

2. The approved modifications to the development standards of the Zoning Code are found to be necessary and appropriate to accommodate the superior design of the proposed project, its compatibility with adjacent land uses, and its successful mitigation of environmental impacts.

3. The location, size, planning concepts, design features, and operating characteristics of the project are and will be compatible with the character of the site, and the land uses and development intended for the surrounding neighborhood by the General Plan.

4. The site is adequate for the project in terms of size, shape, topography, and circumstances and has sufficient access to streets and highways, which are adequate in width and

pavement type to carry the quantity and type of traffic expected to be generated by the use.

5. The establishment, maintenance, or operation of the use would not be detrimental to the health, safety, or welfare of persons residing or working in the neighborhood of the proposed use, any neighborhood improvements, or the citywide welfare.

The Planning Commission may impose any conditions deemed reasonable and necessary to ensure that the project will comply with the findings. Standard conditions of approval applied by the Planning Commission as part of an approval for a planned development permit are summarized below.

1. Appropriate City building permits are required prior to construction.

2. The project must comply with all other requirements of any law, ordinance, or regulation of the State of California, City of South Pasadena, and any other government entity.

3. Construction sites are subject to industry standards for construction management for management of trash, debris, and disposal of construction materials.

4. Hours of construction are limited to 8:00 a.m. to 7:00 p.m., Monday through Friday; 8:00 a.m. to 6:00 p.m. on Saturday, and 10:00 a.m. to 7:00 p.m. on Sunday.

5. A demolition permit is required for any existing buildings to be demolished.

6. Fees including sewer connection fees and school development fees are required to be paid prior to issuance of a building permit.

7. Where required, CAL-OSHA permits must be obtained.

8. Compliance with all State of California disability access regulations for accessibility and adaptability is required.

9. Plan check for electrical, mechanical, plumbing, and sewer is required.

10. Mechanical ventilation in accordance with the Los Angeles County Building Code is required for parking garages.

11. A soils report is required.

12. A grading and drainage plan approved by the City is required prior to issuance of the building permit.

13. Structural and energy calculations are required to be provided.

14. Public dedications for necessary right-of-way adjacent to the project site are required, as applicable.

15. Reconstruction of substandard, broken, damaged, or out-of-grade sidewalk or curb and gutter, asphalt/concrete, in front of the site is required.

16. Compliance with all applicable standards of the California Code of Regulations Title 19, 2001 California Building Code, and 2000 Uniform Fire Code with appendices (South Pasadena Ordinance 2109), including class A roofing, spark arrestors, and weed abatement program is required.

Depending on workload, review and approval of a planned development permit by the Planning Commission can be completed within 6 to 12 months. The Housing Element includes Program 4.c to maintain the Zoning Code provision allowing approval of a planned development permit for projects proposing development of affordable housing to encourage its development.

b. Affordable Housing Incentives

The Council adopted SPMC Section 36.370 (Affordable Housing Incentives) in 2013 to incorporate State requirements to grant density bonuses and incentives and/or concessions for affordable housing by right. The "Affordable Housing Incentives" provisions of the Zoning Code allow for the granting of a density bonus to eligible projects upon approval by the Community Development Director and the granting of affordable housing incentives and/or concessions to eligible projects by the Planning Commission. State density bonus law has been updated since 2013 expanding the amount of bonus (up to 50 percent for many projects and up to 80 percent for 100-percent affordable projects), increasing the number of incentives and concessions the City must offer, and expanding the list of types of projects that are eligible for a State density bonus. Although the City implements state density bonus law as it is updated, the City has included Program 2.e in this Housing Element to update the Zoning Code to comply with current State density bonus law.

Some of the central components of the affordable housing incentives in SPMC 36.370 are a ministerial approval process for eligible projects; reduced parking requirements and allowing tandem parking or uncovered parking on the project site; a process for inclusion of a Child Care Facility and requirements to ensure unit quality. The location of the designated dwelling units within projects receiving a density bonus or incentives and/or concessions is at the discretion of the City with the goal to integrate the units into the overall project with designated dwelling units reasonably dispersed throughout the development, where feasible. Furthermore, the affordable units must contain on average the same number of bedrooms as the market-rate units, and must be compatible with the design or use of the remaining units in terms of appearance, materials, and finish quality. If a project is to be phased, the affordable units must be phased in the same proportion as the market-rate units, or phased in another sequence acceptable to the City. Alternatively, the City may authorize some or all of the designated dwelling units associated with one housing development to be produced and operated on an alternative development site.

As part of the approval of a density bonus and incentive and/or concession, the developer is required to record a deed restriction against the property that ensures that continued affordability of the designated units is maintained.

c. Inclusionary Housing Ordinance

In 2018, City Council directed staff to explore policies to proactively increase the production of affordable housing. In 2019, at the City Council's direction, the Community Development Department began outreach in the community, and heard strong support from the community for an inclusionary housing policy. After extensive outreach, and some delay due to the pandemic, on March 9, 2021, the Planning Commission recommended adoption of a draft inclusionary housing ordinance. The City adopted the inclusionary housing regulations (Ordinance 2355) ordinance on May 5, 2021.

This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. Those changes will be adopted at or near the same time as Housing Element adoption as will zoning updates to codify those changes outside of the Downtown.

The inclusionary housing ordinance provides for smaller projects to pay an in-lieu fee, which was planned to be adopted subsequent to the provisions. Additionally, the introduction of the inclusionary requirements necessitates a new administrative structure to ensure proper implementation and monitoring. The City has engaged a consultant firm to conduct an Inclusionary Housing In-Lieu Fee Study and Affordable Housing Program Recommendations, which will analyze project characteristics and make recommendations for the Council to adopt an in-lieu fee and establish an affordable housing program or participate in a regional affordable housing production program (see Program 2.b).

Inclusionary Requirements

The inclusionary regulations require any project with three or more residential units proposed in South Pasadena to include at least 20 percent of the base number of units in the project as affordable to lower- or moderate-income households. Applicants may pay an in-lieu fee instead of providing units only for projects containing three or four residential units, for any ownership project, or for fractional units calculated as part of the inclusionary requirement. The in-lieu fee option is described further in the next section.

The inclusionary requirement would change as the number of units in a project increases. Only rental projects between 3 and 10 units may include moderate-income units as part of the inclusionary mix. Larger projects with rental units would need to include a mix of lower-income and very/extremely low income units, as detailed in the ordinance. Ownership (condominium) projects containing for-sale inclusionary units would provide them as moderate-income units.

Table VI-43 summarizes the implementation alternatives allowed by SPMC 36.375.050 – Inclusionary Unit Requirement for different types of residential projects.

Table VI-43
INCLUSIONARY HOUSING REQUIREMENT OPTIONS

	3-4 RENTAL UNITS	5-10 RENTAL UNITS	11+ RENTAL UNITS	FOR-SALE UNITS
On-site Option	20% of base # of units; affordable to extremely low, very low, low, or moderate income	20% of base # of units; Designate an affordable unit as extremely low, very low, lower, or moderate income, provided that if the project includes two affordable units, either: a. Both units shall be lower income; or b. At least one shall be a very-low income unit and the other unit may be very low, lower, or moderate.	20% of base # of units; Provide 50% of required affordable units as extremely low or very low and 50% as lower-income units. In case of an uneven number, one more unit shall be provided as very low.	20% of base # of units; Provide as moderate-income units
Off-site Option	N/A	YES	YES	YES
Rehabilitation/ Conversion of Existing Units Option	N/A	YES	YES	YES
Land Dedication Option	N/A	YES	YES	YES
In-Lieu Fee Option	YES	N/A	N/A	YES

Source: City of South Pasadena, 2021; SPMC 36.375.050

Since the inclusionary requirements trigger eligibility for the State density bonus, the inclusionary regulations include provisions offering streamlined density bonus approval for projects that comply with objective design standards to create strong architecture. The intent of the design incentives is to promote clarity regarding the City's expectations for quality and contextual design for all projects, providing more certainty to applicants, particularly those on a large enough scale to have a stronger effect on the surrounding area. All of the sites included in the sites inventory to address the lower-income RHNA are of sufficient size to derive strong benefit from taking advantage of the proposed design incentives in the inclusionary regulations. The incentives offered exceed guarantees available under State Density Bonus law. Incentives are offered for height, minimum unit size, and parking. Based on the recently adopted regulations, the City expects an increase in higher-density residential development with on-site affordable units. Program 2.i calls for implementation and monitoring of the Inclusionary Housing ordinance.

In-Lieu Fee Option

The inclusionary ordinance provides alternatives to on-site provisions, as required by State law, but has been designed to encourage on-site provision as the preferred method of compliance. Payment of an in-lieu fee is an option for the smallest projects subject to the inclusionary regulations and for ownership projects. SPMC 36.375.110.B calls for an in-lieu fee that is "equivalent to the cost of providing a comparable unit for each unit that would have been provided in the project. The in-lieu

fee study was completed and resulted in various fee options. On March 16, 2022, the fee options were taken to City Council for review and to provide direction. On March 18, 2022, the Planning Commission reviewed and provided comments on the study and the Council's direction from the March 16th City Council meeting. The Commission's comments will be incorporated into the staff report for Council's public hearing to adopt a fee resolution tentatively scheduled for May 18, 2022. The City Council shall establish the fee by resolution, then it will adjust (as needed) annually. In the interim before the City Council establishes the fee, the Planning Commission may allow the in-lieu fee option and determine the amount on a project-by-project basis. The in-lieu fee is required to be paid to the City ahead of receiving a building permit or tree removal permit. The funds collected through the in-lieu fees must be used for maintenance and development of affordable housing, including contributions to the San Gabriel Valley Affordable Housing Trust Fund if approved by the City Council. Projects that opt to pay the in-lieu fee instead of providing on-site affordable housing will not qualify for a density bonus.

Alternatives to Building Inclusionary Units On-Site

There are a few alternatives to building the inclusionary units on-site for rental projects with five or more units. These include building the units on another site, donating land, or rehabilitating existing residential units and deed-restricting them as affordable housing. Use of these alternatives is subject to Planning Commission approval.

Impacts of Inclusionary Housing Requirements on Development Costs and Affordable Housing

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects as required by the ordinance.

The City has conducted a financial feasibility analysis of the inclusionary regulations including analysis of the ordinance with the adopted 20 percent threshold and an alternative 15 percent threshold. The analysis indicated that new market-rate projects are likely to be financially feasible while providing 20 percent of units at affordable rents or sale prices if the developer utilizes California's State Density Bonus law to increase the number of allowed market-rate units. However, without the use of the Density Bonus concession, it is not likely that market-rate projects would be financially feasible under the City's existing requirements. The City then conducted subsequent analysis to change the required number of affordable dwelling units to 15 percent of the base number of dwelling units. A range of for-sale and rental housing prototypes representative of likely new development in the City were reviewed to assess whether each prototype would be able to achieve standard development return metrics with the inclusion of required affordable units. Under a requirement to provide 15 percent of for-sale units at prices affordable to moderate-income households, townhome projects are likely to be financially feasible without any development incentives. In addition, under a requirement to provide 15 percent of rental units at rents affordable to low-income households, multifamily rental projects are likely to be financially feasible without any development incentives. Under a requirement to provide 15 percent of rental units at rents affordable to very-low income households, projects

developed at 70 units per acre are likely to be financially feasible without any development incentives. Based on this analysis, the City is proposing to revise the regulations with a 15 percent threshold (See Program 2.m).

In addition to the City committing to revising the City's Inclusionary Ordinance (Program 2.m) the City held a Developer Forum on August 15, 2022 to obtain additional feedback on the City's Inclusionary Ordinance. Developers encouraged the City to consider increasing the unit threshold above three units so that developers doing smaller projects won't be constrained by the inclusionary fees. The City will evaluate the threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law as stated in Program 2.m). See Appendix B for the Developer Forum notes.

Since the inclusionary regulations were recently adopted, the City has not yet been able to collect data to analyze its effect. Program 2.i commits the City to reviewing the effectiveness of the inclusionary regulations starting in 2023 and revising if and when this is deemed necessary for greater effectiveness.

6.6.2 Land Resources

This section describes the resources available for the development, rehabilitation, and preservation of housing in the City of South Pasadena. This section includes an inventory of sites zoned for residential development that are suitable for future housing development in South Pasadena and an evaluation of the City's ability to provide adequate sites to address its identified share of future housing needs.

Comparison of Site Inventory with RHNA

SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-44. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.

Table VI-4452
COMPARISON OF SITE CAPACITY AND RHNA

Site Category	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Units
Constructed Units	0	0	9	9
Entitled and Pipeline Units (Table VI-45)	58	35	476	569
Vacant Sites in Single-Family Zones (Table VI-46)	0	0	109	109
Accessory Dwelling Unit (ADU) Potential	266	8	116	390
Sites Suitable to Address the Lower-Income RHNA (Table VI-52)	556	164	125	845
Other High-Density Sites (Table VI-53)	393	197	196	786
Total Units	1,273	404	1,031	2,708
RHNA Target	1,155	334	578	2,067
Surplus Units	118	70	453	641
Surplus Percent	10.2%	21%	78.4%	31%

~~INCOME GROUP~~	~~TOTAL RHNA~~	~~UNITS BUILT SINCE 6/30/21~~	~~ENTITLED AND PENDING HOUSING UNITS 3/31/25~~	~~PROJECTED ACCESSORY DWELLING UNITS~~	~~UNITS ON VACANT SITES WITH SUITABLE ZONING (TABLE VI-44)~~	~~UNITS ON VACANT SITES NEEDING ZONING CHANGES (SITE 1 TABLE VI-50)~~	~~UNITS ON NON-VACANT SITES SUITABLE TO ADDRESS LOWER-INCOME RHNA (TABLE VI-50)~~	~~ANTICIPATED ADDITIONAL CAPACITY OF OTHER APPROPRIATE SITES (TABLE VI-51)~~	~~TOTAL CAPACITY~~	~~SURPLUS RHNA~~	~~SURPLUS RHNA PERCENT~~
~~Extremely Low~~	~~757~~	~~0~~	~~1~~ ~~1~~ ~~3~~	~~45~~ ~~27~~ ~~130~~	~~0~~	~~70~~	~~522~~	~~533~~	~~1,332~~	~~177~~	~~15%~~
~~Very Low~~		~~0~~									
~~Low~~	~~398~~	~~0~~									
~~Moderate~~	~~334~~	~~0~~	~~1~~	~~6~~	~~0~~	~~0~~	~~205~~	~~266~~	~~478~~	~~144~~	~~43%~~
~~Above Moderate~~	~~578~~	~~9~~	~~22~~	~~89~~	~~109~~	~~0~~	~~286~~	~~379~~	~~894~~	~~316~~	~~55%~~
~~TOTAL~~	~~2,067~~	~~9~~	~~29~~	~~297~~	~~109~~	~~70~~	~~1,083~~	~~1,178~~	~~2,775~~	~~708~~	~~34%~~

Note: The income levels assigned to the ADUs approved since June 30, 2021 are based on the SCAG ADU affordability analysis.

Constructed Units

Since June 30, 2021, nine new housing units have received certificates of occupancy in the City of South Pasadena. All were unrestricted in income and have been assigned to the above moderate-income category. These units may be credited toward the RHNA.

Entitled and Pending Units

As of March 31, 2025, 569 housing units are in the development pipeline, with ~~active entitlements or applications or an immediately anticipated resubmittal of an expire entitlement.~~ **the statuses of with actively entitled, submitted building plan check applications, submitted ministerial approval applications, and nearly completed construction. The majority of pending units are within projects which have submitted their building plan check application. In the City of South Pasadena, buildings which receive building permits have, to the best of our knowledge, always been constructed and completed. Developers typically have obtained funding for their developments prior to submitting building plan check applications.**

The City maintains close communication with all of these applicants and believes that all intend to move forward with their projects. ~~Some have reprocessed or are reprocessing their entitlements due to the more permissive densities and development standards that have been or are being put in place currently by the City.~~ **There are no other known conditions that preclude development on these sites. The projects meeting this category are listed in Table VI-45.**

Table VI-45
ENTITLED AND PIPELINE PROJECTS

ADDRESS/ PROJECT NAME	APN	ACRES	STATUS	ZONE (FOR APPROVAL)	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	TOTAL NUMBER OF DWELLING UNITS	DENSITY
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Entitled in 2021; ~~active entitlement~~ Currently under building plan check review	MSSP and RM	Office building Three parcels were consolidated	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses (restaurant and retail).	0	0	60	60	45 du/acre in MSSP portion 9 du/acre in RM portion
Mission Bell 1101, 1107, 1115 Mission St	5315-008-045 5315-008-043	0.72	Entitled in 2021; ~~resubmittal sought; preapplication consultations in 2024; resubmittal anticipated in 2025 upon adoption of new height limit~~ re-entitled in 2025. Currently under building plan check review	MSSP / DTSP – Mixed Use Core	A portion of the existing building to be demolished and the other portion adaptively reused. New buildings will be added too. Several parcels were consolidated.	Mixed-use. The 8 lower income units are covenented in the approved entitlement.	8	0	67	75	104 du/ac
School District Mixed-Use 1020 El Centro Street	5315-008-047	1.90	~~Building permit granted in 2024.~~ Building permit for street fronting commerical improvements granted in 2024. Current owner in the process of selling approved entitlement for mixed-use housing on the site.	MSSP	School district offices, parking lot	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses. The 19 moderate income affordable units are covenanted affordable per the approved entitlement.	0	19	89	108	57 du/ac
625 Fair Oaks Senior Housing	5315-001-070 5315-001-072 5315-002-061 5315-002-062	2.80 (of total 3.93 ac site)	Re-entitled in 2024~~;~~ under building plan check review	DTSP – Fair Oaks Corridor	Commercial retail with underutilized parking lot, office building parking lots, single-family residences, four-story office building (to remain)	Senior housing with 165 independent living units, 72 assisted living and memory care beds, 50 on-site affordable units in separate building, complementing existing four-story office building. The 100% affordable 50 unit building is covenanted 100% affordable in the approved entitlement.	50	0	165	215	77 du/ac (does not include assisted living)
Carrows Site 815 Mission Street	5315-009-051	0.81	Entitled in 2021; ~~resubmitted in 2024, currnetly under review~~ re-entitled in 2025, currently under building plan check review	DTSP – Mixed Use Core	Single-story restaurant and surface parking	Mixed-use condominium project. The 9 moderate income affordable units are covenanted affordable per the approved entitlement.	0	9	47	56	69 du/ac
181-187 Monterey Road	5311-015-035 5311-010-001 5311-010-002	1.26	Currently under review for ministerial approval. Developer is merging lots and is preparing a new condominium map for the City, with ministerial approval anticipated immediately after.	HO Overlay	Single-family home	Condominium project at base of hillside; hillside portion of property largely preserved. The 7 moderate income affordable units are covenanted affordable per the approved entitlement.	0	7	44	51	40 du/ac
1612 Spruce Street	5320-008-030	0.4	Entitled in 2019. Construction nearly complete.	HO Overlay	Single family home, vacant lot	Four above market rate detached townhomes	0	0	4	4	9.9 du/ac
TOTAL							58	35	476	569	

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~~*Availability of Sites for Housing*~~ *Available Sites*

To properly plan for the current planning period and future housing needs, land available for housing within the existing City boundaries has been inventoried. Land available for development in South Pasadena is scarce. To respond to the needs for additional housing capacity and comply with Program 3.a, the City has adopted a Downtown Specific Plan covering the former Mission Street Specific Plan area and the Fair Oaks Corridor, a Mixed-Use Overlay on parcels zoned CG, CO and BP, a Housing Opportunity Overlay on certain parcels zoned RH and RM, and ~~an Institutional Housing Overlay on certain properties~~ **rezoning of certain parcels zoned CF to CF-50.**

With completion of the rezones~~**, To properly plan for the current planning period and future housing needs, land available for housing within the existing City boundaries has been inventoried. Land available for development in South Pasadena is scarce.**~~ o~~O~~pportunities for residential development in South Pasadena fall into the following categories:

- Vacant and non-vacant land in the ~~**Commercial General (CG), Mission Street Specific Plan (MSSP), Business Park (BP), Community Facilities (CF), aand Residential Medium-Density (RM) and Residential High-Density (RH) zones that is proposed for an Affordable Housing Overlay at 30 du/acre or redesignation and rezoning to Mixed-Use, Ostrich Farm Zone, Downtown Mission, Downtown Fair Oaks, or as part of the General Plan and the Downtown Specific Plan (DTSP) updates which will permit mixed-use development with commercial uses on the ground level and high-density residential uses on the upper levels as well as multifamily residential**~~, **Downtown Specific Plan (DTSP), Mixed-Use, Housing Opportunity Overlay and** ~~Institutional Housing Overlays~~ **CF-50 zone, which will permit multifamily residential and** ~~**which**~~ would accommodate development of lower-income affordable housing as well as moderate and above-moderate income housing.
- ~~**Vacant land in the RM and RH zones along with smaller vacant parcels in the CG and MSSP zones that could be developed for moderate-income housing. S To make these sites eligible for affordable housing, some of these parcels would be included in the Affordable Housing Overlay with new zoning that allows greater density and flexibility after adoption of the updated General Plan and DTSP; sites are assumed for moderate-income units for the Housing Element analysis if they are smaller than 0.5 acres.**~~
- Parcels throughout South Pasadena that allow residential uses that could be developed with accessory dwelling units (ADUs) that are expected to provide housing at various affordability levels.
- Vacant lots in the Altos de Monterey Residential (AM), Residential Estate (RE), and Residential Low-Density (RS) zoning districts, which could be developed with above-moderate income housing.

All sites discussed in this section are shown on maps in Appendix A of this Housing Element.

~~*Sites Inventory*~~ *Vacant Sites in Single-Family Residential Zones*

Table VI-4~~6~~4 describes the vacant sites remaining in the City that ~~**can accommodate residential development**~~ **within the Altos de Monterey Residential (AM), Residential Estate (RE) and**

Residential Low-Density (RS) zoning districts. All these sites are suitable for development of ~~moderate and~~ above-moderate income residential development. ~~One available vacant site is larger than 0.5 acres and proposed for redesignation and rezoning to allow greater than 30 dwelling units per acre (du/ac.) so it is included in Table VI-50, which lists sites suitable for addressing the lower-income Regional Housing Needs Allocation (RHNA).~~

In determining the realistic unit capacity for sites listed in Table VI-4**64** that could accommodate more than one unit per parcel, a realistic assumption of 80 percent of maximum allowed density was used to estimate a realistic number of dwelling units that would likely develop on each parcel. This is based on the development standards and historic development trends on vacant sites in these zoning districts. Table VI-47~~45~~ presents recent projects in medium and lower density areas of the City that support the 80 percent assumption. All of the projects exceeded 80% of allowed unit capacity. It should also be noted that ~~90 percent of the sites in Table VI-45 are in the RS zoning district and as such have only been able to accommodate a maximum of one unit per parcel until the recent adoption~~ many of these parcels also qualify for~~of~~ SB 9, which allows ~~duplex development~~ urban lot splits on single-family parcels statewide.

~~A small number of the sites in this table are in nonresidential zones. The changes to allow greater density on many nonresidential sites and incentivize housing development via the City's inclusionary regulations will further encourage housing development on non-residentially zoned properties. The realistic development capacity for each site can be increased with approval of a density bonus as part of a development application. Zoning Code provisions applicable to the zoning district for each site, as described in the Constraints section, were assumed and no density bonuses or the inclusionary housing regulations were applied. This is for consistency with state guidance as stated in the HCD 2020 Housing Element Site Inventory Guidebook:~~

~~"The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."~~

~~*Suitability of Non-Vacant Sites*~~

~~As shown in Table VI-44, many of the sites suitable for residential development are non-vacant. Non-vacant sites provide additional constraints on development due to the fact that non-vacant sites have existing uses that would likely be disrupted with development of the site with residential uses.~~

~~Under the current zoning code, South Pasadena has received multiple development applications for residential development of non-vacant sites. A couple of recent examples are included as identified sites in Appendix A, including the Carrow's Site (Site 11 in Appendix~~

~~A), which was approved by the Planning Commission on April 18, 2022, and the School District Site (Site 10 in Appendix A), which was approved by the Planning Commission on September 13, 2022. In addition to these sites, two additional mixed-use projects have been approved on sites with existing uses. The Mission Bell project, approved in 2020, consists of 36 residential units and approximately 7,400 square feet of commercial space. The Seven Patios, approved in 2021, consists of 57 residential units and approximately 6,100 square feet of commercial space. Development applications for these two projects were submitted prior to the City's adoption of its Inclusionary Housing Ordinance, and therefore do not include any affordable units so are not included in the list of identified sites in Appendix A.~~

~~In addition to these recent approvals of non-vacant sites under the City's existing zoning code and approval process, Programs 2.a, 2.e, and 2.km, 2.ln, 3.b, 3.c, and 3.l are all intended to encourage redevelopment of non-vacant sites. In part, these programs will ease the development standards and ensure proposed projects are considered by the City in a more timely manner than projects have been considered in the past. With these changes, it is anticipated that the redevelopment of non-vacant sites will become more likely.~~

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Table VI-464
VACANT ~~AND NONVACANT~~ SITES THAT ALLOW RESIDENTIAL DEVELOPMENT FOR MODERATE AND ABOVE-MODERATE

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
End of Rollin St.	91030	5314026050	Very Low Density Neighborhood	AM	N/A	1 unit per parcel	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
La Portada St. at Via del Rey	91030	5314025021	Very Low Density Neighborhood	AM	N/A	1 unit per parcel	0.75	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa St.	91030	5311009056	Very Low Density Neighborhood	AM	N/A	1 unit per parcel	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009057	Very Low Density Neighborhood	AM	N/A	1 unit per parcel	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Cielo at Santa Teresa	91030	5311009058	Very Low Density Neighborhood	AM	N/A	1 unit per parcel	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camino del Cielo at Santa Teresa	91030	5311009055	Very Low Density Neighborhood	AM	N/A	1 unit per parcel	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015034[3]	Very Low Density Neighborhood	RE	N/A	3.5	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311015033[3]	Very Low Density Neighborhood	RE	N/A	3.5	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010030[3]	Very Low Density Neighborhood	RE	N/A	3.5	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave at Blair Ave.	91030	5311010029[3]	Very Low Density Neighborhood	RE	N/A	3.5	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave at Blair Ave.	91030	5311010028[3]	Very Low Density Neighborhood	RE	N/A	3.5	2.37	Vacant	YES - Current	Privately Owned	Available	0	0	6	6
Bank St. at Meridian Ave.	91030	5314020007	Very Low Density Neighborhood	RS~~E~~	N/A	3.5	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032044	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Illinois Dr. at Hanscom Dr.	91030	5308019034	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031001	Low Density Residential	RS	N/A	6	0.10	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308023015	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310022006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017021	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Warwick Ave. at Saint Albans Ave.	91030	5311017020	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308032006	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023008	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Brunswick Ave.	91030	5311015016	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023019	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022003	Low Density Residential	RS	N/A	6	0.11	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308022042	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Short Way St. at Oak Hill Ave.	91030	5312031029	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave at Oak Crest Ave.	91030	5314010005	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026010	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Illinois Dr.	91030	5308024017	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308023007	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308022002	Low Density Residential	RS	N/A	6	0.12	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Mountain View Ave. at Alta Vista Ave.	91030	5314010024	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Hanscom Dr. at Illinois Ave.	91030	5308021012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Meridian Ave. at Foothill St.	91030	5317009032	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Hanscom Dr. at Peterson Ave.	91030	5308032012	Low Density Residential	RS	N/A	6	0.13	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311008033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015006	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308024033	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Bonita Dr. at Oneonta Dr.	91030	5310034030	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hanscom Dr. at Hill Dr.	91030	5308002070	Low Density Residential	RS	N/A	6	0.14	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Oneonta Dr. at Bonita Dr.	91030	5310026011	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Saint Albans Ave. at Warwick Ave.	91030	5311006013	Low Density Residential	RS	N/A	6	0.15	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Alta Vista Ave.	91030	5314008014	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Blair Ave. at Saint Albans Ave.	91030	5311017058	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Camden Ave. at Camden Parkway	91030	5321011013	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Brunswick Ave. at Saint Albans Ave.	91030	5311006900	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Saint Albans Ave. at Blair Ave.	91030	5311015005	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5314006020	Low Density Residential	RS	N/A	6	0.16	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031041	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Kolle Ave. at Monterey Rd.	91030	5311007019	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Cambridge Pl. at Valley View Rd.	91030	5310018025	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	State-Owned	Available	0	0	1	1
Brunswick Ave. at Kolle Ave.	91030	5311006024	Low Density Residential	RS	N/A	6	0.17	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031040	Low Density Residential	RS	N/A	6	0.18	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Indiana Ave. at Indiana Pl.	91030	5311014048	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Ave.	91030	5308031039	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Hill Dr. at Collis Ave.	91030	5312017025	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Alta Vista Ave. at Indiana Ave.	91030	5314007017	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
End of Bank St.	91030	5314019023	Low Density Residential	RS	N/A	6	0.19	Vacant	YES - Current	Privately Owned	Available	0	0	1	1
Peterson Ave. at Hanscom Dr.	91030	5308031042	Low Density Residential	RS	N/A	6	0.20	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Saint Albans Ave. at Blair Ave.	91030	5311008039	Low Density Residential	RS	N/A	6	0.21	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Camino del Sol at Las Palmitas St.	91030	5308002072	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014042	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Warwick Pl. at South Ln.	91030	5311006028	Low Density Residential	RS	N/A	6	0.22	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Rollin St. at Meridian Ave.	91030	5314017027	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	State-Owned	Available	0	0	2	2
Alta Vista Cir. at Indiana Ave.	91030	5314006005	Low Density Residential	RS	N/A	6	0.23	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Ave. at Pinecrest Dr.	91030	5311006057	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024034	Low Density Residential	RS	N/A	6	0.25	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Indiana Ave. at Indiana Pl.	91030	5311014043	Low Density Residential	RS	N/A	6	0.26	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Braewood Ct.	91030	5314016077	Low Density Residential	RS	N/A	6	0.28	Vacant	YES - Current	Privately Owned	Available	0	0	2	2

ADDRESS/INTERSECTION	ZIP CODE	APN	GENERAL PLAN LAND USE	ZONING	MINIMUM DENSITY ALLOWED (UNITS/ACRE)	MAXIMUM DENSITY ALLOWED (UNITS/ACRE)	PARCEL SIZE (ACRES)	EXISTING USE/ VACANCY	INFRASTRUCTURE	OWNERSHIP	SITE STATUS[1,4]	LOWER INCOME CAPACITY	MODERATE INCOME CAPACITY	ABOVE MODERATE CAPACITY	TOTAL CAPACITY
Hanscom Dr. at Illinois Dr.	91030	5308020027	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Alta Vista Cir. at Alta Vista Ave.	91030	5314005045	Low Density Residential	RS	N/A	6	0.29	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Oak Hill Pl. at Oak Hill Ln.	91030	5312020012	Low Density Residential	RS	N/A	6	0.30	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Hanscom Dr. at Illinois Dr.	91030	5308024031	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Indiana Terrace	91030	5314005021	Low Density Residential	RS	N/A	6	0.32	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
End of Indiana Terrace	91030	5314005017	Low Density Residential	RS	N/A	6	0.35	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Brunswick Ave. at Oak Hill Terrace	91030	5311006055	Low Density Residential	RS	N/A	6	0.37	Vacant	YES - Current	Privately Owned	Available	0	0	2	2
Peterson Ave. at Hanscom Dr.	91030	5308031053	Low Density Residential	RS	N/A	6	0.72	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
Bank St. at Meridian Ave.	91030	5314018010	Low Density Residential	RS	N/A	6	0.73	Vacant	YES - Current	Privately Owned	Available	0	0	3	3
ABOVE-MODERATE SUBTOTAL							**17.41**					**0**	**0**	**109**	**109**
TOTAL							**17.41**					**0**	**0**	**109**	**109**

Source: City of South Pasadena, 2021

Note 1: Available means the site has not been entitled for development

Note 2: These four parcels have the same owner and are for sale. The City has recently received developer interest in developing residential units on these parcels as one project.

Note 3: These parcels are part of a potential project to develop duplexes and townhouses on all of these parcels by the same developer who has purchased all of the parcels. The City has confirmed that there is access to this set of parcels. The parcels include 10 vacant parcels and one nonvacant parcel.

Note 4: There are no known environmental constraints.

Table VI-475
REPRESENTATIVE MEDIUM AND LOWER DENSITY PROJECTS IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	BUILT DENSITY	PERCENT OF ALLOWED CAPACITY
1974 Huntington Drive	5321008016	.24	Under Construction	RM	Duplex	Market rate 3-unit ownership project	3	12.5 du/acre	>100%
1413 Lyndon	5319003004	.20	Completed in 2016	RM	Single-family home	Market rate 3-unit ownership project	3	10 du/acre	> 100%
191 Monterey Rd.	5311010022	.70	Completed in 2017	RM	Single-family home	Market rate 9-unit ownership project	9	12.9 du/acre	92%
1818 Peterson Ave.	5508025027	.09	Entitled in 2021	RS	Vacant	Market rate 1,231 sf Single-family dwelling with 495 sq. ft. JADU	2	11.1 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)
807 Rollins St.	5314017901	.23	Entitled in 2021	RS	Vacant	Market rate 3411 sf Single-family dwelling, (JADU-ready, entitled in April 2022)	1	4.3 du/acre	100% (one primary unit per parcel allowed without an SB 9 unit)

Source: City of South Pasadena, 2022

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Accessory Dwelling Unit Potential

In the last five years, ADUs have become more broadly allowed under California law. The City's local zoning regulations have been updated regularly to reflect those changes to state law. Beginning in 2017, the City has seen steady increases year over year in permitted ADUs each year. Before 2017, no ADUs were permitted. Local interest in ADUs is significant. ADU building permit numbers from 2017 through the first half of 2022 are listed below. **Since 2022, the number of ADUs receiving building permits stabilized.**

- 2017 – 1 ADU received a building permit
- 2018 – 4 ADUs received building permits
- 2019 – 7 ADUs received building permits
- 2020 – 8 ADUs received building permits
- 2021 – **20** ADUs received building permits
- **2022 - 48 ADUs receiving building permits**
- **2023 – 50 ADUs receiving building permits**
- **2024 – 49 ADUs receiving building permits**

The 6th cycle projection period (the timeframe when units can be counted towards the City's RHNA) began June 30, 2021, and extends to October 15, 2029. The City issued 9 building permits for ADUs in the second half of 2021 and 28 building permits for ADUs through December 31, 2021. (see Table VI-4~~6~~). The City's projection for permit issuances starting at the beginning of 2022 through the end of the projection period is provided in Table VI-4~~6~~. (See also Appendix E for more detailed analysis). The projection assumes that ADU permits will increase at a similar rate to the increase from 2017 through 2022, as shown above, through the first half of and in 2023 because of the updated State laws and Municipal Code supported by the City's efforts to facilitate ADU production. After that, the City projects that applications will level off over the following years. This supports the conservative assumptions in Table VI-4~~6~~ and the more vigorous assumptions in Table VI-4~~7~~.

Table VI-4~~6~~
ACCESSORY DWELLING UNIT PROJECTION

Year	ADU Planning Permits	ADU Building Permits
2020 - Actual	17	8
2021 - Actual	62	19
Issued from June 30 through December 31 2021 (Actual)	28	9
Issued from January 1 through June 30 2022 (Actual)	50	29
Remainder of 2022	50	29

2023	55	39
2024	55	39
2025	65	39
2026	68	39
2027	68	39
2028	68	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	470	320[1]

[1] In order to remain consistent with the public's and HCD's understanding of the City's approach for the RHNA forecast and the housing program, the City will continue to use the figure of 297 units for those purposes, as projected in earlier public review drafts, see Appendix E for a more detailed analysis of ADU projections.

As detailed in the Housing Plan under Goal #3, additional efforts are planned to encourage and support ADU applications, also contributing to the assumption of an additional 297 ADU permits between January 1, 2022, and October 15, 2029. Although the City projects a higher number of ADUs than the conservative options for projecting ADUs in the HCD Sites Inventory Guidebook, the City's projections are more appropriate and realistic because current trends are based on recent Code changes, making it incorrect to base assumptions on earlier years when the Code did not allow ADUs on most properties.

Southern California Association of Governments (SCAG) prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena. The number of currently occupied ADUs in South Pasadena is too low to do a meaningful study. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that don't reach the rental market. Table VI-~~44~~52 provides the projected 297 ADUs broken down by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena. A survey of studio and one-bedroom rentals available in South Pasadena in August 2022 was conducted online. The average price for this type of unit was a 1 bedroom for $2,500/month. The lowest rental price was $1,995. The other three listings were higher. However, these listings only include those ADU units that are being rented at market prices, and do not include ADU units that are being rented to friends and family through private placements, which have been shown to often be at below-market rents that would be affordable to lower-income households. These rental listings reflect a point-in-time and are considered supplemental to the SCAG affordability analysis which was based on a much larger data set. The South Pasadena ADU regulations encourage this housing type and allow flexibility in their development. Additional detail about affordability assumptions are detailed in Appendix E. The City updated its ADU regulations in June 2021, and again in December 2021 to facilitate ADU production on historic properties or within historic districts; and will continue to comply with State law (see Program 3.f).

The City is also facilitating ADU production through other efforts detailed in Programs 3.f through 3.k that commit the City to promote and facilitate ADUs to support the development of a significantly increased number of ADUs during the 6th cycle.

Updated Analysis of Accessory Dwelling Unit Potential for July 2025 Housing Element:

The City has issued 156 building permits for ADUs between June 30, 2021 and December 31, 2024. The City expects an additional 48 ADUs per year for the 4.875-year remainder of the planning period, resulting in 234 additional ADUs and a total ADU projection of 390 units.

Southern California Association of Governments (SCAG) prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for South Pasadena. The number of currently occupied ADUs in South Pasadena is too low to do a meaningful study. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that don't reach the rental market. Table VI-44 provides the projected 390 ADUs broken down by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena. A survey of studio and one-bedroom rentals available in South Pasadena in August 2022 was conducted online. The average price for this type of unit was a 1 bedroom for $2,500/month. The lowest rental price was $1,995. The other three listings were higher. However, these listings only include those ADU units that are being rented at market prices, and do not include ADU units that are being rented to friends and family through private placements, which have been shown to often be at below-market rents that would be affordable to lower-income households. These rental listings reflect a point-in-time and are considered supplemental to the SCAG affordability analysis which was based on a much larger data set. The South Pasadena ADU regulations encourage this housing type and allow flexibility in their development. Additional detail about affordability assumptions are detailed in Appendix E. The City updated its ADU regulations in June 2021, and again in December 2021 to facilitate ADU production on historic properties or within historic districts; and will continue to comply with State law (see Program 3.f).

~~*Comparison of Site Inventory with RHNA*~~

~~**SCAG's 2021-2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-47. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.**~~

Table VI-4~~7~~
POSSIBLE HIGHER ACCESSORY DWELLING UNIT PROJECTION

YEAR	ADU PLANNING APPLICATIONS	ADU BUILDING PERMITS ISSUED	NOTES
2020	30	8	Actual
2021	45	21	Actual 150% increase in Planning applications; 400% increase in building permits. 71% of Planning-approved received building permits
Issued after June 30, 2021	28	9	Actual
2022	100	58	Assumption of same level of application for the remainder of 2022.
2023	55	41	Assumption of 2022 as a bubble, but increase in applications over 2021 and 75% moving forward to building permits. Assumption of 10% increase in applications and 75% moving forward to building permits. Assumption of strady application rate, no increase.
2024	60	45	
2025	66	50	
2026	72	54	
2027	72	54	
2028	72	54	
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022 – October 15, 2029	**560**	**403**	

To provide additional context, this projection scenario forecasts that less than 8 percent of South Pasadena's single-family housing stock (5,642 units in 2019) will add an ADU.

Suitability of Non-Vacant Sites

In accordance with Assembly Bill 1397, the site-specific details in Appendix A and the following discussion are included to demonstrate the feasibility of redeveloping sites addressing the lower-income RHNA with new multifamily homes.

Many of the sites suitable for residential development are non-vacant. Non-vacant sites provide additional constraints on development due to the fact that non-vacant sites have existing uses that would likely be disrupted with development of the site with residential uses. The City of South Pasadena is nearly built-out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of projects that include a portion or all of the project as residential units.

Under the current zoning code, South Pasadena has received multiple development applications for residential development of non-vacant sites. A couple of recent examples are included as identified sites in Appendix A, including the Carrows Site, which was approved by the Planning Commission on April 18, 2022, and the School District Site, which was approved by the Planning Commission on September 13, 2022. In addition to these sites, two additional mixed-use projects have been approved on sites with existing uses. The Mission Bell project, approved in 2020, consists of 36 residential units and approximately 7,400 square feet of commercial space. The Seven Patios, approved in 2021,

consists of 57 residential units and approximately 6,100 square feet of commercial space. Table VI-48 provides examples of previously built and entitled projects on non-vacant sites.

In addition to these recent approvals of non-vacant sites under the City's existing zoning code and approval process, Programs 2.a, 2.e, and 2.k, 2.l, 3.b, 3.e, and 3.l are all intended to encourage redevelopment of non-vacant sites. In part, these programs will ease the development standards and ensure proposed projects are considered by the City in a more timely manner than projects have been considered in the past. With these changes, it is anticipated that the redevelopment of non-vacant sites will become more likely.

~~***Market Trends***~~

~~**In early 2019, the City began a series of meetings to discuss housing issues with the community. The top issues and needs that came from those discussions were ADUs, inclusionary housing regulations, and tenant protections. Since then, the City has adopted ordinances related to all of those issues, including the recently updated ADU ordinance updates and the new inclusionary housing ordinance. The push for this focus on housing production has come from the community.**~~

~~**Multiple residential or mixed-use projects containing multifamily housing have been constructed or recently approved in South Pasadena (see Table VI-48 for representative projects). This is an increasing trend as three multifamily projects were approved in 2020 after only one project of this kind being approved in the eight years prior to 2020. These are all on sites that were previously developed. The Mission Bell project includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was the City's first state density bonus application. All the projects were able to achieve higher densities with a range from 22 to 50 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects. There are many additional examples in the region of projects containing multifamily housing on previously developed sites of various densities, unit sizes, and architectural styles, and trends in South Pasadena indicate that interest is growing and more such projects can be expected, particularly after adoption of the updated General Plan and DTSP.**~~

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Table VI-5048
REPRESENTATIVE PROJECTS ON NON-VACANT SITES IN SOUTH PASADENA

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE (FOR APPROVAL)	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION (AS APPROVED)	TOTAL NUMBER OF DWELLING UNITS	DENSITY (DU/ACRE)	PERCENT OF ALLOWED CAPACITY	SIMILAR SITES IN TABLE VI-520 (AND SITE ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	~~Buildout starting in Summer 2021 and concluding in Fall 2022.~~ Entitled in 2021; active entitlement	MSSP and RM	Office building Three parcels were consolidated	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses (restaurant and retail)	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor; MSSP density wa~~i~~s capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.45 FAR	Odd-shaped sites ~~near transit~~. Tyco site (4), ~~North side of Mission~~Meridian site ~~(, , 12~~(9) Site 14, combined with adjacent lots **Other sites near rail transit: City Yard (8~~);~~** ~~Fremont/Mission (12), Arco (8)~~ *These sites are similar in size and proximity to transit~~; identified for rezoning to produce more units than example project~~ and have similar constraints.*
Mission Bell 1101, 1107, 1115 Mission St	5315-008-045 5315-008-043	0.72	Entitled in 2021; resubmittal sought; preapplication consultations in 2024; resubmittal anticipated in 2025 upon adoption of new height limit~~Entitled in 2021~~	~~MSSP~~DTSP – Mixed Use Core	A portion of the existing building to be demolished and the other portion adaptively reused. New buildings will be added too. Several parcels were consolidated.	Mixed-use: ~~7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units on above and to the rear of the commercial uses.~~	75~~36~~	104~~50~~	~~98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor; MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project utilized 1.48 FAR~~148% of allowed density (achieved through density bonus)	~~School Site -11 (historic resource); Carrows site (11);~~ Parking Lot sites: 12, 13 (rectangular; several parcels combined) Sites with uses to retain: Business and Research Park parking lot site (2), Arroyo Vista Inn site (6), Methodist Church site (7), Meridian site (9) *These sites are similar in size to the Mission Bell project, with structures on a portion of the lot that could be incorporated into a larger project or demolished; identified for rezoning at higher densities to produce more units than example project.*
Carrows Site 815 Mission Street	5315-009-051	0.81	Entitled in 2021; resubmitted in 2024, currnetly under review	DTSP – Mixed Use Core	Single-story restaurant and surface parking	Mixed-use condominium project	56	69	99% of allowed density	Retail replacement: Pavilions parking lot (15)
Eight Twenty 820 Mission St.	5315-017-094, 5315-017-082, 5315-017-067, 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-Use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses	38	20	109% of allowed FAR (Allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Parking Lot sites -12 and 13 (rectangular; several parcels combined) *Like the example project, these properties are owned by parties interested in consolidating to build a larger multi-family project (some are City-owned); identified for rezoning to produce more units than example project.*
625 Fair Oaks Senior Housing	5315-001-070 5315-001-072 5315-002-061 5315-002-062~~5315-001-072~~	2.80 (of total 3.93 ac site)~~2.62~~	Re-entitled in 2024. ~~Entitled in Spring 2020~~	DTSP – Fair Oaks Corridor~~CO~~	Commercial retail with underutilized parking lot, office building parking lots, single-family residences, four-story office building (to remain)Commercial retail with underutilized parking lot	Senior housing with 165 independent living units, 72 assisted living and memory care beds, 50 on-site affordable units in separate building, complementing existing four-story office building~~Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density~~.	21~~86~~	77~~33~~	Original was 138% of allowed density (Allowed density ~~is~~ was 24 du/acre); new entitlement 86% of allowed density, but would be 114% of allowed density if assisted living and memory care beds were counted. FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks ~~(16, 17, 20, 21, 22~~15) Monterey Road Site (3) *These sites are similar in size and have owner interest in developing a residential project that would include on-site affordable housing and receive a density bonus. ~~One site is in consideration for affordable housing overlay zone for higher density.~~*

ADDRESS/ PROJECT NAME	APN	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	ZONE (FOR APPROVAL)	PREVIOUSLY DEVELOPED WITH/ EXISTING USES	PROJECT DESCRIPTION (AS APPROVED)	TOTAL NUMBER OF DWELLING UNITS	DENSITY (DU/ACRE)	PERCENT OF ALLOWED CAPACITY	SIMILAR SITES IN TABLE VI-52~~0~~ (AND SITE ID)
Mission Meridian Village Meridian Ave and Mission St	5315021001, 5315021079, 5315021047	1.6	Built in 2005	MSSP	Lower density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes: three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site ~~9~~10) Vacant Site/Ostrich Farm (1) Tyco Site (4) School District Site (10) *These are larger sites, in mixed-use areas, with potential for a project with multiple structures including affordable housing per the IHO; identified for rezoning to produce more units than example project.*

Source: PlaceWorks and City of South Pasadena, 2022**; The Arroyo Group, 2025**

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Regional Examples of Small Site Development

Some of the non-vacant sites included in the sites inventory consist of multiple parcels, some of which are smaller than 0.5 acres. Only sites that have strong potential for parcel assemblage or consolidation have been included in the inventory to address the lower income RHNA. (see Appendix A sites exhibits). Strong potential was determined from a combination of property owner interest and common ownership. All small sites made up of more than one parcel have common ownership except Site 12 which has one parcel owned by the City and one parcel owned by a private owner. The changes in zoning that will affect market conditions and will encourage redevelopment with housing are called for in Program 3.n and will include adoption of the Downtown Specific Plan. Nevertheless, there are successful regional examples of projects containing multifamily housing on parcels smaller than 0.5 acres. Table VI-5149 provides some of these examples in Pasadena and Santa Monica. These projects demonstrate the market trends to redevelop sites with existing buildings and construct multifamily units through applications with state density bonuses. All the projects were able to achieve higher densities with a range from 68 to 118 du/ac. without accounting for removal of the nonresidential portions of the project in the case of the mixed-use projects, and the conditions in South Pasadena are similar and anticipated to yield comparable results. In addition, the City expects more projects to come forward once the zoning and General Plan changes are adopted. The City has also included Program 3.d to encourage and facilitate parcel assemblage and work with developers and property owners who are interested in lot consolidation.

Table VI-5149
REPRESENTATIVE PROJECTS ON SMALL SITES IN REGION

ADDRESS/ PROJECT NAME	JURISDICTION	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY
Stanford Pasadena, 150 S. Oak Knoll	Pasadena	0.23	preliminary entitled 2017	Rental	19	83
Stanford Pasadena, 139 S. Oak Knoll	Pasadena	0.20	preliminary entitled 2017	Rental	16	80
233 Hudson	Pasadena	0.37	entitled 2018	Condo, 5,729 SF of retail/office	42	114
Pico Eleven, 1112 Pico Blvd	Santa Monica	0.44	finished 2018	Condo	32	73
1819 Pico	Santa Monica	0.49	preliminary entitled 2020	Condo, 4,174 SF of retail/office	48	98
3223 Wilshire	Santa Monica	0.45	constructed 2020	Rental, 5,418 SF of retail/office	53	118
2225 Broadway	Santa Monica	0.22	constructed 2020	Rental, 2,751 SF of retail/office	15	68

ADDRESS/ PROJECT NAME	JURISDICTION	ACRES	ENTITLED, UNDER CONSTRUCTION OR COMPLETED?	PROJECT DESCRIPTION	TOTAL NUMBER OF DWELLING UNITS	DENSITY
1450 Cloverfield	Santa Monica	0.45	constructed 2020	Rental, 8,385 SF of retail/office	34	76

Source: PlaceWorks, 2021

Sites to Address the Lower-Income RHNA

To provide adequate sites for the lower-income RHNA categories, in addition to the one vacant site mentioned above, a list of non-vacant sites have been identified as the most likely locations where additional lower-income housing could be built. Most of the sites also include units for moderate- and above-moderate income households (see Table VI-5**2**~~0~~). As with the one vacant site, all of these sites would either be affected by proposed changes to their General Plan Land Use designation or are included in an Affordable Housing Overlay in the draft General Plan update, including those sites that are within the boundaries of the draft DTSP. Zoning changes would follow adoption of these plans (see Program 3.a). The vacant and non-vacant sites to address the lower-income RHNA that are in need of General Plan and zoning changes to be suitable for lower-income development are all included in Table VI-5**2**~~0~~. Program 3.c addresses a requirement to replace units at sites on this list that have existing lower-income residential units on them when buildings are demolished.~~; and Programs 2.j and 2.k address the Affordable Housing Overlay~~.

In the fall of 2020, the City sent letters to or communicated directly with the property owners of all the properties in Table VI-5**2**~~0~~ about their interest in residential development on their property in the next three to eight years, in addition to many other properties identified as having potential to address the lower-income RHNA. In summer 2021, staff did a second round of outreach to property owners, including inserts in water bills, direct calls, and announcements at City Council and Planning Commission meetings, in the City's blog, and on the City's website. A copy of the letter the City sent can be found in Appendix C. The City followed up again with owners in the table who hadn't responded to the earlier rounds of outreach both via letter and phone calls in late 2021 and early 2022, yielding multiple additional responses. The detailed exhibits on each of these sites in Appendix A indicate whether or not a property owner responded. If a property owner responded that they were not interested in residential development, that site was removed from the Housing Element sites inventory. Where more detail about a property owner's plans or interest is available, that has been included in Appendix A. As owners of suitable properties inquire with staff about development potential, staff updates them on the City's policies and regulations, including the inclusionary housing ordinance, and suggests the property owner consider affordable housing. In addition to sites owned by the City, staff has solicited interest from property owners of approximately 16 properties on the inventory, as noted in Appendix A. Some of these have pending applications for projects that include residential units (also noted in Appendix A). In other cases, property owners or their representatives have had meetings with City staff to plan for applications following the City's adoption of the General Plan, DTSP and zoning code amendments.

Because projects on all of the sites included in Table VI-5**2**~~0~~ are eligible for the design incentives in the inclusionary housing requirement with provision of the required affordable housing units, the realistic capacity on these sites takes the requirement into consideration, pushing up the realistic capacity on nearly all these sites to 95 percent of the maximum proposed density once the density bonus units are added. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity. A slightly smaller number

of units was assumed on a small subset of the sites where full redevelopment was not a realistic assumption. On most of the sites, 60 percent of the units were assumed to address the lower-income RHNA and 40 percent are assumed for moderate- and above-moderate income units. The understanding that design incentives would be available alongside a significant State density bonus for projects on these sites supports the realistic capacity assumptions. Three of the sites included in Table VI-5**2**~~0~~ are proposed to receive the Affordable Housing Overlay (Sites 3, 6, and 7). Two of those sites are already designated and zoned for residential development (Sites 3 and 6).

Site 7, the Methodist Church Site is designated and zoned as Community Facilities. Part of the more than 6-acre site is already developed with non-residential community facility uses. Based on discussions with the owners about their interest in developing unused portions of the site for multifamily housing, the likelihood of development of undeveloped portions of the site with higher density residential has been established. In addition, all sites included in Table VI-**50**~~48~~ are examples of multifamily projects developed on sites designated to allow non-residential development.

The zoning amendments with development standards to implement the application of the ~~Affordable~~ Housing Opportunity Overlay or other zoning amendments to this site along with Sites 3 and 6 will ensure allowed heights and other development standards to accommodate feasible development of projects with at least 30 dwelling units per acre. ~~(see Programs 2.j and 2.k).~~ The unit assumptions on three of those sites (3, 6, and 7) are lower than 95 percent of the maximum allowed units under the proposed density and are based on discussions with property owners about expected numbers of units they would propose on those sites. Additional analysis of densities that are feasible within the City height limits is provided in Section 6.5.2 under Regulations Impacting Housing Supply. Additional detail on why 95 percent is a realistic capacity for these sites is provided in Appendix F.

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Table VI-5~~0~~
SITES SUITABLE TO ADDRESS THE LOWER-INCOME RHNA [1]

(entire table updated)

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT[2]
1	Pasadena Ave. at Sycamore Ave. – Vacant Site	91030	5311003096	70	0	0	70	Shortfall of Sites	1.05	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	BP with Mixed-Use Overlay	70	Vacant
2	Pasadena Ave. at Sycamore Ave.	91030	5311004010	50	20	13	83	Shortfall of Sites	2.23	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	BP with Mixed-Use Overlay	70	Non-Vacant
3	See pipeline site on parcel 5311010076. (181, 185 and 187 Monterey Rd.)														
4	Pasadena Ave. and Arroyo Dr.	91030	5313011007	35	16	8	59	Shortfall of Sites	0.89	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	BP with Mixed-Use Overlay	70	Non-Vacant
		91030	5313011009	13	6	3	22	Shortfall of Sites	0.34	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011010	10	4	2	16	Shortfall of Sites	0.24	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011012	40	17	10	67	Shortfall of Sites	1.00	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011013	32	14	7	53	Shortfall of Sites	0.80	Business Park/Research & Develop	BP			70	Non-Vacant
5	Monterey Rd. at Pasadena Ave.	91030	5311012019	19	8	4	31	Shortfall of Sites	0.55	General Commercial	CG	Ostrich Farm Mixed Use	BP with Mixed-Use Overlay	70	Non-Vacant
6	335 Monterey Rd.	91030	5311012040	0	0	7	7	Shortfall of Sites	0.78	Medium Density Residential	RM	Medium Density Neighborhood	RM	30	Vacant
7	ReNew United Methodist Church, 699 Monterey Rd.	91030	5314003083	30	0	0	30	Shortfall of Sites	6.65	Community Facilities	CF	Civic	CF with residential allowance	30	Non-Vacant
8	Between Mission St. and El Centro St. – Public Works Yard	91030	5315020901	47	0	0	47	Shortfall of Sites	0.71	Mission Street Specific Plan	MSSP	Mixed-Use Core	DTSP – Mixed-Use Core	70	Non-Vacant[3]
9	Mission St. at Meridian Ave.	91030	5315014030	6	3	2	11	Shortfall of Sites	0.23	Mission Street Specific Plan	MSSP	Mixed-Use Core	DTSP – Mixed-Use Core	70	Non-Vacant
		91030	5315014032	6	3	1	10	Shortfall of Sites	0.16	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014033	5	2	1	8	Shortfall of Sites	0.13	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014044	9	4	2	15	Shortfall of Sites	0.31	Mission Street Specific Plan	MSSP			70	Non-Vacant
10	See entitled site on parcel 5315008047. (Mission St. and Fairview Ave.)														
11	See pipeline site on parcel 5315009051. (Mission St. and Fremont Ave.)														
12	El Centro St. and Mound Ave.	91030	5315003044*	16	8	7	31	Shortfall of Sites	0.37	General Commercial	CG	Fair Oaks Corridor	DTSP - Fair Oaks Corridor	90	Non-Vacant
		91030	5315003901*	9	4	3	16	Shortfall of Sites	0.19	General Commercial	CG			90	Non-Vacant
13	El Centro St. and Mound Ave.	91030	5315003903	14	0	0	14	Shortfall of Sites	0.18	General Commercial	CG	Fair Oaks Corridor	DTSP - Fair Oaks Corridor	90	Non-Vacant
		91030	5315003904	10	0	0	10	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003902	10	0	0	10	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003035	15	0	0	15	Shortfall of Sites	0.19	General Commercial	CG				Non-Vacant

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT[2]
14	See entitled site on parcels 5315-001-070 and 5315-001-072. (Fair Oaks Ave. and Grevelia St.)														
15	Monterey Rd. and Fair Oaks Ave.	91030	5319002034	110	55	55	220	Shortfall of Sites	2.67	General Commercial	CG	Fair Oaks Corridor	DTSP - Fair Oaks Corridor	90	Non-Vacant
	TOTAL			556	164	125	845		19.91						

SITE NUMBER IN APPENDIX A	ADDRESS/ INTERSECTION	ZIP CODE	APN	LOWER-INCOME UNITS	MODERATE-INCOME UNITS	ABOVE MODERATE-INCOME UNITS	REALISTIC TOTAL CAPACITY (UNITS)	TYPE OF SHORTFALL	PARCEL SIZE (ACRES)	CURRENT GENERAL PLAN LAND USE	CURRENT ZONING	PROPOSED GENERAL PLAN DESIGNATION	PROPOSED ZONING	MAXIMUM DENSITY ALLOWED (UNITS/ ACRE)	VACANT/ NON-VACANT[2]
1	Pasadena Ave. at Sycamore Ave. – Vacant Site	91030	5311003096	70	0	0	70	Shortfall of Sites	1.05	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Vacant
2	Pasadena Ave. at Sycamore Ave.	91030	5311004010	50	20	13	83	Shortfall of Sites	2.23	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Non-Vacant
3	See pipeline site on parcel 5311010076. (181, 185 and 187 Monterey Rd.)														
4	Pasadena Ave. and Arroyo Dr.	91030	5313011007	35	16	8	59	Shortfall of Sites	0.89	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Non-Vacant
		91030	5313011009	13	6	3	22	Shortfall of Sites	0.34	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011010	10	4	2	16	Shortfall of Sites	0.24	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011012	40	17	10	67	Shortfall of Sites	1.00	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011013	32	14	7	53	Shortfall of Sites	0.80	Business Park/Research & Develop	BP			70	Non-Vacant
5	Monterey Rd. at Pasadena Ave.	91030	5311012019	19	8	4	31	Shortfall of Sites	0.55	General Commercial	CG	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
6	335 Monterey Rd.	91030	5311012040	14	6	7	27	Shortfall of Sites	0.78	Estate & Very Low Density Residential	RE	Ostrich Farm Mixed Use with AH Overlay	RE with AH Overlay	30	Vacant
7	ReNew United Methodist Church, 699 Monterey Rd.	91030	5314003083	30	0	0	30	Shortfall of Sites	6.65	Community Facilities	CF	Community Facilities with AH Overlay	CF with AH Overlay	30	Non-Vacant
8	Between Mission St. and El Centro St. – Public Works Yard	91030	5315020901	47	0	0	47	Shortfall of Sites	0.71	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant[3]
9	Mission St. at Meridian Ave.	91030	5315014030	9	5	2	16	Shortfall of Sites	0.23	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant
		91030	5315014032	7	2	2	11	Shortfall of Sites	0.16	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014033	5	2	2	9	Shortfall of Sites	0.13	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014044	13	6	2	21	Shortfall of Sites	0.31	Mission Street Specific Plan	MSSP			70	Non-Vacant
10	See entitled site on parcel 5315008047. (Mission St. and Fairview Ave.)														
11	See pipeline site on parcel 5315009051. (Mission St. and Fremont Ave.)														
12	El Centro St. and Mound Ave.	91030	5315003044*	16	8	7	31	Shortfall of Sites	0.37	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	55	Non-Vacant
		91030	5315003901*	9	4	3	16	Shortfall of Sites	0.19	General Commercial	CG			55	Non-Vacant
13	El Centro St. and Mound Ave.	91030	5315003903	14	0	0	14	Shortfall of Sites	0.18	General Commercial	CG	Downtown Fair Oaks	Mixed Use	70	Non-Vacant
		91030	5315003904	10	0	0	10	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003902	10	0	0	10	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003035	15	0	0	15	Shortfall of Sites	0.19	General Commercial	CG				Non-Vacant
14	See entitled site on parcels 5315-001-070 and 5315-001-072. (Fair Oaks Ave. and Grevelia St.)														

SITE NUMBER IN APPENDIX A															
15	Monterey Rd. and Fair Oaks Ave.	91030	5319002034	110	55	55	220	Shortfall of Sites	2.67	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	110	Non-Vacant
	TOTAL			564	167	127	858		19.91						
1	Pasadena Ave. at Sycamore Ave. – Vacant Site	91030	5311003096	70	0	0	70	Shortfall of Sites	1.05	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Vacant
2	Pasadena Ave. at Sycamore Ave.	91030	5311004010	50	20	13	83	Shortfall of Sites	2.23	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
3	181, 185 and 187 Monterey Rd.	91030	5311015035	0	0	8	8	Shortfall of Sites	0.34	Medium Density Residential	RM	Medium Density Residential with AH Overlay	RM with AH Overlay	30	Non-Vacant
		91030	5311010001	0	0	0	0	Shortfall of Sites	0.33	Medium Density Residential	RM			30	Non-Vacant
		91030	5311010002	0	0	0	0	Shortfall of Sites	0.59	Medium Density Residential	RM			30	Non-Vacant
4	Pasadena Ave. and Arroyo Dr.	91030	5313011007	35	16	8	59	Shortfall of Sites	0.89	Business Park/Research & Develop	BP	Ostrich Farm Mixed Use	Ostrich Farm Zone	70	Non-Vacant
		91030	5313011009	13	6	3	22	Shortfall of Sites	0.34	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011010	10	4	2	16	Shortfall of Sites	0.24	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011012	40	17	10	67	Shortfall of Sites	1.00	Business Park/Research & Develop	BP			70	Non-Vacant
		91030	5313011013	32	14	7	53	Shortfall of Sites	0.80	Business Park/Research & Develop	BP			70	Non-Vacant
5	Monterey Rd. at Pasadena Ave.	91030	5311012019	19	8	4	31	Shortfall of Sites	0.55	General Commercial	CG	Ostrich Farm Mixed Use	Ostrich Farm Zone	60	Non-Vacant
6	335 Monterey Rd.	91030	5311012040	0	0	7	7	Shortfall of Sites	0.94	Estate & Very Low Density Residential	RE	Estate & Very Low Density Residential with AH Overlay	RE with AH Overlay	30	Vacant
7	ReNew United Methodist Church, 699 Monterey Rd.	91030	5314003083	30	0	0	30	Shortfall of Sites	6.65	Community Facilities	CF	Community Facilities with AH Overlay	CF with AH Overlay	30	Non-Vacant
8	Between Mission St. and El Centro St. – Public Works Yard	91030	5315020901	42	0	0	42	Shortfall of Sites	0.71	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant[3]
9	Mission St. at Meridian Ave.	91030	5315014030	9	5	2	16	Shortfall of Sites	0.23	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	70	Non-Vacant
		91030	5315014032	7	2	2	11	Shortfall of Sites	0.16	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014033	5	2	2	9	Shortfall of Sites	0.13	Mission Street Specific Plan	MSSP			70	Non-Vacant
		91030	5315014044	13	6	2	21	Shortfall of Sites	0.31	Mission Street Specific Plan	MSSP			70	Non-Vacant
10	Mission St. and Fairview Ave.	91030	5315008047*	0	19	89	108	Shortfall of Sites	1.90	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
11	Mission St. and Fremont Ave.	91030	5315009051	5	0	45	50	Shortfall of Sites	0.81	Mission Street Specific Plan	MSSP	Downtown Mission	Mission Street	50	Non-Vacant
12	El Centro St. and Mound Ave.	91030	5315003044*	13	6	2	21	Shortfall of Sites	0.37	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	55	Non-Vacant
		91030	5315003901*	7	2	2	11	Shortfall of Sites	0.19	General Commercial	CG			55	Non-Vacant

13	El Centro St. and Mound Ave.	91030	5315003903	10	0	0	10	Shortfall of Sites	0.18	General Commercial	CG	Downtown Fair Oaks	Mixed Use	70	Non-Vacant
		91030	5315003904	8	0	0	8	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003902	7	0	0	7	Shortfall of Sites	0.12	General Commercial	CG				Non-Vacant
		91030	5315003035	11	0	0	11	Shortfall of Sites	0.19	General Commercial	CG				Non-Vacant
14	Fair Oaks Ave. and Grevelia St.	91030	5315001070	46	23	23	92	Shortfall of Sites	0.85	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	110	Non-Vacant
15	Monterey Rd. and Fair Oaks Ave.	91030	5319002034	110	55	55	220	Shortfall of Sites	2.67	General Commercial	CG	Downtown Fair Oaks	Fair Oaks	110	Non-Vacant
	TOTAL			592	205	286	1,083		24.89						

Source: City of South Pasadena, 2021/**2025**

* Included in prior Housing Element sites inventory

[1] See Appendix A for any identified environmental constraints that will be mitigated prior to residential development occurring.

[2]See Appendix A for site-by-site description of how redevelopment is likely in the planning period for each of these sites.

3 Site 8 has an underground gasoline tank and filling station on the site that will be removed and the City will remediate any soil contamination found on the site prior to development for residential uses. See Appendix A Site 8 for further discussion.

Other High-Density Sites

Many other sites within areas newly zoned for higher-density residential uses are also very developable. The areas rezoned for densities equal to or greater than 50 du/ac (DTSP – Mission West, Mixed-Use Core, and Fair Oaks Corridor zones, the Mixed-Use Overlay, and Housing Opportunity Overlay) are mainly characterized by one- and two-story, older commercial and residential buildings. Rather than assume that all sites will redevelop, or undertake a site-by-site analysis of developability, the City is estimating the likely redevelopment capacity of these areas by applying a probability of development to a large number of potential redevelopment sites, listed in Table VI-534. This method, known as the expected-yield definition of site capacity, is considered a best practice for Housing Element sites inventories.[22]

The following criteria guided the inclusion of sites in Table VI-53:

- **Properties must have been recently rezoned from a density of less than 50 du/ac to a density equal to or greater than 50 du/ac (DTSP, Mixed-Use Overlay and Housing Opportunity Overlay, Institutional Housing Overlay)**
- **Multifamily residential zones with no overlays are excluded from the calculation. While the RM and RH zones recently had their zoning capacities increased to 30 and 45 dwelling units per acre, respectively, the City is not assuming that these areas will redevelop, given that they contain much of the City's naturally occurring affordable housing.**
- **Properties that are historic landmarks or within historic districts are excluded. Although development is certainly possible within these districts, projects in these areas are required to be reviewed by the City's Cultural Heritage Commission and are required to fulfill certain requirements as described in Section 6.5.2, *Governmental Constraints,* of the Housing Element.**

Table VI-53 assumes a 7.5% probability of development, which is based on historical development rates of cities in similar situations to South Pasadena, and consistent with certified Housing Element assumptions made by similar jurisdictions for the 6th Cycle. Historical parallels include:

- **A retrospective analysis of 5th Cycle Housing Element sites in the San Francisco Bay Area found that roughly 10% of Housing Element sites were ultimately redeveloped into housing.**

Pasadena – The experience of South Pasadena's closest peer area after its rezoning is the strongest parallel. In 1994, the City of Pasadena adopted a General Plan which widely permitted mixed-use development in its downtown for the first time. In the thirty-one years since, approximately 29.1% of the non-historic, high-density zoned land has redeveloped into high-density mixed-use or multifamily residential use. This historical performance translates to 0.94% probability of development for any one site in one year. ~~or a 7.5% probability of development over an eight-year Housing Element cycle.~~ **However, a closer look reveals that the majority of this growth took place in the first 10 years after the area was widely zoned for high-density mixed-use, between 1994 and 2004. Within these ten years, the annual development probability was 1.6%, double the rate of development in the following years. This is likely because landowners who**

[22] Sidarth Kapur, Salim Damerdji and Christopher Elmendorf, "What Gets Built on Sites That Cities "Make Available" for Housing?" UCLA Report, https://escholarship.org/uc/item/6786z5j9, 2021.

purchased under earlier, lower-density zoning had a lower land basis, making development more feasible. This same pattern is seen in many other areas with strong market fundamentals, where "low-hanging fruit" are developed rapidly after a rezoning. The 1.6% annual development probability equates to a 8% development probability over the five remaining years in the Housing Element cycle. Pasadena's Central District is an excellent parallel to South Pasadena's growth districts because:

- Since 1994, it has been zoned at densities between 48 and 87 du/ac, very similar to South Pasadena's 50 to 90 du/ac.
- The city is adjacent to South Pasadena and part of the same region, with similar demographics and market conditions.
- The area was mostly populated with commercial uses, with some residential, similar to the growth districts in South Pasadena. A certain number of these commercial sites may have had current leases, environmental issues, or other development barriers, but these would occur in roughly the same proportion as sites in South Pasadena.
- Downtown Pasadena includes several large religious congregation properties, similar to the ~~Institutional Housing Overlay~~ CF-50 properties which are all two acres or greater and characterized by institutions which have large parking lots and excess space compared to their current membership or enrollment. In Pasadena, several of these have seen redevelopment into mixed-income housing.
- Many sites are proximate to the Metro A Line. However, some sites are up to a mile away from the nearest A Line station, similar to Ostrich Farm or Huntington Drive.
- There are significant historic districts and resources in both jurisdictions; as Table VI-53~~4~~ excludes these districts and resources in South Pasadena, the Pasadena analysis also excludes historic districts and resources in its jurisdiction.

Certified Housing Element probability parallels include:

- Sacramento – The City of Sacramento assumed a total development probability of 10-25%, and a residential development probability of 4-20% (average 8.5%) for "Tier 2" sites in its sites inventory. These sites corresponded to sites that, according to the 6th Cycle Housing Element, "were generally underutilized based on the existing use to the full development potential, but less likely to develop during the planning period. Tier 2 sites often had an existing business or were considered less prime residential sites based on location or adjacent uses." The most likely sites were considered "Tier 1" sites. The residential market in South Pasadena is much stronger than in Sacramento, as evidenced by its average home value of $1.62 million, compared to $468,000 in the state capital. This justifies an even higher assumption.

Table VI-5~~1~~

~~DOWNTOWN SPECIFIC PLAN REZONING CAPACITY ANALYSIS~~ OTHER REDEVELOPABLE SITES ANTICIPATED CAPACITY ANALYSIS

(redline indicates number that has changed from the 5/2023 Housing Element; some sites which are no longer zoned at 50+ du/ac have been eliminated)

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5311-001-018	MU Overlay	0.35	0	70	13	6	6	25	7.5%	**7.5%**	**0.9**	**0.5**	**0.5**	**1.9**
5311-001-038	MU Overlay	0.72	0	70	25	12	13	50	7.5%	**7.5%**	**1.9**	**0.9**	**0.9**	**3.8**
5311-001-041	MU Overlay	0.59	8	70	17	8	8	33	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.5**
5311-002-050	HO Overlay	0.15	1	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5311-002-051	HO Overlay	0.30	5	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5311-002-059	HO Overlay	1.86	19	70	56	27	28	111	7.5%	**7.5%**	**4.2**	**2.1**	**2.1**	**8.3**
5311-002-138	MU Overlay	0.75	0	70	26	13	13	52	7.5%	**7.5%**	**2.0**	**1.0**	**1.0**	**3.9**
5311-002-139	MU Overlay	1.06	0	70	37	18	19	74	7.5%	**7.5%**	**2.8**	**1.4**	**1.4**	**5.6**
5311-003-026	HO Overlay	0.02	0	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5311-003-027	HO Overlay	0.37	8	70	9	4	5	18	7.5%	**7.5%**	**0.7**	**0.3**	**0.3**	**1.4**
5311-003-028	HO Overlay	0.29	4	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5311-003-029	HO Overlay	0.03	0	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5311-003-030	HO Overlay	0.23	3	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5311-003-031	HO Overlay	0.20	1	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5311-003-032	HO Overlay	0.02	0	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5311-003-033	HO Overlay	0.18	3	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5311-003-034	HO Overlay	0.19	5	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5311-003-035	HO Overlay	0.20	5	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5311-003-036	HO Overlay	0.20	2	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5311-003-037	HO Overlay	0.49	21	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5311-003-038	HO Overlay	0.32	8	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5311-003-039	HO Overlay	0.26	8	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5311-003-040	HO Overlay	0.26	1	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5311-003-043	MU Overlay	1.94	3	70	67	33	33	133	7.5%	**7.5%**	**5.0**	**2.5**	**2.5**	**10.0**
5311-003-043	MU Overlay	0.39	0	70	14	7	7	28	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.1**
5311-004-011	MU Overlay	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5311-004-012	MU Overlay	0.08	0	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5311-004-013	MU Overlay	0.05	0	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5311-004-014	MU Overlay	0.08	0	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5311-004-015	MU Overlay	0.23	0	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5311-004-018	HO Overlay	0.51	16	70	10	4	5	19	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5311-004-019	HO Overlay	0.28	1	70	9	4	5	18	7.5%	**7.5%**	**0.7**	**0.3**	**0.3**	**1.4**
5311-004-020	HO Overlay	0.46	18	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5311-004-023	HO Overlay	0.26	2	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5311-004-026	HO Overlay	0.77	1	70	27	13	13	53	7.5%	**7.5%**	**2.0**	**1.0**	**1.0**	**4.0**
5311-004-027	HO Overlay	0.27	2	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5311-004-030	HO Overlay	0.45	1	70	15	7	8	30	7.5%	**7.5%**	**1.1**	**0.6**	**0.6**	**2.3**
5311-004-044	MU Overlay	0.36	0	70	13	6	6	25	7.5%	**7.5%**	**0.9**	**0.5**	**0.5**	**1.9**
5312-002-002	HO Overlay	0.16	7	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5312-002-003	HO Overlay	0.16	7	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5312-002-004	HO Overlay	0.13	4	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5312-002-005	HO Overlay	0.03	0	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5312-002-006	HO Overlay	0.15	4	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5312-002-023	HO Overlay	0.14	3	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5312-002-007	HO Overlay	0.12	0	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5312-002-008	HO Overlay	0.12	0	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5312-002-009	HO Overlay	0.12	0	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5313-004-026	DTSP MUC	0.19	0	**50**	**5**	**2**	**2**	**9**	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5313-004-054	DTSP MUC	0.21	0	**50**	**5**	**2**	**3**	**10**	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5313-004-055	DTSP MUC	0.40	0	**50**	**10**	**5**	**5**	**20**	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.5**
5313-006-024	DTSP MUC	0.44	0	**50**	**11**	**5**	**6**	**22**	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.7**
5313-006-025	DTSP MUC	0.50	0	**50**	**13**	**6**	**6**	**25**	7.5%	**7.5%**	**0.9**	**0.5**	**0.5**	**1.9**
5313-006-038	DTSP MUC	0.17	0	**50**	**4**	**2**	**2**	**8**	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5313-006-039	DTSP MUC	0.17	0	**50**	**4**	**2**	**2**	**8**	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313-006-040	DTSP MUC	0.10	2	50	2	0	1	3	7.5%	7.5%	0.1	0.1	0.1	0.2
5313-006-042	DTSP MUC	0.18	0	50	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5313-006-043	DTSP MUC	0.18	0	50	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5313-006-044	DTSP MUC	0.18	0	50	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5313-007-040	DTSP MUC	0.16	0	50	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-007-041	DTSP MUC	0.15	0	50	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-007-042	DTSP MUC	0.15	0	50	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-007-043	DTSP MUC	0.16	0	50	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-007-044	DTSP MUC	0.15	0	50	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-007-045	DTSP MUC	0.15	0	50	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-007-054	DTSP MUC	0.16	0	50	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-007-057	DTSP MUC	0.31	0	50	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5313-007-067	DTSP MUC	0.31	0	50	8	3	4	15	7.5%	7.5%	0.6	0.3	0.3	1.1
5313-008-013	DTSP MUC	0.15	1	50	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5313-008-014	DTSP MUC	0.15	1	50	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5313-008-015	DTSP MUC	0.24	0	50	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5313-008-016	DTSP MUC	0.22	0	50	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5313-008-026	DTSP MUC	0.17	2	50	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5313-008-027	DTSP MUC	0.12	0	50	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5313-008-028	DTSP MUC	0.14	0	50	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5313-010-021	HO Overlay	0.85	1	70	30	14	15	59	7.5%	7.5%	2.2	1.1	1.1	4.4
5313-010-047	HO Overlay	0.29	13	70	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5313-010-048	HO Overlay	0.35	8	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5313-010-049	HO Overlay	0.14	3	70	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5313-010-050	HO Overlay	0.20	6	70	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5313-010-051	HO Overlay	0.36	6	70	10	4	5	19	7.5%	7.5%	0.7	0.4	0.4	1.4
5313-010-052	HO Overlay	0.19	4	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5313-010-053	HO Overlay	0.19	5	70	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5313-010-054	HO Overlay	0.29	8	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5313-010-055	HO Overlay	0.15	3	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5313-010-056	HO Overlay	0.18	5	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5313-010-057	HO Overlay	0.15	2	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5313-010-058	HO Overlay	0.14	1	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5313-010-059	HO Overlay	0.14	5	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5313-010-060	HO Overlay	0.18	1	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5313-010-061	HO Overlay	0.14	3	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5313-010-062	HO Overlay	0.25	2	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5313-010-063	HO Overlay	0.37	7	70	10	4	5	19	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5313-010-064	HO Overlay	0.33	10	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5313-010-065	HO Overlay	0.65	10	70	18	8	9	35	7.5%	**7.5%**	**1.3**	**0.7**	**0.7**	**2.6**
5313-010-068	HO Overlay	0.25	1	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5313-011-001	HO Overlay	0.38	13	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5313-011-004	HO Overlay	0.47	20	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5313-011-005	HO Overlay	0.01	0	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5313-011-006	MU Overlay	0.08	1	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5313-011-008	MU Overlay	0.10	1	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5313-011-011	MU Overlay	0.13	0	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5313-011-014	MU Overlay	0.60	0	70	21	10	11	42	7.5%	**7.5%**	**1.6**	**0.8**	**0.8**	**3.2**
5313-011-016	HO Overlay	0.46	1	70	16	7	8	31	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.3**
5313-012-007	MU Overlay	0.12	2	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5313-012-008	MU Overlay	0.23	3	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5313-012-009	MU Overlay	0.28	0	70	10	5	5	20	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.5**
5313-017-009	HO Overlay	0.08	3	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5313-017-010	HO Overlay	0.60	21	70	11	5	5	21	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
5313-017-011	HO Overlay	0.34	7	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5313-017-013	HO Overlay	0.16	3	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5313-017-014	HO Overlay	0.15	4	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5313-017-017	HO Overlay	0.19	8	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5313-017-019	HO Overlay	0.13	4	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5313-017-020	HO Overlay	0.16	5	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5313-017-021	HO Overlay	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5313-017-022	HO Overlay	0.43	28	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5313-017-023	HO Overlay	0.43	9	70	11	5	5	21	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
5313-017-024	HO Overlay	0.47	17	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5313-017-025	HO Overlay	0.45	16	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5313-017-026	HO Overlay	0.15	4	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5313-017-027	HO Overlay	0.11	4	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5313-017-028	HO Overlay	0.39	10	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5313-017-031	HO Overlay	0.26	2	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5313-017-038	HO Overlay	0.82	5	70	27	13	13	53	7.5%	**7.5%**	**2.0**	**1.0**	**1.0**	**4.0**
5313-017-063	HO Overlay	0.30	3	70	9	4	5	18	7.5%	**7.5%**	**0.7**	**0.3**	**0.3**	**1.4**
5313-017-067	HO Overlay	0.17	3	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5313-017-802	HO Overlay	0.19	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5315-001-031	MU Overlay	0.08	1	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5315-001-032	MU Overlay	0.08	1	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5315-001-033	MU Overlay	0.05	1	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-001-034	MU Overlay	0.09	1	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-001-035	MU Overlay	0.19	4	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-001-036	MU Overlay	0.19	3	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-001-037	MU Overlay	0.23	8	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-001-038	MU Overlay	0.23	3	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5315-001-039	MU Overlay	0.08	1	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-001-040	MU Overlay	0.07	1	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5315-001-041	MU Overlay	0.05	1	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5315-001-042	MU Overlay	0.16	2	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-001-043	MU Overlay	0.17	7	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-001-044	MU Overlay	0.15	1	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-001-045	MU Overlay	0.25	8	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-001-047	MU Overlay	0.24	10	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-001-048	MU Overlay	0.24	6	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-001-073	MU Overlay	0.24	1	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5315-002-011	MU Overlay	0.05	1	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-002-012	MU Overlay	0.16	1	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-002-013	MU Overlay	0.24	9	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-002-014	MU Overlay	0.24	6	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-002-015	MU Overlay	0.23	1	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5315-002-016	MU Overlay	0.16	1	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-002-017	MU Overlay	0.06	1	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-002-018	MU Overlay	0.07	1	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5315-002-019	MU Overlay	0.16	2	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-002-020	MU Overlay	0.24	1	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5315-002-021	MU Overlay	0.23	4	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-002-022	MU Overlay	0.22	1	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5315-002-023	MU Overlay	0.15	3	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-002-024	MU Overlay	0.08	2	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5315-002-030	DTSP MUC	0.42	0	70	15	7	7	29	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.2**
5315-002-034	DTSP FOC	0.24	2	**70**	**8**	**3**	**4**	**15**	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5315-002-035	DTSP FOC	0.29	3	**70**	**9**	**4**	**5**	**18**	7.5%	**7.5%**	**0.7**	**0.3**	**0.3**	**1.4**
5315-002-036	DTSP FOC	0.32	3	**70**	**10**	**4**	**5**	**19**	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5315-002-037	DTSP FOC	0.03	0	**90**	**2**	**0**	**1**	**3**	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-002-038	DTSP FOC	0.13	1	**90**	**6**	**2**	**3**	**11**	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-002-039	DTSP FOC	0.18	2	**70**	**6**	**2**	**3**	**11**	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5315-002-040	DTSP FOC	0.32	0	90	14	7	7	28	7.5%	7.5%	1.1	0.5	0.5	2.1
5315-002-041	DTSP FOC	0.12	0	90	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5315-002-049	DTSP FOC	0.22	0	90	10	5	5	20	7.5%	7.5%	0.8	0.4	0.4	1.5
5315-002-055	DTSP FOC	1.00	0	90	45	22	23	90	7.5%	7.5%	3.4	1.7	1.7	6.8
5315-002-063	DTSP FOC	0.09	1	90	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5315-002-064	DTSP FOC	0.15	2	90	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5315-002-065	DTSP FOC	0.11	1	90	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5315-002-901	DTSP FOC	0.47	0	90	21	10	11	42	7.5%	7.5%	1.6	0.8	0.8	3.2
5315-003-023	DTSP MUC	0.07	1	70	2	1	1	4	7.5%	7.5%	0.2	0.1	0.1	0.3
5315-003-025	DTSP MUC	0.17	0	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5315-003-026	DTSP MUC	0.15	0	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5315-003-030	DTSP MUC	0.16	3	70	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5315-003-032	DTSP FOC	0.22	1	90	10	4	5	19	7.5%	7.5%	0.7	0.4	0.4	1.4
5315-003-033	DTSP FOC	0.18	2	90	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5315-003-034	DTSP FOC	0.18	0	90	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5315-003-039	DTSP FOC	0.20	0	90	9	4	5	18	7.5%	7.5%	0.7	0.3	0.3	1.4
5315-003-040	DTSP FOC	0.22	0	90	10	5	5	20	7.5%	7.5%	0.8	0.4	0.4	1.5
5315-003-041	DTSP FOC	0.20	0	90	9	4	5	18	7.5%	7.5%	0.7	0.3	0.3	1.4
5315-003-042	DTSP FOC	0.20	0	90	9	4	5	18	7.5%	7.5%	0.7	0.3	0.3	1.4
5315-003-047	DTSP FOC	0.09	0	70	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5315-003-048	DTSP FOC	0.13	0	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5315-003-049	DTSP FOC	0.08	0	70	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5315-003-050	DTSP FOC	0.17	0	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5315-003-054	DTSP FOC	0.07	0	90	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5315-003-055	DTSP FOC	0.07	0	90	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5315-003-056	DTSP FOC	0.09	0	90	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5315-003-057	DTSP FOC	0.37	0	90	17	8	9	34	7.5%	7.5%	1.3	0.6	0.6	2.6
5315-003-058	DTSP FOC	0.49	0	70	18	8	9	35	7.5%	7.5%	1.3	0.7	0.7	2.6

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5315-003-059	DTSP MUC	0.50	0	70	18	8	9	35	7.5%	**7.5%**	**1.3**	**0.7**	**0.7**	**2.6**
5315-003-061	DTSP MUC	0.42	7	70	11	5	6	22	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.7**
5315-003-085	DTSP MUC	0.08	0	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5315-003-803	DTSP MUC	0.42	0	70	15	7	8	30	7.5%	**7.5%**	**1.1**	**0.6**	**0.6**	**2.3**
5315-004-027	MU Overlay	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-004-028	MU Overlay	0.18	0	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5315-004-029	MU Overlay	0.18	12	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5315-004-030	MU Overlay	0.18	2	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-004-031	MU Overlay	0.18	4	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-004-032	MU Overlay	0.18	2	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-004-033	MU Overlay	0.18	1	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-004-034	MU Overlay	0.18	5	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-004-035	MU Overlay	0.18	0	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5315-004-036	MU Overlay	0.18	1	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-004-037	MU Overlay	0.18	12	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5315-005-060	MU Overlay	0.16	1	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-005-061	MU Overlay	0.16	1	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-005-062	MU Overlay	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-005-063	MU Overlay	0.16	2	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-005-064	MU Overlay	0.16	1	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-005-065	MU Overlay	0.16	5	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5315-005-066	MU Overlay	0.16	2	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-005-067	MU Overlay	0.13	1	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-005-070	MU Overlay	0.32	0	70	12	5	6	23	7.5%	**7.5%**	**0.9**	**0.4**	**0.4**	**1.7**
5315-007-019	MU Overlay	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-007-020	MU Overlay	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-007-021	MU Overlay	0.21	3	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-007-030	DTSP MUC	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5315-007-055	DTSP MUC	0.91	1	70	32	15	16	63	7.5%	**7.5%**	**2.4**	**1.2**	**1.2**	**4.7**
5315-008-032	DTSP MUC	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-008-033	DTSP MUC	0.24	0	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5315-008-035	DTSP MUC	0.24	0	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5315-008-036	DTSP MUC	0.33	0	70	12	5	6	23	7.5%	**7.5%**	**0.9**	**0.4**	**0.4**	**1.7**
5315-008-037	DTSP MUC	0.25	0	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5315-008-038	DTSP MUC	0.11	15	70	0	0	0	0	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.0**
5315-008-039	DTSP MUC	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-008-040	DTSP MUC	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-008-041	DTSP MUC	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-008-042	DTSP MUC	0.45	0	70	16	7	8	31	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.3**
5315-008-902	DTSP MUC	0.67	0	70	24	11	12	47	7.5%	**7.5%**	**1.8**	**0.9**	**0.9**	**3.5**
5315-008-903	DTSP MUC	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-009-022	DTSP MUC	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-009-023	DTSP MUC	0.05	0	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-009-024	DTSP MUC	0.03	0	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5315-009-025	DTSP MUC	0.08	0	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-009-026	DTSP MUC	0.08	1	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-009-027	DTSP MUC	0.03	1	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5315-009-028	DTSP MUC	0.05	0	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-009-029	DTSP MUC	0.11	1	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-009-030	DTSP MUC	0.10	1	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5315-009-031	DTSP MUC	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-009-032	DTSP MUC	0.17	1	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-009-033	DTSP MUC	0.17	4	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-009-034	DTSP MUC	0.17	3	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5315-009-035	DTSP MUC	0.31	0	70	11	5	6	22	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.7**
5315-009-036	DTSP MUC	0.17	2	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5315-009-037	DTSP MUC	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-009-038	DTSP MUC	0.18	0	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5315-009-039	DTSP MUC	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-009-046	DTSP MUC	0.09	1	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5315-009-047	DTSP MUC	0.09	1	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-009-050	DTSP MUC	0.33	0	70	12	5	6	23	7.5%	**7.5%**	**0.9**	**0.4**	**0.4**	**1.7**
5315-010-026	MU Overlay	0.19	2	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-010-027	MU Overlay	0.22	1	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5315-010-028	MU Overlay	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-010-029	MU Overlay	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-010-030	MU Overlay	0.17	5	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-010-031	MU Overlay	0.21	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5315-011-045	MU Overlay	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5315-011-046	MU Overlay	0.17	1	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-011-047	MU Overlay	0.17	1	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-011-048	MU Overlay	0.11	1	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-011-049	MU Overlay	0.08	1	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-011-050	MU Overlay	0.04	1	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5315-014-021	DTSP MUC	0.11	1	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5315-014-022	DTSP MUC	0.13	2	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-014-023	DTSP MUC	0.14	2	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-014-024	DTSP MUC	0.12	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-014-025	DTSP MUC	0.04	0	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-014-035	DTSP MUC	0.20	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5315-014-039	DTSP MUC	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-014-040	DTSP MUC	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-014-041	DTSP MUC	0.11	5	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-014-042	DTSP MUC	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5315-014-051	DTSP MUC	0.32	0	70	11	5	6	22	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.7**
5315-017-001	DTSP MUC	0.12	2	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5315-017-002	DTSP MUC	0.11	2	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5315-017-003	DTSP MUC	0.10	2	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-017-004	DTSP MUC	0.10	2	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-017-007	DTSP MUC	0.28	15	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5315-017-025	DTSP MUC	0.21	7	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-017-026	DTSP MUC	0.99	1	70	34	17	17	68	7.5%	**7.5%**	**2.6**	**1.3**	**1.3**	**5.1**
5315-017-027	DTSP MUC	0.46	0	70	16	8	8	32	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.4**
5315-017-028	DTSP MUC	0.63	18	70	13	6	7	26	7.5%	**7.5%**	**1.0**	**0.5**	**0.5**	**2.0**
5315-017-029	DTSP MUC	0.32	4	70	9	4	5	18	7.5%	**7.5%**	**0.7**	**0.3**	**0.3**	**1.4**
5315-017-031	DTSP MUC	0.56	23	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5315-017-033	DTSP MUC	0.04	2	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5315-017-034	DTSP MUC	0.10	2	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-017-035	DTSP MUC	0.09	2	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5315-017-036	DTSP MUC	0.25	4	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5315-017-037	DTSP MUC	0.25	19	70	0	0	0	0	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.0**
5315-017-039	DTSP MUC	0.24	14	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-017-040	DTSP MUC	0.14	0	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-017-043	DTSP MUC	0.20	3	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5315-017-044	DTSP MUC	0.47	20	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5315-017-045	DTSP MUC	0.44	0	70	16	7	8	31	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.3**
5315-017-047	DTSP MUC	0.24	4	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5315-017-059	DTSP MUC	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-017-059	DTSP MUC	0.09	0	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5315-017-059	DTSP MUC	0.04	0	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-017-059	DTSP MUC	0.04	0	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-017-069	DTSP MUC	0.18	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5315-017-069	DTSP MUC	0.11	0	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5315-017-084	DTSP MUC	0.26	0	70	9	4	5	18	7.5%	**7.5%**	**0.7**	**0.3**	**0.3**	**1.4**
5315-017-097	DTSP MUC	0.05	0	70	2	0	1	3	7.5%	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5315-017-101	DTSP MUC	0.03	2	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5315-017-101	DTSP MUC	0.01	0	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5315-019-047	DTSP MUC	0.25	3	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5315-020-004	DTSP MUC	0.30	0	70	11	5	5	21	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
5315-020-008	DTSP MUC	0.40	0	70	14	7	7	28	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.1**
5315-020-009	DTSP MUC	0.27	0	70	10	4	5	19	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5315-020-010	DTSP MUC	0.27	0	70	10	4	5	19	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5315-020-013	DTSP MUC	0.28	0	70	10	4	5	19	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5315-020-017	DTSP MUC	0.40	0	70	14	7	7	28	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.1**
5315-021-005	DTSP MUC	1.11	0	70	39	19	19	77	7.5%	**7.5%**	**2.9**	**1.4**	**1.4**	**5.8**
5315-021-008	DTSP MUC	0.57	1	70	20	9	10	39	7.5%	**7.5%**	**1.5**	**0.7**	**0.7**	**2.9**
5315-021-051	DTSP MUC	0.65	0	70	23	11	12	46	7.5%	**7.5%**	**1.7**	**0.9**	**0.9**	**3.5**
5317-018-005	MU Overlay	0.65	0	70	23	11	11	45	7.5%	**7.5%**	**1.7**	**0.8**	**0.8**	**3.4**
5317-018-006	MU Overlay	0.53	0	70	19	9	9	37	7.5%	**7.5%**	**1.4**	**0.7**	**0.7**	**2.8**
5317-020-031	MU Overlay	4.44	0	70	156	77	78	311	7.5%	**7.5%**	**11.7**	**5.8**	**5.8**	**23.3**
5317-020-032	MU Overlay	0.35	0	70	12	6	6	24	7.5%	**7.5%**	**0.9**	**0.5**	**0.5**	**1.8**
5318-004-020	DTSP FOC	0.21	0	**90**	**10**	**4**	**5**	**19**	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5318-004-021	DTSP FOC	0.31	0	**90**	**14**	**7**	**7**	**28**	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.1**
5318-004-022	DTSP FOC	0.35	0	**90**	**16**	**7**	**8**	**31**	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.3**
5318-004-024	DTSP FOC	2.00	0	**90**	**90**	**45**	**45**	**180**	7.5%	**7.5%**	**6.8**	**3.4**	**3.4**	**13.5**
5318-014-001	DTSP FOC	0.18	0	**90**	**8**	**4**	**4**	**16**	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5318-014-002	DTSP FOC	0.09	0	**90**	**4**	**2**	**2**	**8**	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5318-014-003	DTSP FOC	0.19	0	**90**	**9**	**4**	**4**	**17**	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5318-014-008	DTSP FOC	0.18	0	**90**	**8**	**4**	**4**	**16**	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5318-014-018	DTSP MUC	0.15	4	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5318-014-020	DTSP MUC	0.25	0	70	9	4	5	18	7.5%	7.5%	0.7	0.3	0.3	1.4
5318-014-095	DTSP FOC	0.18	0	90	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5318-014-096	DTSP FOC	0.18	0	90	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5318-014-097	DTSP MUC	0.16	1	70	5	2	3	10	7.5%	7.5%	0.4	0.2	0.2	0.8
5318-015-001	DTSP FOC	0.19	0	90	9	4	4	17	7.5%	7.5%	0.6	0.3	0.3	1.3
5318-015-002	DTSP FOC	0.18	0	90	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5318-015-003	DTSP FOC	0.09	0	90	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5318-015-004	DTSP FOC	0.27	0	90	12	6	6	24	7.5%	7.5%	0.9	0.5	0.5	1.8
5318-015-005	DTSP FOC	0.18	0	90	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5318-015-006	DTSP FOC	0.21	0	90	10	4	5	19	7.5%	7.5%	0.7	0.4	0.4	1.4
5318-015-007	DTSP MUC	0.19	0	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5318-015-008	DTSP MUC	0.19	0	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5318-015-009	DTSP MUC	0.18	0	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5318-015-036	DTSP FOC	0.85	0	90	39	19	19	77	7.5%	7.5%	2.9	1.4	1.4	5.8
5318-016-019	DTSP FOC	0.26	0	90	12	6	6	24	7.5%	7.5%	0.9	0.5	0.5	1.8
5318-016-021	DTSP FOC	0.01	0	90	1	0	0	1	7.5%	7.5%	0.0	0.0	0.0	0.1
5318-016-022	DTSP FOC	0.01	0	90	1	0	0	1	7.5%	7.5%	0.0	0.0	0.0	0.1
5318-016-023	DTSP FOC	0.43	0	90	20	9	10	39	7.5%	7.5%	1.5	0.7	0.7	2.9
5318-016-024	DTSP FOC	0.17	0	90	8	3	4	15	7.5%	7.5%	0.6	0.3	0.3	1.1
5318-016-025	DTSP FOC	0.17	0	90	8	3	4	15	7.5%	7.5%	0.6	0.3	0.3	1.1
5318-016-026	DTSP FOC	0.17	0	90	8	3	4	15	7.5%	7.5%	0.6	0.3	0.3	1.1
5318-016-027	DTSP FOC	0.35	0	90	16	8	8	32	7.5%	7.5%	1.2	0.6	0.6	2.4
5318-016-038	DTSP FOC	0.08	0	90	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5318-016-039	DTSP FOC	0.08	0	90	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5319-003-029	MU Overlay	0.89	0	70	31	15	16	62	7.5%	7.5%	2.3	1.2	1.2	4.7
5319-003-032	MU Overlay	0.89	0	70	31	15	16	62	7.5%	7.5%	2.3	1.2	1.2	4.7
5319-004-021	HO Overlay	0.12	1	70	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5319-004-022	HO Overlay	0.19	5	70	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5319-004-035	HO Overlay	0.12	2	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5319-004-036	HO Overlay	0.12	2	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5319-004-037	HO Overlay	0.12	2	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5319-005-021	HO Overlay	0.46	12	70	10	5	5	20	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.5**
5319-005-022	HO Overlay	0.32	16	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5319-005-023	HO Overlay	0.38	0	70	14	6	7	27	7.5%	**7.5%**	**1.0**	**0.5**	**0.5**	**2.0**
5319-005-024	HO Overlay	0.26	0	70	9	4	5	18	7.5%	**7.5%**	**0.7**	**0.3**	**0.3**	**1.4**
5319-005-025	HO Overlay	0.12	1	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5319-006-005	HO Overlay	0.35	4	70	11	5	5	21	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
5319-006-025	HO Overlay	0.46	16	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5319-006-027	HO Overlay	0.38	12	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5319-006-034	HO Overlay	0.44	14	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5319-007-001	HO Overlay	0.40	21	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5319-007-043	HO Overlay	0.46	12	70	10	5	5	20	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.5**
5319-007-048	HO Overlay	0.75	1	70	26	12	13	51	7.5%	**7.5%**	**1.9**	**1.0**	**1.0**	**3.8**
5319-008-001	MU Overlay	0.24	0	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5319-008-002	MU Overlay	0.16	0	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-008-005	MU Overlay	0.14	0	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-008-006	MU Overlay	0.14	0	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-008-007	MU Overlay	0.14	0	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-008-008	MU Overlay	0.29	0	70	10	5	5	20	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.5**
5319-008-009	HO Overlay	0.20	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5319-008-018	HO Overlay	0.50	1	70	17	8	9	34	7.5%	**7.5%**	**1.3**	**0.6**	**0.6**	**2.6**
5319-008-039	MU Overlay	0.30	0	70	11	5	5	21	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
5319-009-003	MU Overlay	0.07	0	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5319-009-004	MU Overlay	0.20	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5319-009-005	MU Overlay	0.20	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5319-009-013	MU Overlay	0.46	12	70	10	5	5	20	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.5**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5319-009-014	MU Overlay	0.42	14	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5319-009-015	MU Overlay	0.21	4	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5319-009-016	MU Overlay	0.21	4	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5319-009-033	MU Overlay	0.28	0	70	10	5	5	20	7.5%	7.5%	0.8	0.4	0.4	1.5
5319-009-036	MU Overlay	0.69	0	70	24	12	12	48	7.5%	7.5%	1.8	0.9	0.9	3.6
5319-009-037	MU Overlay	1.23	0	70	43	21	22	86	7.5%	7.5%	3.2	1.6	1.6	6.5
5319-018-001	HO Overlay	0.33	4	70	10	4	5	19	7.5%	7.5%	0.7	0.4	0.4	1.4
5319-018-002	HO Overlay	0.27	8	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5319-018-004	HO Overlay	0.27	5	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5319-018-005	HO Overlay	0.27	2	70	9	4	4	17	7.5%	7.5%	0.6	0.3	0.3	1.3
5319-018-006	HO Overlay	0.27	2	70	9	4	4	17	7.5%	7.5%	0.6	0.3	0.3	1.3
5319-018-011	HO Overlay	0.28	8	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5319-018-012	HO Overlay	0.28	7	70	7	3	3	13	7.5%	7.5%	0.5	0.2	0.2	1.0
5319-018-013	HO Overlay	0.28	8	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5319-018-015	HO Overlay	0.28	4	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5319-018-016	HO Overlay	0.14	1	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5319-018-017	HO Overlay	0.22	1	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5319-018-018	HO Overlay	0.22	1	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5319-018-019	HO Overlay	0.28	3	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5319-018-020	HO Overlay	0.56	0	70	20	9	10	39	7.5%	7.5%	1.5	0.7	0.7	2.9
5319-018-022	HO Overlay	0.27	1	70	9	4	5	18	7.5%	7.5%	0.7	0.3	0.3	1.4
5319-018-029	HO Overlay	0.28	8	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5319-019-001	MU Overlay	0.17	0	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5319-019-002	MU Overlay	0.08	0	70	3	1	1	5	7.5%	7.5%	0.2	0.1	0.1	0.4
5319-019-005	MU Overlay	0.07	0	70	3	1	1	5	7.5%	7.5%	0.2	0.1	0.1	0.4
5319-019-007	HO Overlay	0.23	11	70	3	1	1	5	7.5%	7.5%	0.2	0.1	0.1	0.4
5319-019-008	HO Overlay	0.23	3	70	7	3	3	13	7.5%	7.5%	0.5	0.2	0.2	1.0
5319-019-009	HO Overlay	0.23	3	70	7	3	3	13	7.5%	7.5%	0.5	0.2	0.2	1.0

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5319-019-013	HO Overlay	0.23	1	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5319-019-014	HO Overlay	0.23	3	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5319-019-015	HO Overlay	0.23	4	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5319-019-016	HO Overlay	0.23	4	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5319-019-019	HO Overlay	0.23	8	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5319-019-021	HO Overlay	0.23	8	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5319-019-024	MU Overlay	0.15	0	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-019-025	MU Overlay	0.21	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5319-019-027	HO Overlay	0.46	2	70	15	7	8	30	7.5%	**7.5%**	**1.1**	**0.6**	**0.6**	**2.3**
5319-019-045	HO Overlay	0.46	12	70	10	5	5	20	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.5**
5319-019-056	HO Overlay	0.23	8	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5319-019-061	HO Overlay	0.21	2	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5319-019-064	HO Overlay	0.23	2	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5319-020-011	MU Overlay	0.21	0	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5319-020-026	MU Overlay	0.37	0	70	13	6	7	26	7.5%	**7.5%**	**1.0**	**0.5**	**0.5**	**2.0**
5319-035-001	MU Overlay	0.58	0	70	21	10	10	41	7.5%	**7.5%**	**1.5**	**0.8**	**0.8**	**3.1**
5319-035-002	HO Overlay	0.28	5	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5319-035-003	HO Overlay	0.35	8	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5319-035-006	MU Overlay	0.19	1	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5319-035-012	HO Overlay	0.26	7	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-035-013	HO Overlay	0.19	1	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5319-035-014	HO Overlay	0.22	2	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5319-035-015	HO Overlay	0.03	1	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**
5319-035-016	MU Overlay	0.17	4	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5319-036-016	HO Overlay	0.18	4	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5319-036-017	HO Overlay	0.17	3	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5319-036-018	HO Overlay	0.19	4	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5319-036-019	HO Overlay	0.17	1	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5319-036-021	HO Overlay	0.17	4	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5319-037-001	HO Overlay	0.58	20	70	11	5	5	21	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
5319-037-002	HO Overlay	0.22	4	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-037-003	HO Overlay	0.24	7	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-037-004	HO Overlay	0.21	8	70	3	1	2	6	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.5**
5319-037-005	HO Overlay	0.20	7	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5319-037-006	HO Overlay	0.21	4	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-037-007	HO Overlay	0.21	3	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-038-001	HO Overlay	0.25	6	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5319-038-008	HO Overlay	0.18	4	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5319-038-018	HO Overlay	0.44	0	70	16	7	8	31	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.3**
5319-038-020	HO Overlay	0.74	24	70	14	7	7	28	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.1**
5319-038-022	HO Overlay	0.24	1	70	8	4	4	16	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5319-038-028	HO Overlay	0.22	1	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5320-001-004	DTSP FOC	0.12	0	**90**	**6**	**2**	**3**	**11**	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5320-001-021	DTSP FOC	0.36	0	**90**	**16**	**8**	**8**	**32**	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.4**
5320-001-024	DTSP FOC	0.68	0	**90**	**31**	**15**	**15**	**61**	7.5%	**7.5%**	**2.3**	**1.1**	**1.1**	**4.6**
5320-003-001	MU Overlay	0.39	0	70	14	7	7	28	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.1**
5320-003-003	MU Overlay	0.20	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5320-003-005	MU Overlay	0.21	0	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5320-003-006	MU Overlay	0.22	0	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5320-003-007	MU Overlay	0.25	0	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5320-003-008	MU Overlay	0.22	1	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5320-005-903	MU Overlay	0.22	0	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5320-005-904	MU Overlay	0.22	0	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5320-005-905	MU Overlay	0.22	0	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5320-007-019	HO Overlay	0.13	1	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5320-007-020	HO Overlay	0.28	4	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5320-007-021	HO Overlay	0.41	12	70	9	4	4	17	7.5%	7.5%	0.6	0.3	0.3	1.3
5320-007-022	HO Overlay	0.81	19	70	19	9	10	38	7.5%	7.5%	1.4	0.7	0.7	2.9
5320-008-024	HO Overlay	0.80	27	70	15	7	7	29	7.5%	7.5%	1.1	0.5	0.5	2.2
5320-008-025	HO Overlay	0.40	7	70	11	5	5	21	7.5%	7.5%	0.8	0.4	0.4	1.6
5320-009-005	HO Overlay	0.54	22	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5320-009-006	HO Overlay	0.20	8	70	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5320-009-008	HO Overlay	0.40	13	70	8	3	4	15	7.5%	7.5%	0.6	0.3	0.3	1.1
5320-009-010	HO Overlay	0.40	12	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5320-009-015	HO Overlay	0.40	6	70	11	5	6	22	7.5%	7.5%	0.8	0.4	0.4	1.7
5320-009-017	HO Overlay	0.40	24	70	2	1	1	4	7.5%	7.5%	0.2	0.1	0.1	0.3
5320-009-022	HO Overlay	0.29	6	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5320-009-024	HO Overlay	0.17	0	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5320-009-025	MU Overlay	0.33	0	70	12	5	6	23	7.5%	7.5%	0.9	0.4	0.4	1.7
5320-009-028	HO Overlay	0.40	10	70	9	4	5	18	7.5%	7.5%	0.7	0.3	0.3	1.4
5320-009-031	MU Overlay	0.81	0	70	28	14	14	56	7.5%	7.5%	2.1	1.1	1.1	4.2
5320-010-001	HO Overlay	0.38	0	70	14	6	7	27	7.5%	7.5%	1.0	0.5	0.5	2.0
5320-010-002	HO Overlay	0.25	0	70	9	4	4	17	7.5%	7.5%	0.6	0.3	0.3	1.3
5320-010-003	HO Overlay	0.23	4	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5320-010-005	HO Overlay	0.28	8	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5320-011-001	HO Overlay	0.29	4	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5320-011-002	HO Overlay	0.13	1	70	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5320-011-003	HO Overlay	0.41	1	70	14	7	7	28	7.5%	7.5%	1.1	0.5	0.5	2.1
5320-011-004	HO Overlay	0.23	4	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5320-031-011	MU Overlay	0.32	0	70	12	5	6	23	7.5%	7.5%	0.9	0.4	0.4	1.7
5320-031-022	MU Overlay	0.30	0	70	11	5	5	21	7.5%	7.5%	0.8	0.4	0.4	1.6
5320-032-003	MU Overlay	0.33	0	70	12	5	6	23	7.5%	7.5%	0.9	0.4	0.4	1.7
5321-007-014	MU Overlay	0.32	0	70	12	5	6	23	7.5%	7.5%	0.9	0.4	0.4	1.7
5321-015-004	MU Overlay	0.13	5	70	2	1	1	4	7.5%	7.5%	0.2	0.1	0.1	0.3

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5321-015-020	MU Overlay	0.33	0	70	12	5	6	23	7.5%	**7.5%**	**0.9**	**0.4**	**0.4**	**1.7**
5321-015-021	MU Overlay	0.20	0	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5321-017-002	MU Overlay	0.32	8	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5321-017-012	MU Overlay	0.14	0	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5321-017-900	MU Overlay	0.03	0	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-019-003	MU Overlay	0.18	1	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5321-019-004	MU Overlay	0.38	0	70	14	6	7	27	7.5%	**7.5%**	**1.0**	**0.5**	**0.5**	**2.0**
5321-019-009	MU Overlay	0.17	0	70	6	3	3	12	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**0.9**
5321-019-022	MU Overlay	2.92	0	70	102	51	51	204	7.5%	**7.5%**	**7.7**	**3.8**	**3.8**	**15.3**
5321-019-023	MU Overlay	0.35	0	70	12	6	6	24	7.5%	**7.5%**	**0.9**	**0.5**	**0.5**	**1.8**
5321-038-016	MU Overlay	0.31	0	70	11	5	6	22	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.7**
5321-038-017	MU Overlay	0.33	0	70	12	5	6	23	7.5%	**7.5%**	**0.9**	**0.4**	**0.4**	**1.7**
5311-015-027	HO Overlay	0.46	1	70	16	7	8	31	7.5%	**7.5%**	**1.2**	**0.6**	**0.6**	**2.3**
5319-006-028	HO Overlay	0.44	1	70	15	7	7	29	7.5%	**7.5%**	**1.1**	**0.5**	**0.5**	**2.2**
5319-007-036	HO Overlay	0.46	8	70	12	6	6	24	7.5%	**7.5%**	**0.9**	**0.5**	**0.5**	**1.8**
5319-018-027	HO Overlay	0.28	1	70	10	4	5	19	7.5%	**7.5%**	**0.7**	**0.4**	**0.4**	**1.4**
5319-019-040	HO Overlay	0.461898	2	70	15	7	8	30	7.5%	**7.5%**	**1.1**	**0.6**	**0.6**	**2.3**
5319-019-053	HO Overlay	0.231241	2	70	7	3	4	14	7.5%	**7.5%**	**0.5**	**0.3**	**0.3**	**1.1**
5319-020-012	HO Overlay	0.389627	12	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5319-020-013	HO Overlay	0.391943	6	70	11	5	5	21	7.5%	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
~~5320-009-004~~	~~HO Overlay~~	~~0.17~~	~~2~~	~~70~~	~~5~~	~~2~~	~~3~~	~~10~~	~~7.5%~~	~~7.5%~~	~~0.4~~	~~0.2~~	~~0.2~~	~~0.8~~
5319-036-020	HO Overlay	0.17	1	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5320-017-015	HO Overlay	0.147024	1	70	5	2	2	9	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.7**
5320-018-001	HO Overlay	0.231782	8	70	4	2	2	8	7.5%	**7.5%**	**0.3**	**0.2**	**0.2**	**0.6**
5320-018-003	HO Overlay	0.292892	11	70	5	2	3	10	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5320-018-004	HO Overlay	0.356509	8	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5320-018-006	HO Overlay	0.157781	6	70	3	1	1	5	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.4**
5320-018-007	HO Overlay	0.020943	0	70	1	0	0	1	7.5%	**7.5%**	**0.0**	**0.0**	**0.0**	**0.1**

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5320-018-014	HO Overlay	0.013909	0	70	1	0	0	1	7.5%	7.5%	0.0	0.0	0.0	0.1
5320-018-024	HO Overlay	0.050574	0	70	2	1	1	4	7.5%	7.5%	0.2	0.1	0.1	0.3
5320-018-026	HO Overlay	0.238084	1	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5320-020-001	HO Overlay	0.431592	8	70	11	5	6	22	7.5%	7.5%	0.8	0.4	0.4	1.7
5320-020-003	HO Overlay	0.172198	7	70	3	1	1	5	7.5%	7.5%	0.2	0.1	0.1	0.4
5320-020-004	HO Overlay	0.172846	4	70	4	2	2	8	7.5%	7.5%	0.3	0.2	0.2	0.6
5320-020-006	HO Overlay	0.299698	5	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5320-021-003	HO Overlay	0.195324	1	70	7	3	3	13	7.5%	7.5%	0.5	0.2	0.2	1.0
5320-021-004	HO Overlay	0.206998	5	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5320-021-007	HO Overlay	0.40194	12	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5320-021-009	HO Overlay	0.401962	0	70	14	7	7	28	7.5%	7.5%	1.1	0.5	0.5	2.1
5320-021-014	HO Overlay	0.279484	11	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5320-021-020	HO Overlay	0.144725	4	70	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5320-021-021	HO Overlay	0.21695	14	70	1	0	0	1	7.5%	7.5%	0.0	0.0	0.0	0.1
5320-021-023	HO Overlay	0.383983	14	70	7	3	3	13	7.5%	7.5%	0.5	0.2	0.2	1.0
5320-021-024	HO Overlay	0.20105	12	70	1	0	1	2	7.5%	7.5%	0.1	0.0	0.0	0.2
5320-021-025	HO Overlay	0.201041	12	70	1	0	1	2	7.5%	7.5%	0.1	0.0	0.0	0.2
5320-031-012	HO Overlay	0.325738	2	70	11	5	5	21	7.5%	7.5%	0.8	0.4	0.4	1.6
5320-031-013	HO Overlay	0.325766	4	70	10	4	5	19	7.5%	7.5%	0.7	0.4	0.4	1.4
5320-031-014	HO Overlay	0.32576	0	70	12	5	6	23	7.5%	7.5%	0.9	0.4	0.4	1.7
5320-031-015	HO Overlay	0.325578	10	70	7	3	3	13	7.5%	7.5%	0.5	0.2	0.2	1.0
5321-007-018	HO Overlay	0.839055	4	70	28	13	14	55	7.5%	7.5%	2.1	1.0	1.0	4.1
5321-008-017	HO Overlay	0.259708	6	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5321-008-049	HO Overlay	0.519766	1	70	18	8	9	35	7.5%	7.5%	1.3	0.7	0.7	2.6
5321-008-065	HO Overlay	0.242365	1	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5321-011-006	HO Overlay	0.344049	6	70	9	4	5	18	7.5%	7.5%	0.7	0.3	0.3	1.4
5321-011-007	HO Overlay	0.217241	5	70	5	2	3	10	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-011-008	HO Overlay	0.4933	12	70	12	5	6	23	7.5%	7.5%	0.9	0.4	0.4	1.7

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5321-012-008	HO Overlay	0.334113	0	70	12	5	6	23	7.5%	7.5%	0.9	0.4	0.4	1.7
5321-012-017	HO Overlay	0.156178	0	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-012-018	HO Overlay	0.27198	8	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-014-001	HO Overlay	0.007946	0	70	1	0	0	1	7.5%	7.5%	0.0	0.0	0.0	0.1
5321-014-002	HO Overlay	0.140956	3	70	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5321-014-003	HO Overlay	0.143764	3	70	4	1	2	7	7.5%	7.5%	0.3	0.1	0.1	0.5
5321-014-012	HO Overlay	0.091551	1	70	3	1	1	5	7.5%	7.5%	0.2	0.1	0.1	0.4
5321-014-017	HO Overlay	0.148014	1	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5321-014-018	HO Overlay	0.089484	0	70	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5321-015-005	HO Overlay	0.131992	0	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5321-015-006	HO Overlay	0.13203	3	70	3	1	2	6	7.5%	7.5%	0.2	0.1	0.1	0.5
5321-015-007	HO Overlay	0.229107	4	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5321-015-015	HO Overlay	0.204511	2	70	6	3	3	12	7.5%	7.5%	0.5	0.2	0.2	0.9
5321-015-016	HO Overlay	0.162441	1	70	5	2	3	10	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-015-017	HO Overlay	0.194132	1	70	7	3	3	13	7.5%	7.5%	0.5	0.2	0.2	1.0
5321-015-018	HO Overlay	0.198429	0	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5321-017-003	HO Overlay	0.264994	8	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-017-004	HO Overlay	0.212721	1	70	7	3	4	14	7.5%	7.5%	0.5	0.3	0.3	1.1
5321-017-006	HO Overlay	0.125775	0	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5321-017-008	HO Overlay	0.159863	0	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-017-009	HO Overlay	0.365176	10	70	8	4	4	16	7.5%	7.5%	0.6	0.3	0.3	1.2
5321-017-010	HO Overlay	0.174857	1	70	6	2	3	11	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-017-011	HO Overlay	0.14595	1	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7
5321-017-013	HO Overlay	0.223718	1	70	8	3	4	15	7.5%	7.5%	0.6	0.3	0.3	1.1
5321-018-001	HO Overlay	0.15826	1	70	5	2	3	10	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-018-002	HO Overlay	0.158435	1	70	5	2	3	10	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-018-003	HO Overlay	0.153658	1	70	5	2	3	10	7.5%	7.5%	0.4	0.2	0.2	0.8
5321-018-004	HO Overlay	0.157747	2	70	5	2	2	9	7.5%	7.5%	0.3	0.2	0.2	0.7

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	**Zone/Overlay**	**Parcel Size (Acres)**	**Existing Units**	**Maximum Density**	**Lower- Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**	**Base Probability**	**Total Adjustment**	**Lower-Income Units**	**Moderate-Income Units**	**Above Moderate-Income Units**	**Total Capacity**
5321-018-005	HO Overlay	0.170142	1	70	6	2	3	11	7.5%	**7.5%**	**0.4**	**0.2**	**0.2**	**0.8**
5321-018-006	HO Overlay	0.392659	10	70	9	4	4	17	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.3**
5321-018-011	HO Overlay	0.068447	1	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5321-018-012	HO Overlay	0.068819	1	70	2	1	1	4	7.5%	**7.5%**	**0.2**	**0.1**	**0.1**	**0.3**
5321-018-013	HO Overlay	0.041278	1	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-018-014	HO Overlay	0.041496	1	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-018-015	HO Overlay	0.041298	1	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-018-016	HO Overlay	0.041544	1	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-018-017	HO Overlay	0.041261	1	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-018-020	HO Overlay	0.114476	1	70	4	1	2	7	7.5%	**7.5%**	**0.3**	**0.1**	**0.1**	**0.5**
5321-018-025	HO Overlay	0.063217	2	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-018-026	HO Overlay	0.06369	2	70	1	0	1	2	7.5%	**7.5%**	**0.1**	**0.0**	**0.0**	**0.2**
5321-019-012	HO Overlay	0.234309	1	70	8	3	4	15	7.5%	**7.5%**	**0.6**	**0.3**	**0.3**	**1.1**
5321-019-013	HO Overlay	0.229421	3	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5321-019-021	HO Overlay	0.229429	3	70	7	3	3	13	7.5%	**7.5%**	**0.5**	**0.2**	**0.2**	**1.0**
5321-005-032	**CF - 50 du/ac**	**5.59**	**4**	**50**	**138**	**69**	**69**	**276**	**7.5%**	**7.5%**	**10.4**	**5.2**	**5.2**	**20.7**
5320-032-039	**CF - 50 du/ac**	**2.47**	**0**	**50**	**62**	**31**	**31**	**124**	**7.5%**	**7.5%**	**4.7**	**2.3**	**2.3**	**9.3**
5319-017-900	**CF - 50 du/ac**	**4.90**	**0**	**50**	**123**	**61**	**61**	**245**	**7.5%**	**7.5%**	**9.2**	**4.6**	**4.6**	**18.4**
5315-003-031	**DTSP MUC**	**1.15**	**0**	**70**	**41**	**20**	**20**	**81**	**7.5%**	**7.5%**	**3.0**	**1.5**	**1.5**	**6.1**
5311-001-028	**HO Overlay**	**0.62**	**18**	**70**	**13**	**6**	**6**	**25**	**7.5%**	**7.5%**	**0.9**	**0.5**	**0.5**	**1.9**
5311-001-008	**HO Overlay**	**0.24**	**1**	**70**	**8**	**4**	**4**	**16**	**7.5%**	**7.5%**	**0.6**	**0.3**	**0.3**	**1.2**
5311-002-057	**HO Overlay**	**0.32**	**1**	**70**	**11**	**5**	**5**	**21**	**7.5%**	**7.5%**	**0.8**	**0.4**	**0.4**	**1.6**
5311-002-900	**HO Overlay**	**0.04**	**0**	**70**	**2**	**0**	**1**	**3**	**7.5%**	**7.5%**	**0.1**	**0.1**	**0.1**	**0.2**
5311-002-056	**HO Overlay**	**0.37**	**1**	**70**	**13**	**6**	**6**	**25**	**7.5%**	**7.5%**	**0.9**	**0.5**	**0.5**	**1.9**
5311-002-123	**HO Overlay**	**0.66**	**14**	**70**	**16**	**8**	**8**	**32**	**7.5%**	**7.5%**	**1.2**	**0.6**	**0.6**	**2.4**
5318-015-017	**DTSP MUC**	**0.61**	**0**	**70**	**22**	**10**	**11**	**43**	**7.5%**	**7.5%**	**1.6**	**0.8**	**0.8**	**3.2**
~~5311001008~~	~~RM~~	~~0.25~~		~~70~~	~~8~~	~~4~~	~~4~~	~~16~~	~~5%~~	~~5%~~	~~0.400~~	~~0.200~~	~~0.200~~	~~0.800~~
~~5311001020~~	~~RM~~	~~0.56~~	~~1~~	~~70~~	~~19~~	~~10~~	~~10~~	~~39~~	~~5%~~	~~5%~~	~~0.975~~	~~0.488~~	~~0.488~~	~~1.950~~
~~5311002056~~	~~RM~~	~~0.35~~	~~2~~	~~70~~	~~11~~	~~6~~	~~6~~	~~23~~	~~5%~~	~~5%~~	~~0.575~~	~~0.288~~	~~0.288~~	~~1.150~~
~~5311002057~~	~~RM~~	~~0.35~~	~~1~~	~~70~~	~~12~~	~~6~~	~~6~~	~~24~~	~~5%~~	~~5%~~	~~0.600~~	~~0.300~~	~~0.300~~	~~1.200~~

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5311002122	RM	0.53	1	70	18	9	9	36	5%	5%	0.900	0.450	0.450	1.800
5311002900	RM	0.06	1	70	2	1	1	4	5%	5%	0.100	0.050	0.050	0.200
5311010006	RM	0.21	1	70	7	3	3	13	5%	5%	0.325	0.163	0.163	0.650
5311010007	RM	0.31	1	70	10	5	5	20	5%	5%	0.500	0.250	0.250	1.000
5311010008	RM	0.65	1	70	22	11	11	44	5%	5%	1.100	0.550	0.550	2.200
5311010009	RM	0.26	2	70	8	4	4	16	5%	5%	0.400	0.200	0.200	0.800
5311010010	RM	0.34	1	70	11	6	6	23	5%	5%	0.575	0.288	0.288	1.150
5311010011	RM	0.22	2	70	7	3	3	13	5%	5%	0.325	0.163	0.163	0.650
5311010012	RM	0.28	1	70	9	5	5	19	5%	5%	0.475	0.238	0.238	0.950
5311010015	RM	0.40	1	70	13	7	7	27	5%	5%	0.675	0.338	0.338	1.350
5311010016	RM	0.17	1	70	5	3	3	11	5%	5%	0.275	0.138	0.138	0.550
5311010052	RM	0.37	1	70	12	6	6	24	5%	5%	0.600	0.300	0.300	1.200
5311012004	RM	0.17	1	70	6	3	3	12	5%	3%	0.150	0.075	0.075	0.300
5311012018	RM	0.84	1	70	29	14	14	57	5%	5%	1.425	0.713	0.713	2.850
5311012020	RM	1.60	1	70	56	28	28	112	5%	5%	2.800	1.400	1.400	5.600
5311015028	RM	0.76	1	70	26	13	13	52	5%	5%	1.300	0.650	0.650	2.600
5311015029	RM	0.69	1	70	24	12	12	48	5%	5%	1.200	0.600	0.600	2.400
5311015030	RM	0.30	4	70	9	4	4	17	5%	5%	0.425	0.213	0.213	0.850
5311015048	RM	1.10	1	70	38	19	19	76	5%	5%	1.900	0.950	0.950	3.800
5313003039	RM	0.19	5	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313003040	RM	0.26	2	70	8	4	4	16	5%	5%	0.400	0.200	0.200	0.800
5313003041	RM	0.34	1	70	12	6	6	24	5%	5%	0.600	0.300	0.300	1.200
5313003042	RM	0.20	2	70	6	3	3	12	5%	5%	0.300	0.150	0.150	0.600
5313003045	RM	0.24	1	70	8	4	4	16	5%	5%	0.400	0.200	0.200	0.800
5313004018	RM	0.55	24	70	7	4	4	15	5%	8%	0.563	0.281	0.281	1.125
5313004030	RM	0.18	1	70	6	3	3	12	5%	8%	0.450	0.225	0.225	0.900
5313004031	RM	0.18	2	70	5	3	3	11	5%	8%	0.413	0.206	0.206	0.825
5313004032	RM	0.21	2	70	6	3	3	12	5%	8%	0.450	0.225	0.225	0.900
5313004033	RM	0.20	8	70	3	1	1	5	5%	8%	0.188	0.094	0.094	0.375
5313004034	RM	0.20	8	70	3	1	1	5	5%	8%	0.188	0.094	0.094	0.375
5313004035	RM	0.63	26	70	9	4	4	17	5%	8%	0.638	0.319	0.319	1.275
5313004036	RM	0.59	10	70	16	8	8	32	5%	5%	0.800	0.400	0.400	1.600
5313004037	RM	0.18	3	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313004038	RM	0.17	2	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313004039	RM	0.15	2	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313004040	RM	0.14	3	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313004041	RM	0.15	1	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313004042	RM	0.13	1	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313004043	RM	0.13	1	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313004044	RM	0.14	1	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313004045	RM	0.17	5	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313004046	RM	0.37	1	70	12	6	6	24	5%	5%	0.600	0.300	0.300	1.200
5313004047	RM	0.16	1	70	5	3	3	11	5%	5%	0.275	0.138	0.138	0.550
5313004048	RM	0.16	1	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313004049	RM	0.18	6	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313004050	RM	0.29	8	70	6	3	3	12	5%	5%	0.300	0.150	0.150	0.600
5313004051	RM	0.15	1	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313004052	RM	0.19	2	70	6	3	3	12	5%	8%	0.450	0.225	0.225	0.900
5313004053	RM	0.22	3	70	6	3	3	12	5%	8%	0.450	0.225	0.225	0.900

					Max. Add'l Dev. Capacity				Dev. Capacity Adjustments		Anticipated Dev. Capacity			
APN	Zone/Overlay	Parcel Size (Acres)	Existing Units	Maximum Density	Lower- Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity	Base Probability	Total Adjustment	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Capacity
5313009008	RM	0.14	4	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313009009	RM	0.31	4	70	9	5	5	19	5%	5%	0.475	0.238	0.238	0.950
5313009010	RM	0.05	1	70	1	1	1	3	5%	5%	0.075	0.038	0.038	0.150
5313009011	RM	0.18	2	70	5	3	3	11	5%	5%	0.275	0.138	0.138	0.550
5313009012	RM	0.22	1	70	7	4	4	15	5%	5%	0.375	0.188	0.188	0.750
5313009013	RM	0.13	2	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313009014	RM	0.19	4	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313009015	RM	0.47	8	70	12	6	6	24	5%	5%	0.600	0.300	0.300	1.200
5313009016	RM	0.02	1	70	0	0	0	0	5%	5%	0	0	0	0
5313009017	RM	0.17	3	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313009018	RM	0.52	20	70	8	4	4	16	5%	5%	0.400	0.200	0.200	0.800
5313009019	RM	0.18	3	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313009020	RM	0.18	1	70	6	3	3	12	5%	3%	0.150	0.075	0.075	0.300
5313009021	RM	0.20	4	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313009022	RM	0.35	9	70	8	4	4	16	5%	5%	0.400	0.200	0.200	0.800
5313009023	RM	0.17	3	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313009024	RM	0.17	1	70	5	3	3	11	5%	5%	0.275	0.138	0.138	0.550
5313009026	RM	0.17	1	70	6	3	3	12	5%	5%	0.300	0.150	0.150	0.600
5313009027	RM	0.18	2	70	5	3	3	11	5%	5%	0.275	0.138	0.138	0.550
5313009028	RM	0.18	1	70	6	3	3	12	5%	5%	0.300	0.150	0.150	0.600
5313009029	RM	0.18	2	70	5	3	3	11	5%	5%	0.275	0.138	0.138	0.550
5313009030	RM	0.17	2	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313009031	RM	0.23	4	70	6	3	3	12	5%	5%	0.300	0.150	0.150	0.600
5313009032	RM	0.20	2	70	6	3	3	12	5%	5%	0.300	0.150	0.150	0.600
5313009034	RM	0.76	1	70	26	13	13	52	5%	5%	1.300	0.650	0.650	2.600
5313012001	RM	0.18	4	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313012002	RM	0.16	2	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313012003	RM	0.40	4	70	12	6	6	24	5%	5%	0.600	0.300	0.300	1.200
5313012004	RM	0.39	9	70	9	5	5	19	5%	5%	0.475	0.238	0.238	0.950
5313012005	RM	0.14	2	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313012006	RM	0.12	2	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313012010	RM	0.13	1	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313012011	RM	0.25	2	70	8	4	4	16	5%	5%	0.400	0.200	0.200	0.800
5313012012	RM	0.04	1	70	1	0	0	1	5%	5%	0.025	0.013	0.013	0.050
5313012013	RM	0.08	1	70	2	1	1	4	5%	5%	0.100	0.050	0.050	0.200
5313012014	RM	0.10	1	70	3	1	1	5	5%	5%	0.125	0.063	0.063	0.250
5313012015	RM	0.12	1	70	4	2	2	8	5%	5%	0.200	0.100	0.100	0.400
5313012016	RM	0.15	1	70	5	2	2	9	5%	5%	0.225	0.113	0.113	0.450
5313012017	RM	0.10	1	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313012018	RM	0.10	1	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313012019	RM	0.12	2	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313012020	RM	0.12	2	70	3	2	2	7	5%	5%	0.175	0.088	0.088	0.350
5313012021	RM	0.16	1	70	5	3	3	11	5%	5%	0.275	0.138	0.138	0.550

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Additional Capacity Through Rezoning

As discussed throughout the Housing Element, the City is in the process of drafting the DTSP and making other zone changes to accommodate additional residential capacity throughout the city. The City is required to adopt the new Specific Plan and other zone changes as part of Programs 3.a, 3.b and 3.n. Table VI-5~~1~~, above, lists the parcels located within the Downtown Specific Plan, as well as ~~the High Density and Medium Density Residential zones~~ those in the Mixed Use Overlay and Housing Opportunity Overlay Zones, which are not otherwise included in the site specific analysis as part of Table VI-5~~0~~.

As part of the required rezoning, the City will increase the zoning capacity of Medium Density residential zones to 30 du/ac and of High Density residential zones to 45 du/ac. This increased capacity is sufficient to induce redevelopment of some portion of both of these zones at a high enough density to ensure the provision of housing affordable to lower income households.

Within the Downtown Specific Plan, it is anticipated that there will be two zones: the Mission Street Zone and the Fair Oaks Avenue Zone~~, the Huntington Avenue Zone, and the Ostrich Farm Zone~~.

~~Within the Mission Street Zone, it is anticipated that the maximum Floor Area Ratio will be 7.0, with an additional intensity bonus of up to a FAR of 7.5 available through community benefit incentives. The maximum building height for this zone is anticipated to be 84 feet and seven stories, once the citywide height limit is repealed or replaced in this area.~~

~~Within the Fair Oaks Avenue Zone, it is anticipated that the maximum Floor Area Ratio will be 10.0, with an additional intensity bonus of up to a FAR of 11 available through community benefit incentives. The maximum building height for this zone is anticipated to be 110 feet and 10 stories, once the citywide height limit is repealed or replaced in this area.~~

~~In addition, the area around Huntington Avenue and the Ostrich Farm will also be made into mixed-use zones either through inclusion into the Downtown Specific Plan or through a mixed-use overlay. The development standards in these mixed-use areas will mirror the standards of the Mission Street zone withing the DTSP.~~

~~The City understands not all of these sites will redevelop in the planning . It is anticipated that each parcel has a base likelihood to be redeveloped of 5%, with that likelihood being adjusted based on specific factors related to each parcel listed below.~~

- ~~Historic or Historic District: Site that are historic or located in a historic district are anticipated to be half as likely to be developed than non-historic sites. Properties that are historic or are located in a historic district are required to be reviewed by the City's Cultural Heritage Commission and are required to fulfill certain requirements as described in Section 6.5.2, *Governmental Constraints*, of the Housing Element. Because of these added constraints, historic properties are given a 50% development capacity adjustment.~~

- ~~Commercial Lot Utilization: Many of the sites in the Downtown Specific Plan are currently being used as commercial properties. However, there are a wide range of~~

~~intensity of uses within the area, with the existing uses being more economically viable the greater the intensity of use. Therefore, existing commercial uses at an intensity with a Floor Area Ratio of 2.0 or greater has been given a 50% development capacity adjustment.~~

- ~~**Recent Construction:** The vast majority of buildings within the Downtown Specific Plan Area are older than 20 years. It is anticipated that buildings constructed within the past 20 years are less likely to be redeveloped during the planning period. Buildings built within the past 20 years have been given a 50% development capacity adjustment.~~

- ~~**Environmental Constraints:** While the environmental condition of each site is not known, it is possible to anticipate that some sites will have environmental constraints that will require remediation based on the site's current or historic uses. Sites with known current and historic uses that are likely to require environmental remediation, such as gas stations and automotive service uses, have been given a 50% development capacity adjustment.~~

- ~~**Proximity to Transit:** The Downtown Specific Plan area is well served by transit. Sites that are located within ½ mile of a Major Transit Stop, as defined by Public Resource Code Section 21064.3, have been given a 150% development capacity adjustment. Projects on these sites will not be required to provide on-site parking once Program 3.b is implemented.~~

~~***Density ≥ 50 du/ac:** It is anticipated that sites with a higher allowed intensity will be more likely to be redeveloped due to the higher potential return on investment by the property owners and developers of these sites. Therefore, sites with a residential zoning capacity of 50 du/ac or more are given a 400% development capacity adjustment.*~~

Availability of Infrastructure

Existing City services, including water, sewer, and storm drain facilities are available to serve the development of new housing citywide. The Environmental Assessment being prepared for the Housing Element and the Environmental Impact Report being prepared for the General Plan and Downtown Specific Plan with consistent densities will further analyze the sufficiency of City services to address all of the units planned to comply with the RHNA. Dry utilities are also available to serve all the sites in the inventory. Connection to City services are always required as a condition of project approval in South Pasadena.

~~***Comparison of Site Inventory with RHNA***~~

~~**SCAG's 2021–2029 RHNA has allocated South Pasadena a total of 2,067 units for the planning period, which breaks down by affordability level as shown in Table VI-52. The table compares the site inventory capacity to the RHNA allocation by income group. As shown in the table, the City has identified sufficient sites to accommodate the RHNA of 2,067 units. Appendix A provides parcel-specific information and map illustrations for all sites addressing the lower-income RHNA.**~~

~~Table VI-52~~
~~COMPARISON OF SITE CAPACITY AND RHNA~~

(table moved and replaced by VI-44)

~~TOTAL RHNA~~	~~UNITS APPROVED SINCE 6/30/21~~	~~ADUS WITH APPROVED BUILDING PERMITS SINCE 6/30/21~~	~~PROJECTED ACCESSORY DWELLING UNITS~~	~~UNITS ON VACANT AND NON-VACANT SITES WITH SUITABLE ZONING (TABLE VI-44)~~	~~UNITS ON VACANT SITES NEEDING ZONING CHANGES (SITE 1 TABLE IV-50)~~	~~UNITS ON NON-VACANT SITES NEEDING ZONING CHANGES (TABLE IV-44 AND 50)~~	~~UNITS DUE TO REZONING (TABLE VI-51)~~	~~TOTAL CAPACITY~~	~~SURPLUS RHNA~~
~~757~~	~~0~~	~~1~~	~~45~~	~~0~~	~~70~~	~~522~~	~~533~~	~~1,332~~	~~177~~
	~~0~~	~~1~~	~~27~~						
~~398~~	~~0~~	~~3~~	~~130~~						
~~334~~	~~0~~	~~1~~	~~6~~	~~0~~	~~0~~	~~205~~	~~266~~	~~478~~	~~144~~
~~578~~	~~9~~	~~22~~	~~89~~	~~109~~	~~0~~	~~286~~	~~379~~	~~894~~	~~316~~
~~2,067~~	~~9~~	~~29~~	~~297~~	~~109~~	~~70~~	~~1,083~~	~~1,178~~	~~2,775~~	~~708~~

~~Note: The income levels assigned to the ADUs approved since June 30, 2021 are based on the SCAG ADU affordability analysis.~~

6.6.3 Financial Resources

A variety of federal, state, and local programs and other financial resources are available to either the City of South Pasadena or to developers of affordable housing to subsidize the cost of producing affordable housing. Table VI-5~~43~~ describes the available resources the City of South Pasadena may use in implementing the housing goals, objectives, policies, and program actions, as discussed Section 6.8 (Housing Plan).

Table VI-5~~43~~
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
1. Federal Programs		
Community Development Block Grant (CDBG)	Grants available to the City on a competitive basis for a variety of housing and community development activities. City competes for funds through the State's application process.	Acquisition Rehabilitation Homebuyer Assistance Economic Development Homeless Assistance Public Services
Federal Emergency Shelter Grants	Competitive grants to help local governments and nonprofits to finance emergency shelters, transitional housing, and other supportive services.	New Construction Rehabilitation Homeless Assistance Public Services
Home Investment Partnership Program (HOME)	Grants available to the City on a competitive basis for a variety of housing activities. City competes for funds through the State's application process.	Homebuyer Assistance Rehabilitation New Construction Rental Assistance
Housing Choice Voucher Program (Section 8)	Assistance program that provides direct funding for rental subsidies for very low-income families.	Rental Assistance
Section 202	Grants to private nonprofit developers of supportive housing for very low-income seniors.	New Construction
Housing Rehabilitation Program	Provides financial assistance to low-income homeowners for health and safety improvements.	Rehabilitation
Continuum of Care/Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH)	Funding through the HEARTH Act of 2009 to provide necessary resources for development of programs to assist homeless individuals and families.	Homeless Assistance New Construction
Housing Opportunities for Persons with AIDS (HOPWA)	The HOPWA program provides housing assistance and supportive services for low-income people with HIV/AIDS and their families.	Rental assistance
Home Investment Partnership Program (HOME)	Provides grants to local governments and nonprofit agencies, through the State of California, for many homeowner and renter needs.	Homebuyer assistance Rehabilitation New construction Rental assistance
2. State Programs		
Permanent Local Housing Allocation (PLHA)	PLHA provides a permanent source of funding for all local governments in California to help cities and counties implement plans to increase the affordable housing stock. The two types of assistance are: formula grants to entitlement and non-entitlement jurisdictions, and competitive grants to non-entitlement jurisdictions.	Predevelopment Development Acquisition Rehabilitation Preservation Matching Funds Homelessness Assistance Accessibility Modifications Homeownership Assistance Fiscal Incentives

Table VI-5~~4~~3
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Local Early Action Planning (LEAP) Grants	The Local Action Planning Grants (LEAP), provides over-the-counter grants complemented with technical assistance to local governments for the preparation and adoption of planning documents, and process improvements that: Accelerate housing production Facilitate compliance to implement the sixth-cycle Regional Housing Needs Assessment.	Housing element updates Updates to zoning, plans or procedures to increase/accelerate housing production Pre-approved architectural and site plans Establishing State-defined Pro-housing policies See complete list in program materials
SB 2 Technical Assistance Grants	Financial and technical assistance to local governments to update planning documents and zoning ordinances to streamline housing production, including but not limited to general plans, community plans, specific plans, implementation of sustainable communities strategies, and local coastal programs.	Technical assistance Planning document updates
Affordable Housing Partnership Program (AHPP)	Provides lower interest rate CHFA loans to homebuyers who receive local secondary financing.	Homebuyer Assistance
Building Equity and Growth in Neighborhoods (BEGIN)	A state-funded program administered by HCD which provides low- and moderate-income households up to $30,000 for a down payment.	Homebuyer Assistance
CalHome	Grants awarded to jurisdictions for owner-occupied housing rehabilitation and first-time homebuyer assistance.	Homebuyer Assistance Rehabilitation
Single Family Housing Bond Program (Mortgage Revenue Bonds)	Bonds issued to local lenders and developers so that below market interest rate loans can be issued to first-time homebuyers.	Homebuyer Assistance
Housing and Disability Advocacy Program (HDAP)	Services to assist disabled individuals who are experiencing homelessness apply for disability benefit programs while also providing housing assistance. HDAP has four core requirements: outreach, case management, disability advocacy, and housing assistance.	Rental assistance
No Place Like Home	Loans to counties or developers in counties for permanent supportive housing for those with mental illness who are homeless or at risk of homelessness.	New construction
Mental Health Services Act (MHSA)	Funding through MHSA of 2004 available to counties to spend toward mental health services.	New construction Special needs programs
Homeless Emergency Aid Program (HEAP)	A block grant program designed to provide direct assistance to cities, counties and Continuums of Care (CoCs) to address the homelessness crisis throughout California.	Identified homelessness needs Capital improvements related to homelessness Rental assistance
California Emergency Solutions and Housing (CESH)	Provides funds for activities to assist persons experiencing or at risk of homelessness. Program funds are granted in the form of five-year grants to eligible applicants.	Homelessness service system administration New construction Rental assistance
Low-Income Housing Tax Credits (LIHTC)	A 4% annual tax credit that helps owners of rental units develop affordable housing.	New Construction
3. Private Resources/Financing Programs/Regional Programs		
California Community Reinvestment Corporation (CCRC)	Nonprofit mortgage banking consortium designed to provide long-term debt financing for affordable multifamily rental housing. Nonprofit and for-profit developers contact member banks.	New Construction Rehabilitation Acquisition

Table VI-5~~4~~3
FINANCIAL HOUSING RESOURCES

PROGRAM NAME	DESCRIPTION	ELIGIBLE ACTIVITIES
Federal National Mortgage Association (Fannie Mae)	Fixed-rate mortgages issued by private mortgage insurers. Mortgages which fund the purchase and rehabilitation of a home. Low down payment mortgages for single-family homes in underserved low-income and minority cities.	Homebuyer Assistance Rehabilitation
Freddie Mac Home Works	Provides first and second mortgages that include rehabilitation loan. City provides gap financing for rehabilitation component. Households earning up to 80% MFI qualify.	Homebuyer Assistance
Affordable Housing Program (Federal Home Loan Bank)	Loans (and some grants) to public agencies and private entities for a wide variety of housing projects and programs. Participation is by FHLB participating lenders.	New Construction Homebuyer Assistance Rehabilitation Housing Supportive Services
San Gabriel Valley Regional Housing Trust	A joint powers authority to fund and finance the planning and construction of homeless housing, and extremely low, very low, and low-income housing projects.	New Construction

6.6.4 Opportunities for Energy Conservation

Title 24 of the California Administrative Code sets forth mandatory energy standards for new development. In turn, the home-building industry must comply with these standards and local governments are responsible for enforcing the energy conservation regulations. The City enforces all applicable state and federal laws relative to energy conservation.

Over the past eight years since adoption of the last housing element, South Pasadena has become a Certified Green Zone City (in 2016), and initiated a water conservation program with rebates and programs that contributed to a five-year reduction of 18% in water use, which translates to a reduction in energy use. In 2020, the Council adopted a Climate Action Plan (CAP) as a long-range planning document that guides the City towards a target of carbon neutrality by 2045, which aligns with the State's overall climate goals. The Housing Plan also includes a longstanding policy to promote energy-efficient building and Program 1.a requires compliance with Title 24 through energy-saving building techniques in new construction and encouragement to retrofit existing housing when opportunities arise to do so. The City's website directs residents to San Gabriel Valley Energy Wise Partnership's EASY Program (Energy Assessment Screening for Your Home), which provides homeowners with free energy assessments to identify opportunities to reduce their energy usage and bills. The Partnership's website consolidates information about rebates and programs available to San Gabriel Valley residents to become more energy efficient. Through the Partnership, the City collaborates with other agencies in the region when there is funding available to offer incentives for energy-saving upgrades.

As part of the City's commitment to protecting the environment and building resiliency, South Pasadena chose to utilize Clean Power Alliance as the City's residential electricity provider in February 2019, and commercial electricity provider in May 2019. The City selected 100% Green Power as the default option for residential customers, which provides 100% renewable energy through South

California Edison's (SCE) electrical infrastructure. In 2021, 95% of residents subscribed to the 100% Green Power option.

The City promotes energy conservation through public information provided on the City's website and at City Hall. Topics include energy-saving xeriscapes, energy rebates, and installation of solar power to produce clean energy.

6.7 REVIEW OF 2014-2021 HOUSING ELEMENT PAST PERFORMANCE

An important step in developing future housing strategies that meet the community's needs is an evaluation of the success of prior Housing Element programs. This section complies with the requirement to assess the City's progress in implementing the adopted housing programs and facilitating construction of new housing units based on South Pasadena's RHNA allocation.

Building the RHNA

South Pasadena was allocated 63 units in the 2014-2021 RHNA. The table below compares the RHNA to actual units permitted through 2020, with six months remaining in the RHNA period. Based on Building permits issued, 112 new units were permitted during the first seven years of the period, far exceeding the above moderate RHNA allocation. However, only four units were in the affordable housing categories. The year 2020 saw a major increase in Planning entitlement approvals (not reflected in this table), with projects including 143 units comprised of two larger multi-family projects, new single-family homes and 17 ADUs. Among these was City's first density bonus project on Fair Oaks Avenue with 86 units, of which 13 will be deed-restricted for low-income households. Because building permits for these projects were not issued prior to June 2021, they will be counted toward the 2021-2029 RHNA.

Table VI-554
COMPARISON OF 2014-2021 RHNA AND UNITS PERMITTED

INCOME LEVEL	RHNA ALLOCATION	UNITS PERMITTED 2013-2020	REMAINING ALLOCATION
Very Low	17	1	16
Low	10	3	7
Moderate	11	1	10
Above Moderate	25	113	-
Total	**63**	**118**	**33**

Source: City of South Pasadena Annual Progress Reports, HCD, 2021

Housing Plan Programs

In the table below, achievements of the 2014-2021 Housing Element are compared with the Eight-year Objectives for the 5th cycle housing element programs. The progress made since 2014 is analyzed to provide the basis for evaluating whether to continue, amend or remove programs as part of the comprehensive housing program strategy for this housing element. These results are quantified wherever possible or provided as qualitative description where necessary. Continuing successful and relevant programs, in combination with newly identified programs designed to increase housing production to comply with the new RHNA for this housing element form the basis for the Housing Plan (Section 6.8).

Although the City's resources and staffing are limited, efforts were made to address the housing needs of lower income and special needs groups as opportunities were identified. The City received additional support during the year and a half in which a state and local emergency was declared due to the COVID-19 pandemic. The following are some of the highlights of the City's accomplishments toward supporting low income and special needs residents:

- All Special-Needs Groups:
    - Housing Choice Vouchers: Information about Section 8 vouchers has been added to the City's website. There is a link at this South Pasadena City webpage to Los Angeles County's website related to vouchers: https://www.southpasadenaca.gov/residents/housing/

      The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program.

      HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.

    - Inclusionary Housing: The City adopted Inclusionary Housing Regulations in spring 2021 that apply to all projects of three or more units. These regulations will result in the creation of new lower- and moderate-income units to serve a variety of households.
- Seniors:
    - The 625 Fair Oaks Senior Housing project was approved in March 2020. It took advantage of the technical assistance offered by the City, as noted in the existing Housing Element Planning Assistance and Permit Processing Program. This project has a total of 86 units with 13 units affordable for low-income households.
- Unhoused Persons:
    - The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan to support unhoused individuals in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants prepared the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region.

- In response to the COVID-19 pandemic, the City received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments, and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents.
- Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.
- The City adopted an amendment to the Zoning Code to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. The City will amend that section of the Zoning Code further to fully comply with current state law.
- The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. There are still some zoning districts that do not allow transitional and supportive housing where single-family housing is allowed. This program will be amended and continued to fully address state law regarding transitional housing and to address new state law since 2014 (Assembly Bill 2162) regarding supportive housing.

Table VI-55 describes the City's progress in implementing the 2014-2021 Housing Element programs.

Table VI-5~~6~~5
2014-2021 HOUSING ELEMENT PROGRAM PERFORMANCE

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Energy Efficiency Program This CDBG-funded program provides grants to assist low- and moderate-income households in the community with funding for necessary energy saving home repairs and improvements. A household may be eligible to participate in the program as long as they are homeowners with dwellings of two units or less and meet the income limits established for the program. **Eight-year Objective:** The City will continue to use CDBG funds to provide housing rehabilitation (as that term is defined by HUD) assistance for low- and moderate-income homeowners for energy saving home improvements. The City's objective is to assist one lower income household during the 2014-2021 planning period.	The City has not pursued Community Development Block Grant (CDBG) funding for rehabilitation and energy-saving upgrades since adoption of the previous Housing Element. The City does continue to apply for CDBG funds but no CDBG money has been used for housing assistance. The energy-efficiency program was defunded many years ago. Participation was low (cancelled due to lack of interest). Currently, a small percentage of CDBG funding goes to the senior lunch program and the rest is used for sidewalk improvements. For the 2021-2022 year, the City is reallocating funds to increase programs that support housing. Aside from the senior lunch program, approximately $104,000 will be allocated for housing programs, including residential code enforcement and housing rehabilitation programs for code compliance/modernization and energy efficiency. The intent is to establish the program(s) and develop public outreach tools to reach eligible residents and maximize participation to use the resources. Once established, the program could be funded annually by CDBG. The Code Enforcement effort would focus on occupancy inspection that would result in more enforcement of housing maintenance and support for displaced tenants. The City has updated policies related to facilitating green design and building techniques as part of the General Plan Update, which is currently underway.	Amend and continue with current energy-related program.
Planning Assistance and Permit Processing The City provides technical assistance to potential developers of new housing in the City and offers a streamlined design review process. Additionally, the City's Zoning Code includes provisions for approval of a planned development permit which allows for modifications to certain zoning requirements for projects which include affordable housing and the granting of density bonuses and incentives and concessions for projects which meet the affordable housing requirements of the Zoning Code.	The City continues to implement this program. For example, the 625 Fair Oaks Senior Housing project took advantage of the technical assistance provided by this program. This project was approved by the Planning Commission on March 10, 2020. It has a total of 86 units with 13 units affordable for low-income households.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight Year Objective: Facilitate review of development proposals which include affordable housing and continue to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. The City's objective is to assist in the provision of 25 above moderate income housing units during the 2014-2021 planning period.		
Housing Development Program This program relies on the availability of state financial assistance to developers from sources such as tax credits and CHFA for development of new affordable housing. The City will provide Notices of Funding Availability (NOFA) information to developers when NOFAs become available and facilitate review of projects linked to these funding applications. **Eight Year Objective:** Facilitate review of development proposals which are linked to applications for funding by a State or Federal agency. The City's objective is to provide information to developers to promote development of 10 units of low and 11 units of moderate-income housing units during the 2014-2021 planning period.	No applications with tax credit financing or other state or federal financing have been reviewed or approved since adoption of the previous Housing Element. However, the City has participated in the creation of the San Gabriel Valley Regional Housing Trust (SGVRHT) in 2020 to provide a full-service agency to support more affordable housing development in the city and region and information is provided to developers through them. The City contributed $115,000 toward the development of the SGVRHT and pays an annual membership fee to support administration costs. The City's proposed inclusionary housing ordinance provides for the City to transfer in-lieu fee payments into the regional fund to be leveraged for more affordable housing funds in regional projects, to which South Pasadena affordable housing developers will have access.	Amend substantially to reflect current City efforts and continue.
CalHome Program This program is a State Housing and Community Development program providing funds for home ownership programs to assist low and very low-income households become or remain homeowners. **Eight Year Objective:** Provide information to low and very low-income households for funding within the timetables established by the State Department of Housing and Community Development funding when funding is made available to the City. The City's objective is to provide information to households whenever possible in order for a minimum of one low income and one very low-income household to receive assistance during the 2014-2021 planning period.	The City continues to provide information about CalHome and conducts outreach through its contracted housing rights and tenant protection agency. They serve as the main source of this type of information and support for South Pasadena residents.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Section 8 Rental Assistance The Los Angeles County Community Development Commission funds Section 8 rental assistance to eligible renter households and to eligible homeless facilities and individuals. This program provides housing subsidy payments to households at or below 50% of the median income for two or more persons living together, elderly, and disabled persons. **Eight-year Objective:** Continue to assist South Pasadena renters with housing subsidy payments through the Section 8 rental assistance program by referring renters to the County agency responsible for administering this program. The City's objective is to provide information to low and very low income households whenever possible during the 2014-2021 planning period.	Information about Section 8 vouchers has been added to the City website. There is a link at this City webpage to Los Angeles County related to vouchers: https://www.southpasadenaca.gov/residents/housing/ The "Housing" webpage is being relaunched as the Housing Support webpage with more specific references and connection to the City's contracted housing rights and tenant protection agency and to Los Angeles County's Housing Voucher program. HUD currently allocates 25,199 Housing Choice (Section 8) Vouchers to the Los Angeles County Development Authority (LACDA). The LACDA is currently providing rental assistance to 23,196 families throughout Los Angeles County. Each family represents a voucher in use. The LACDA does not have vouchers specifically allocated for use in the City of South Pasadena. There are currently 10 LACDA Housing Choice Voucher holders that reside in the City of South Pasadena.	Continue.
Housing Acquisition and Rehabilitation A number of surplus housing units resulted from the change in the proposed route of the extension of the 710 Freeway. The City monitors the status of these properties in order to identify any properties deemed surplus by Caltrans and monitors opportunities for their acquisition and rehabilitation by non-profit developers as affordable housing. **Eight-year Objective:** The City's objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.	Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. Funding has been secured for a feasibility study on surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H).	Amend to address accomplishments and continue.
Density Bonus for Affordable Housing The City's Zoning Code provides for the use of density bonuses as a developer incentive to provide affordable housing in new developments. The General Plan contains a policy to consider the development of	The Senior Housing project at 625 Fair Oaks was approved in 2020 and received a 35-percent density bonus. It will have 86 units with 13 units reserved for low-income households. The City has updated its density bonus ordinance in compliance with changes in state law. In May, in conjunction	Amend to address updates to state law and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
residential units in excess of the General Plan limits if the units are ownership units affordable to low- or moderate-income households. **Eight-year Objective:** Provide technical assistance to developers of affordable residential projects by providing Zoning Code information on the possible use of density bonuses and incentives and/or concessions to assist in the development of affordable housing. The City's objective is to provide information to developers regarding the use of the Affordable Housing Incentives provisions of the Zoning Code whenever possible during the 2014-2021 planning period to assist with development of 21 lower income units and 5 moderate income units.	with adoption of an inclusionary housing ordinance, the City incorporated streamlined approval for waivers in conjunction with the density bonus for projects that include on-site inclusionary housing. City staff regularly provides assistance to applicants considering proposing projects using the density bonus.	
Homeless Services The City will continue its emergency shelter referral program administered through the Police Department and investigate entering into participation agreements with neighboring cities and/or Councils of Governments that operate emergency shelter programs to expand homeless services to the homeless population in South Pasadena. **Eight-year Objective**: The City will continue ongoing referral services through its Police Department assisting homeless individuals to obtain emergency shelter and will continue to evaluate the possibility of entering into participation agreements with other cities and/or Councils of Governments providing emergency shelter programs.	The City received a $30,000 grant from Los Angeles County and United Way of Greater Los Angeles to hire a consultant to develop a plan for homelessness, in conjunction with a larger effort with the San Gabriel Valley Council of Governments (SGVCOG). Lesar Development Consultants were hired to prepare the plan on behalf of the City in 2018. It was unanimously adopted by Council on June 12, 2018. Accordingly, the City was eligible to apply for and receive Measure H grant funds from Los Angeles County as well as homelessness grant funding from the SGVCOG. Programs are currently being implemented in partnership with others in the San Gabriel Valley region. In response to the COVID-19 pandemic, the City has received $165,000 to implement emergency programs to address the needs of unhoused individuals, including motel vouchers, housing placement services, clean up, facilities and safety measures for encampments and cash assistance to people at risk of becoming homeless. In addition, funding in the amount of $73,528 was allocated to South Pasadena's ERAP program, which provides one-time rental assistance to eligible low-income residents. Also, in response to the pandemic, the Cities of South Pasadena and Arcadia received a multi-jurisdiction grant from Los Angeles County (Measure H) to provide motel vouchers, a shared case manager to help the homeless navigate resources, including temporary and permanent housing opportunities, and rapid re-housing assistance to help with temporary rental assistance and/or utility payments.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Senior Housing The City's Senior Citizen Commission has suggested that the City explore the potential for the reuse and redevelopment of existing apartment buildings for seniors to expand housing opportunities for seniors. **Eight-year Objective**: The City will encourage developers proposing to rehabilitate existing apartment buildings to consider rehabilitation and reuse of the existing apartment buildings as affordable senior housing whenever possible.	The City has continued to seek a developer for a City-owned site for senior housing using approximately $500,000 of set aside money from the former redevelopment agency.	Continue.
Vacant Sites The Housing Element identifies vacant sites and vacant sites approved for development in the City with the capacity for development of up to 192 new residential dwelling units. The City will maintain the inventory of vacant sites and work with future developers of these sites in early consultations to encourage the development of affordable units on these sites as part of any project proposal and maintain adequate zoning to make feasible the development of housing for a variety of income levels. **Eight-year Objective:** Continue to maintain an inventory of vacant and underdeveloped sites for development of new affordable housing. Maintain zoning adequate to allow for the private development of 17 very low, 10 low income, 11 moderate income, and 25 above moderate-income housing units.	No re-zonings have occurred that have downzoned the identified available sites. The City continues to maintain the list of vacant sites for housing.	Amend and continue.
Mixed-Use Developments and Adaptive Re-Use The City's Zoning Code permits the reuse and new development of housing above ground floor uses in commercial districts and in the Mission Street Specific Plan Area providing opportunities for development of affordable housing. The 1998 General Plan also states policies to encourage the development of mixed use projects within targeted areas of the city. As part of a mixed use residential and commercial development project the provisions of the Zoning Code for affordable housing incentives could be utilized in projects which include units for very low, low, and moderate income households. Additionally, developers of affordable housing may seek relief from the strict application of the Zoning Code regulations through approval of a planned development permit which allows for flexible application of Zoning Code regulations.	The Mission Bell mixed-use project was approved by the Planning Commission on February 11, 2020. The project will be three stories and will include 36 market-rate condominiums, commercial retail space, and subterranean parking. Existing commercial buildings on the site with businesses in them will be demolished to facilitate project development. One historic structure dating to 1921 will be partially retained and incorporated into the project design. The approved 625 Fair Oaks Senior Housing project described under previous programs is also located in a mixed-use district. A revised General Plan and Specific Plan to implement increased mixed-use development with more housing opportunities have been drafted and public meetings have been held to gather community input. Programs have been	Amend and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: Continue to promote the development of housing units above ground floor commercial uses on vacant properties located within the City's commercial districts through the mixed use development provisions of the Zoning Code and on vacant and reused properties located in the Mission Street Specific Plan area. Expedite permit processing for mixed use projects which include affordable housing and assist developers with the application of the planned development permit and Affordable Housing Incentives provisions of the Zoning Code to projects to maximize the potential for a project to include affordable housing. Promote the use of the density bonus and notify developers of available sites for development of affordable housing. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.	included in the draft programs section to further facilitate housing in the mixed-use areas.	
Residential Second Units The Zoning Code permits the construction of residential second units in the RE, RS, and RM zoning districts. **Eight-year Objective:** Facilitate development applications for residential second units to promote this housing type as an affordable housing alternative. The City's objective is to facilitate application review to promote development of three residential second units during the 2014-2021 planning period.	The City updated its ADU regulations in Section 36.350.200 in 2016 and 2019 to comply with changes in state law and a more comprehensive update in 2021 addressed issues that had added complexity to ADU approval in order to further facilitate ADU production. Although the 5th Cycle objective for residential second units was low, ADUs have become a much more significant component of the housing strategy over the past eight years. In 2017, the Planning Division approved only one accessory dwelling unit (ADU); in 2018, 4 ADUs were approved; in 2019, 7 ADUs were approved; and in 2020, 8 ADUs were approved. Following the City's adoption of a new ADU ordinance in mid-2021, the number of building permits for ADUs increased substantially to 32 building permits in 2021. At the close of this housing element period, a second Code revision (Phase 2 for historic properties) was adopted in order to better facilitate ADUs on those properties, which is expected to further increase the applications and issuance of building permits for ADUs.	Amend and continue.
Land Use Controls 1. The City's Zoning Code currently includes requirements for approval of a conditional use permit as part of the approval of a planned development permit. In addition, the Zoning Code establishes a 12 month validity period for an approved planned development permit.	<u>Objective 1:</u> Ordinance 2253 amended the Zoning Code to remove the conditional-use permit (CUP) requirement on October 2, 2013. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. <u>Objective 2:</u> The City adopted an amendment to the Zoning Code to delete language establishing buffer distance	Objective 1. Delete. Objective 2. Amend and continue. Objective 3. Amend to reflect accomplishments and continue. Objective 4. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: The City will adopt an amendment to the Zoning Code within one year following the approval of the Housing Element to eliminate the requirement for approval of a conditional use permit for development projects which request and qualify for approval of a planned development permit and to extend the term for an approved planned development permit to a period of 36 months with the potential for approval of an extension for an additional 36 months. 2. In accordance with State Law, Zoning Code regulations establishing buffer distances for an emergency shelter are limited to the establishment of a 300 foot separation distance between emergency shelters, and Zoning Code regulations governing the operations of emergency shelters should provide that adequate beds are available to accommodate the City's homeless population. **Eight Year Objective**: The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to delete language establishing buffer distance requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 16 beds. 3. In accordance with State Law, Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. **Eight Year Objective:** The City will adopt an amendment to the Zoning Code within 24 months following approval of the Housing Element Update to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. 4. With the adoption of the Zoning Code Amendment permitting SROs "by right" in the BP zoning district, specific development regulations were also adopted to govern development of SROs which establish location requirements that SRO's not be located any closer than 300 feet to one another or within 300 feet of a residential use, public park, or public school, establishes a minimum lot size of 10,000 square feet and a maximum density of one unit per 1,600 square feet of gross floor area, establishes setback requirements, and includes requirements for parking, provision of common area open space, showers, cooking	requirements between an emergency shelter and any public park, school, or residential use and to establish the maximum number of beds permitted in any one emergency shelter at 12 beds. Ordinance 2251, Adopted 9-4-2013, made changes to the Emergency Shelters section. Objective 3: The City adopted an amendment to the Zoning Code to add clarifying language to the Zoning Code definition of residential projects to include transitional and supportive housing. Clarification to define these as residential uses was included in Ordinance 2251 in 2013. Nearly all residential districts in the city permit transitional and supportive housing by right (P-permitted), subject to specific use regulations. However, some residential and commercial zoning districts do not allow transitional and supportive housing. This program will be amended and continued to ensure that all required zones allow these uses. The new, mixed-use zoning districts that are planned will also comply with State law. Objective 4: The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. Objective 5: The City adopted an amendment to the Zoning Code related to the planned development permit process. This process was used to allow conversion of four historic rental bungalows to separate ownership units, one with a covenant for a moderate-income household. The City continues to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. In addition, a ministerial process allows flexibility for projects using the streamlined density bonus provisions associated with the inclusionary housing requirements. Objective 6. This program has not yet been implemented. It is scheduled to begin after the General Plan Update is complete.	Objective 5. Amend to address completed portions of the program and continue. Objective 6. Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
facilities, toilets, storage facilities, and security lighting. All SRO facilities are required to submit a management and operations plan for review by the Director of Planning and Building prior to occupancy and operations. **Eight Year Objective:** With the adopted 2013 Zoning Code Amendment to allow emergency shelters and SRO's as permitted uses ("by right") in the BP zoning district, to specifically list transitional and supportive housing as a permitted use in all residential districts, and with the adoption of the Zoning Code Amendments provided for in Housing Element Update program objectives for the 2014-2021 planning period, sufficient sites will be available for development of these housing types. 5. The Housing Element promotes flexibility in residential development standards as a way to reduce costs of development thereby promoting affordability in design. The City uses the Administrative Modification provisions of the Zoning Code as a means of providing flexibility in development standards including setbacks, open space requirements, and height requirements. **Eight Year Objective:** The City will continue to implement the Administrative Modification Process to provide for flexibility in the application of development standards for affordable housing projects. 6. The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing development developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations. **Eight-year Objective:** The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process as provided for in the Zoning Code. 7. The City's Senior Citizen Commission has suggested that a policy be adopted to require that a percentage of all new multifamily residential projects in the City be developed as universally accessible units.		

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Eight-year Objective: The City will explore options for requiring that new residential development projects of a certain size include a percentage of the units to be universally accessible.		
Provision of Technical Assistance to Developers of Affordable Housing The City's Planning & Building Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Planning & Building Department provides the same assistance to developers of affordable housing to assure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. **Eight-year Objective:** Continue to provide information on State and Federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to provide information to developers to promote development of 17 units of very low, 10 units of low, and 11 units of moderate income housing units during the 2014-2021 planning period.	City staff work with developers of housing projects on a regular basis to assist them in the planning process. While some disruption has occurred due to staffing turnover during the planning period, housing projects are supported through the planned development application process and over the past year, more focus has been put on streamlining and expediting the permit process, as evident in the entitlement of three major residential projects in 2020. In September 2020, the zoning code was amended to streamline the design review process. The City is improving its application materials to support complete application filings. The City has established a Virtual Planning Desk web page with information and updated application forms, and has a scheduled application intake process to ensure that applications are submitted with all requirements to streamline the approval process. The City has joined with regional partners to create the San Gabriel Valley Regional Housing Trust, and affordable housing developers applying for South Pasadena projects are able to access their support services and leverage local, state, and federal funding. ADUs are a growing source of units that may meet the needs of moderate income households. The ADU zoning regulations were updated in 2021 to provide standards and clarify processes in compliance with State ADU laws. The City has prioritized faster processing through a combination of improved applications and instructions, a brochure available on-line and additional Planning staff to facilitate homeowner interest in building these units.	Continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
Fair Housing Program The City of South Pasadena refers fair housing complaints to the San Gabriel Valley Fair Housing Council (SGVFHC). The role of the SGVFHC is to provide services to jurisdictions and agencies, as well as the general public, to further fair housing practices in the sales or rental of housing. Services provided by the SGVFHC include responding to discrimination complaints, landlord/tenant dispute resolution, housing information and counseling, and community education programs. **Eight-year Objective:** Continue to provide information on fair housing practices and refer housing complaints to the SGVFHC as needed. Provide information on fair housing practices and resources on the City's web site. Implement Zoning Code procedures for reasonable accommodation for housing for persons with disabilities, on a case by case basis, in order to promote equal access to housing.	The City renewed and expanded their contract with SGVFHC (now the Housing Rights Center) to offer (1) Discrimination Complaint Investigations; (2) Landlord/Tenant Fair Housing Counseling and Meditation; (3) Outreach and Education; (4) Advocacy; and (5) Enforcement and Impact Litigation. The City began receiving funds through the Permanent Local Housing Allocation (PLHA) Senate Bill 2 funding ($74,651 for first year) in February 2021. This is a new permanent Eviction Defense Program that Los Angeles County will administer on behalf of participating cities. This is funded through the state's real estate transaction recording fees so the funding will fluctuate from year to year. The Eviction Defense Program will provide comprehensive legal services to households with an Unlawful Detainer (UD) or an eviction complaint, case management for individuals with a UD or eviction complaint to help stabilize their housing, short-term financial assistance to help pay for rental arrears, and know-your-rights workshop and clinics. The City will continue these efforts along with expanding their fair housing efforts to address new state law requirements under Assembly Bill 686.	Amend and continue.
Promote Energy Conservation The City will explore policies and possible Zoning Code Amendments to provide incentives for new "green" development in the City. The application of green design and construction principals could result in the development of smaller, compact residential projects with the potential to achieve a greater economy of scale thus lowering construction costs and providing an opportunity for development of affordable housing. Green design and building principals applied to new development also incorporate energy saving techniques thereby lowering the cost of utilities for residents. **Eight-year Objective:** The City will explore amendments to the Zoning Code to provide incentives for the development of energy saving residential development including deviations or waivers from compliance with established development standards as part of a development proposal involving either adaptive reuse of existing buildings or the construction of new residential units. Such deviations or waivers may include a reduction in the minimum required lot area for all housing types, an increase from the established maximum floor area ratio and other similar standards. The City will explore amendments to the Zoning Code to implement "green" building	Policies are being developed as part of the General Plan Update, currently underway.	Combine with Energy-Efficiency Program and continue.

2014-2021 HOUSING ELEMENT PROGRAMS	PROGRESS OF PROGRAM SINCE 2014	APPROPRIATENESS TO CONTINUE IN THE 2021-2029 HOUSING ELEMENT
design guidelines and development standards, including the use of solar energy, to reduce energy costs to residents. The City will continue the on-going programs to promote energy conservation in existing structures in the City which include maintaining information on the City's website that provides the public with resource information on energy saving xeriscapes, State energy grants, energy rebates, and use of solar power as an energy alternative for homes. Additionally, Southern California Edison offers public information and technical assistance to developers, homeowners, and apartment owners on energy conservation measures and programs.		

6.8 HOUSING PLAN AND QUANTIFIED OBJECTIVES

This section presents the Housing Plan (Plan) for the 2021-2029 planning period. This Plan sets forth South Pasadena's goals, policies, and programs to address the City's identified housing needs.

6.8.1 Goals, Policies, and Programs

The City of South Pasadena, in adopting the Housing Element, adopts the following goals, policies and programs as the framework for addressing the housing needs of the community over the timeframe of the 2021-2029 Housing Element, with the programs defining the specific actions the City will undertake to meet those needs. According to Section 65583 of the Government Code, a city's housing programs must address the following five major areas:

- Conserving the existing supply of affordable housing;
- Assisting in the provision of housing;
- Providing adequate sites to achieve a variety and diversity of housing;
- Removing governmental constraints as necessary; and
- Promoting equal housing opportunity.

The goals for South Pasadena's housing plan parallel these five areas defined in the Government Code. Furthermore, South Pasadena's housing plan includes a sixth goal aimed at ensuring housing stability and affordability for renters, who make up more than half of South Pasadena's population. The housing programs described on the following pages include existing programs as well as new programs added to address the City's identified housing needs. The housing plan is also included in table format in the Executive Summary of this document.

GOAL 1.0 Conserve the Existing Housing Stock and Maintain Standards of Livability

Conserve and maintain the existing housing stock so that it will continue to meet livability standards and sustain the community's housing needs.

Policy 1.1 Adopt and implement Zoning and Building Code standards and provide incentives for building owners to upgrade energy conservation in existing buildings including the use of solar energy, to reduce energy costs to residents.

Policy 1.2 Promote rehabilitation, as that term is defined by the U.S. Department of Housing and Urban Development (HUD), and home improvement assistance to low- and moderate-income households.

Policy 1.3 Continue to use the City's code enforcement program to bring substandard units into compliance with City codes and improve overall housing conditions in South Pasadena.

Program 1.a - Energy Efficiency

The City will continue to implement Title 24 of the California Code of Regulations on all new development and will continue to ensure that local building codes are consistent with State-mandated or recommended green building standards. The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources. The City will make handouts and literature available to the public outlining measures that they can take to reduce energy use and programs available to residents, including San Gabriel Valley Energy Wise Partnership, SoCalGas, Southern California Edison, and Clean Power Alliance programs.

Eight-year Objective: Ensure consistency with State green building standards triennially when the California Building Code is adopted.

Funding Source: General Fund; grants

Responsible Agency: Community Development Department, Public Works Department

Timeframe: Every three years; next building code adoption expected in 2023.

Program 1.b – Convert Caltrans Homes to Affordable Housing

The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties.

The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB 381 that respond to the cost constraints of particular properties.

SB 381 allows the City to sell identified historic homes at fair market value, but requires that the City use the proceeds from the sale to provide three affordable units for each home sold at fair market value. Additionally, if the City purchases non-historic surplus properties from Caltrans, SB 381 provides the City the option to sell the properties to moderate or lower income households, or rent the properties to lower income households.

Additionally, the City may consider the construction of additional units, either as ADUs or Missing Middle housing, on certain parcels to provide additional lower income units if feasible. These

additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.

Eight-year Objective: Acquire and convert unoccupied, Caltrans-owned properties that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Maximize the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.

Funding Source: General Fund; HRE; public (federal, state, regional) grants, loans, and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)

Responsible Agency: Caltrans; Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State ;target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

Program 1.c - Housing Rehabilitation and Code Enforcement

The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions in the Southwest Monterey Hills neighborhood and other neighborhoods with the oldest housing stock identified in the 2022 survey (Table VI-26), or as subsequently identified, to reduce displacement risk of tenants living in currently substandard housing.

The City will continue to monitor opportunities and pursue funds annually, as available, through state and federal programs for rehabilitation to improve existing housing units serving lower-income households and will work with the private sector and nonprofit agencies to implement projects when opportunities arise. The City will also continue the code enforcement program to identify and correct situations of unsafe or dilapidated housing units. When violations are cited, code enforcement will offer property owners information to help them correct the identified deficiencies.

To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge.

Eight-year Objective: Correction and abatement of all identified Code violations; with particular effort to address the 46 units identified as needing moderate or higher level repairs to reduce displacement risk for current occupants.

Funding Source: HOME, PHLA, program fees collected by covered rental property owners, others

Responsible Agency: Community Development Department, City Manager's Office

Timeframe: Correction of all properties needing more than minor rehabilitation by 2026; correction of all substandard conditions by 2029. Propose Rental Housing Inspection Program to City Council by October 2024.

Program 1.d – Assisted Housing Unit Preservation

The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives. Note, that the City has not been tracking any affordable housing units with deed-restrictions and/or subsidized funding. The list will include, at a minimum, the project address; number of deed-restricted units, including affordability levels; associated government program; date of completion/occupancy; and the date on which the units are at risk to convert to market-rate. The City will work to reduce the potential conversion of any units to market rate through the following actions:

- Monitor the status of affordable projects, rental projects, and manufactured homes in South Pasadena. Should the property owners indicate the desire to convert properties, consider providing technical and financial assistance, when possible, to incentivize long-term affordability.
- If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources.

Pursuant to State law (Government Code Sections 65853.10, 65863.11, and 65863.13), owners of deed-restricted affordable projects are required to provide notice of restrictions that are expiring to all prospective tenants, existing tenants, and the City within 3 years, 12 months, and 6 months before the scheduled expiration of rental restrictions. In addition, the City or owner will provide notice to HUD, HCD, and the local legal aid organization. Owners shall also refer tenants of at-risk units to educational resources regarding tenant rights and conversion procedures and information regarding Section 8 rent subsidies and any other affordable housing opportunities in the City. In addition, notice shall be required prior to conversion of any units to market rate for any additional deed-restricted lower-income units that were constructed with the aid of government funding, that were required by inclusionary zoning requirements that were part of a project granted a density bonus, or that were part of a project that received other incentives.

If a development is offered for sale, HCD must certify persons or entities that are eligible to purchase the development and to receive notice of the pending sale. Placement on the eligibility list will be based on experience with affordable housing.

When necessary, the City shall continue to work with property owners of deed-restricted affordable units who need to sell within 55 years of the unit's initial sale. When the seller is unable to sell to an eligible buyer within a specified time period, equity-sharing provisions are established (pursuant to the affordable housing agreement for the property), whereby the difference between the affordable and market value is paid to the City to eliminate any incentive to sell the converted unit at market rate. Funds generated would then be used to develop additional affordable housing within the City. The

City shall continue tracking all residential projects that include affordable housing to ensure that the affordability is maintained for at least 55 years for owner-occupied units and 55 years for rental units, and that any sale or change of ownership of these affordable units prior to satisfying the 45- or 55-year restriction shall be "rolled over" for another 45 or 55 years to protect "at-risk" units.

Eight-year Objective: Preserve at least five units and any additional units that are subject to this program. Ensure communication with property owners, particularly when ownership changes.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing.

Program 1.e – Environmental Health

Environmental health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually, or by request, with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino to bring the CalEnviroScreen percentile score below the 70th percentile impaired drinking water. As needed, the City will provide assistance to water providers to apply for funding for necessary improvements. Additionally, the City will review and revise, as necessary, siting and mitigation requirements for industrial and other uses that may contribute to contamination from diesel particulate matter exposure which is concentrated in the northern portion of South Pasadena north of Mission Street, and groundwater contamination which is isolated in the southeastern portion of the City south of Mission Street and east of Meridian Avenue to reduce the impact of these in areas with the highest scores to below the CalEnviroScreen 50th percentile.

Eight-year Objective: Determine whether there are existing sources of water contamination and mitigate as appropriate in identified areas to bring the CalEnviroScreen percentile impaired drinking water score below the 70th percentile; and groundwater and diesel particulate matter scores in identified areas below the 50th percentile.

Funding Source: General Fund

Responsible Agency: Public Works Department

Timeframe: Meet with water providers by December 2022 to develop strategies and review siting and mitigation requirements by June 2023.

GOAL 2.0 Encourage and Assist in the Provision of Affordable Housing

Facilitate the development of deed-restricted affordable housing units in locations distributed throughout the city in order to provide housing for a diverse community, including low-income households that are least able to afford adequate housing.

Policy 2.1 Use local, regional, and state funding to assist in development of new multifamily housing for low- and moderate-income households.

Policy 2.2 Provide information to developers regarding the City's inclusionary housing requirements and the availability of streamlined density bonus opportunities in compliance with incentives for well-designed housing and implement approval processes that reflect the priority of providing housing in the community.

Policy 2.3 Provide residents with information to receive rental assistance, including housing vouchers, from the County of Los Angeles and other support for tenants from the City's contracted housing rights and tenant protection agency.

Policy 2.4 Consider declaring publicly-owned sites as "Surplus" and offering development opportunities on those sites to non-profit affordable housing developers.

Policy 2.5 Provide adequate access to housing that supports educational and economic opportunities for all, as well as transit options and a walkable lifestyle.

Program 2.a – Provide Technical Assistance for Projects with Affordable Housing

The City's Community Development Department currently offers handout materials and provides assistance to applicants to guide them through the Design Review process and the discretionary and ministerial permit process. The Community Development Department provides the same assistance to developers of affordable housing to ensure that applications for affordable housing projects are processed in a timely and expeditious manner and also provides information on state and federal financial assistance programs and other available assistance to facilitate development of affordable housing. Prior to permit application, staff will advise on the City's Zoning Code provisions for approval of a planned development permit that allows for modifications to certain zoning requirements for projects that include affordable housing and the granting of density bonuses, incentives and concessions for projects that meet specific requirements in the inclusionary housing section of the Zoning Code. The City will reach out proactively to developers of affordable housing to identify and pursue opportunities on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency.

The City is a member of the San Gabriel Valley Regional Housing Trust (SGVRHT) to leverage resources and increase funding for affordable housing in South Pasadena and the region. One way this will be done is by providing information to developers regarding the SGVRHT and supporting their applications for available funding through those resources.

Eight-year Objective: Expand housing mobility opportunities by encouraging construction of affordable units in higher-income residential areas, as well as on sites with developer interest including higher density residential, mixed-use sites within the Downtown Specific Plan and other mixed-use areas, and non-residential sites with redevelopment potential on underutilized commercial properties. Accomplish this by facilitating expedited review of development proposals that include affordable housing and continuing to provide Zoning Code information to developers of affordable housing regarding special permit provisions and the potential for the granting of density bonuses and incentives and/or concessions to qualifying affordable housing projects. Continue to provide information on State and federal financial assistance programs to developers of affordable housing projects and assistance to applicants of affordable housing projects during the preparation, submittal, and processing of applications to the City for discretionary or ministerial permit approvals. The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Update materials by June 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually.

Program 2.b – Affordable Housing Production

The City will establish a Housing Division within the Community Development Department to manage and facilitate 100% affordable housing opportunities, using in-lieu fees and other available funding, and to monitor the City's inventory of affordable housing as it grows. The City will also continue to work with SGVRHT, connecting affordable housing developers to regional opportunities through its outreach efforts on an annual basis.

Eight-year Objective: Fund and build 400 affordable units, at least 200 on sites with the highest access to resource areas within the City, such as near commercial corridors along Mission Street and Fair Oaks Avenue, and 200 affordable units on residentially zoned sites in higher-income neighborhoods to facilitate housing mobility in mixed-income neighborhoods, and limit potential for concentrating affordable housing in areas identified with higher rates of renter households and incidence of poverty.

Funding Source: Inclusionary in-lieu fees; General Fund; grant funding

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Participation in SGVRHT is ongoing; establish a Housing Division in FY 2022-23; Outreach to affordable housing developers annually.

Program 2.c - CalHome Program

This program is a State Housing and Community Development program providing funds for home ownership programs to assist low- and very low-income households become or remain homeowners, to reduce displacement risk for current owners and expand housing mobility options for prospective homeowners. The program is administered for the City by the City's contracted housing rights and tenant protection agency.

Eight-year Objective: Provide information to low- and very low-income households for funding within the timetables established by the California Department of Housing and Community Development (HCD) funding when funding is made available to the City. The City's objective is to provide information to households in the areas with higher rates of homeowner overpayment and poverty and neighborhoods with a high proportion of renter households to facilitate housing mobility for a minimum of 50 low-income and 50 very low-income households to receive assistance during the 2021-2029 planning period. The status of availability of funding will be posted on the City's website and updated as funding becomes available.

Funding Source: CalHome

Responsible Agency: State of California/City Manager's Office; City's contracted housing rights and tenant protection agency

Timeframe: Ongoing as NOFAs are released for CalHome; City's contracted housing rights and tenant protection agency will conduct outreach at least once a year.

Program 2.d - Section 8 Housing Choice Voucher Program for Rental Assistance

The Los Angeles County Development Authority administers the Section 8 Housing Choice Voucher (HCV) Program, which subsidizes eligible participants to find their own housing on the private market. HCV provides housing subsidy payments to households at or below 50 percent of the median income for two or more persons living together, seniors, and disabled persons. The City maintains information about this program on its website, including a link to the County's webpage for this program.

Eight-year Objective: Continue to assist eligible South Pasadena renters with housing subsidy payments through the HCV program by assisting their access to the LA County Development Authority. Contract with a housing rights and tenant protection agency to provide a biannual educational workshop, beginning in 2023, for rental property landlords, property managers, and other rental housing providers on the benefits of making their units available to HCV holders. Prioritize outreach efforts to property owners and landlords with multifamily and single family rental units in higher-income residential neighborhoods to reduce existing concentrations of HCV renter households in the Fremont Avenue/Huntington Avenue/Meridian Avenue and Mission Street neighborhoods and maximize housing mobility opportunities in higher income neighborhoods, with the objective of at least 40 housing providers committing to pricing one or more of their units to be eligible to accept HCV holders.

Funding Source: HUD

Responsible Agency: Los Angeles County Development Authority

Timeframe: Ongoing

Program 2.e – Facilitate Density Bonus for Projects with On-site Affordable Housing

The City requires provision of inclusionary housing units for most multi-family developments. Projects complying with the ordinance by including on-site affordable units may also take advantage of State-mandated density bonuses and other incentives offered in SPMC Division 36.375 that support project feasibility. The Municipal Code complies with State requirements and encourages density bonuses in conjunction with the inclusionary housing requirement. The City will update the Zoning Code provisions for density bonuses (SPMC Division 36.370) as needed to comply with changes in state law.

Eight-year Objective: Approve housing/mixed-use projects that include density bonuses along with on-site affordable housing units to support maximum unit capacity for RHNA implementation. The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend SPMC 36.370 by July 2023; Implement Inclusionary Housing Ordinance: Ongoing.

Program 2.f - Offer Services to People without Housing

The City will continue its participation in the regional mobile outreach program administered by San Gabriel Valley Council of Governments (SGVCOG). As part of this program, an outreach team spends three hours per week in South Pasadena to provide referrals and support to unhoused individuals. In addition, the South Pasadena Police Department will continue to perform its own outreach to unhoused individuals in South Pasadena, referring them to 211 for resources and services and providing its remaining emergency motel vouchers that were purchased with the City's formerly allocated Measure H funds.

SGV CARE

The City of South Pasadena is participating in San Gabriel Valley Crisis Assistance Response and Engagement Program (SGV CARE) with Arcadia and San Marino. Launched in August 2022 by the SGVCOG and Los Angeles Centers for Alcohol and Drug Abuse (L.A. CADA), SGV CARE is the first multi-city regional effort to provide alternative mobile responses to 9-1-1 calls for people experiencing mental or behavioral health emergencies, including those who are unhoused. The SGV CARE response team is composed of a Licensed Clinical Social Worker, an Emergency Medical Technician, and a Substance Use Disorder Counselor, and it commits to a 30-minute maximum response time to non-violent, non-medical emergency service calls with a focus on serving a variety of needs related to mental and behavioral health and/or homelessness. The pilot phase of this program, also known as the Homeless, Mental Health and Crisis Response Pilot Program, entails a co-response with law enforcement and expires May 31, 2023.

SGV CARE's approach alleviates the burden on law enforcement, while ensuring that communities members experiencing a mental or behavioral health crisis and/or homelessness receive safe and

effective crisis intervention and de-escalation services; emotional support and counseling; mental health assessments; safety planning with referrals to local resources; and, if needed, transportation to a treatment facility or service provider. In SGV CARE's first quarter of operation, the average response was 10 minutes, and 64% of those served were unhoused individuals.

Recognizing that crises do not end after a response call, a critical component of SGV CARE is following up with each client and connecting them to more appropriate on-going services, including those provided by the Los Angeles Homeless Services Authority (LAHSA), Union Station Homeless Services (USHS), the Los Angeles County Department of Health Services (DHS), the Los Angeles County Department of Mental Health (DMH), and other local organizations and entities that are critical participants in the homeless services system. L.A. CADA is already an active participant in the County's coordinated entry system (CES), and the County's mental health and substance use disorder (SUD) systems, so it is well-positioned to maximize these linkages. The City has already hosted several convenings of homeless services providers and other stakeholders to help build engagement and connections between the mobile response program. It is expected that this coordination will continue as the program roll-out advances.

With the technical assistance of the Harvard Kennedy School Government Performance Lab, staff from SGV CARE cohort cities, SGVCOG, and L.A. CADA have been collecting and evaluating data and participating in regular implementation meetings to develop key performance metrics and improve the continued operation of SGV CARE beyond May 2023. The pilot program is fully funded by the Los Angeles County Board of Supervisors' Measure H funds, and the permanent SGV CARE program has thus far secured $850,000 in funding from State Senator Portatino's office and $1.5 million in federal funding.

SVG CARE is an integral part of the City's adopted 2021-2026 Strategic Plan and commitment to affordable housing and helping persons of all income levels with housing options. The 2021-2026 Strategic Plan approved by Council on May 18, 2022 includes six key goals, including Goal 5: Plan for Affordable Housing to Comply with State Mandates and Respond to Community Needs. Additionally, item 5e, Homeless Initiatives, identifies several tasks including the City to continue working with the SGVCOG on region-wide solutions; participate in mental health/crisis intervention program (mobile crisis response program); and expand working relationships with community partners such as Union Station Homeless Services to help the unhoused.

Eight-year Objective: Assist the Police Department to refer individuals without housing to emergency shelters as appropriate and continue to evaluate the possibility of entering into participation agreements with other cities or entities that provide emergency shelter programs.

Funding Source: General Fund and grants

Responsible Agency: Police Department, Community Development Department

Timeframe: Coordinate a meeting with neighboring jurisdictions by December 2023 to identify strategies and translate materials on homeless services to Spanish by March 2024.

SGV CARE pilot program was launched in July 2022 with limited hours in the three cohort cities, and a co-response with law enforcement. Permanent SGV CARE program to begin June 2023.

Program 2.g – Expand Senior Housing

Encourage development of housing opportunities for seniors to accommodate a variety of independence levels and provide safe, comfortable living conditions. Explore opportunities to allow seniors wishing to downsize to remain in South Pasadena with access to services, transportation and community resources.

Eight-year Objective: Develop more senior housing types, aiming for at least 50 units, both market-rate and affordable, in accessible locations that offer choices to aging South Pasadena residents to reduce displacement and enable them to remain in their community.

Funding Source: General Fund, grants, and developer public funding sources

Responsible Agency: Community Development Department

Timeframe: Ongoing

Program 2.h – Incentivize Special Needs Housing

City staff will work with housing providers to ensure that special housing needs and the needs of lower-income households are addressed for persons with disabilities and developmental disabilities, seniors, large families, single parent-headed households with children, and extremely low-income households. The City will reach out to developers of special needs housing to identify opportunities to support them to pursue housing projects in the city. The City will seek to support special housing needs through a combination of regulatory incentives, zoning standards and supportive services programs. This will include implementation of the City's existing reasonable accommodation ordinance to facilitate applications for modifications or exceptions to the rules, standards, and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to the housing of their choice. Implementation will include staff training and informational materials for these programs, including forms that can be easily accessed and submitted at City Hall and on the City's website. In addition, as appropriate, the City will assist and/or provide support for funding applications under state and federal programs designated specifically for special-needs groups. In addition, the City will amend the Zoning Code to comply with the Employee Housing Act, specifically Health and Safety Code Section 17021.5 that requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. The City will specifically define this type of employee housing in the zoning code and permit it in all zoning districts that allow single-family residences.

Eight-year Objective: Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties.

Funding Source: Federal Housing Opportunities for Persons with AIDS, California Child Care Facility Financing Program, State No Place Like Home Funds (administered by LACDA), and other State and federal programs designated specifically for special-needs groups

Responsible Agency: Community Development Department, City Council

Timeframe: Prepare reasonable accommodation procedure handout and application form and post on website by December 2023; Train staff to process reasonable accommodations by December 2023; Seek funding opportunities beginning in 2023 and annually thereafter; all implementation action components are ongoing. Amend the Zoning Code to comply with the Employee Housing Act within 120 days after the adoption of the Housing Element.

Program 2.i – Inclusionary Housing Regulations – Monitor for Effectiveness

To ensure that affordable housing is included in all mixed-use and residential districts throughout the city that permit multifamily housing, the City adopted an Inclusionary Housing ordinance that added inclusionary requirements to the zoning code (SPMC 36.375) in May 2021. Due to economic conditions, the Council has directed an amendment to revise the requirement (See Program 2m). The requirements emphasize developing on-site inclusionary units as part of all projects with three or more residential units. The City will encourage projects that meet this threshold to locate within higher-income neighborhoods and neighborhoods with lower proportions of rental households to facilitate income integration and housing mobility opportunities for lower-income and renter households, and reduce further concentration of affordable units in identified areas of lower-incomes, higher diversity index scores, and larger proportions of renter households. Smaller projects and all ownership projects may opt to pay an in-lieu fee as an alternative. SPMC 36.375 encourages and streamlines use of the State Density Bonus through incentives to comply with objective design standards.

On an annual basis, in conjunction with the State Annual Progress Report (APR) process, the City will report to Council on the number of units approved and built that provide affordable units. Additionally, the City shall review the effectiveness of the Inclusionary Housing regulations and if revisions are deemed necessary, they will be made when such needs are identified. The review will include consultation with the local development community and shall utilize constraints on development as criteria, including housing costs and timing, and will ensure revisions do not act as a constraint on development.

Eight-year Objective: Produce affordable units as part of residential and mixed-use projects with three or more market-rate residential units.

Funding Source: General Fund (Code development); developer obligation (implementation)

Responsible Agency: Community Development Department

Timeframe: No later than June 30, 2025, review effectiveness of the Inclusionary Housing ordinance at producing affordable housing units and its impacts on the viability of housing production. Make adjustments as necessary to the Inclusionary Housing Ordinance based on the review findings no later than December 31, 2025.

~~***Program 2.j – General Plan Affordable Housing Overlay***~~

~~The City will create and map an Affordable Housing Overlay on the General Plan Land Use Map to be applied to selected sites, outside of the Downtown and Mixed-Use districts, particularly in higher-income areas with lower proportions of renter households and sites with access to transit, commercial, services, higher performing educational facilities and amenities. The overlay will allow up to 30~~

~~dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.~~

~~**Eight-year Objective:** Develop at least 400 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risks for lower-income households due to housing shortages and provide housing mobility and income integration opportunities to high resourced areas.~~

~~**Funding Source:** General Fund (for staff resources)~~

~~**Responsible Agency:** Community Development Department~~

~~**Timeframe:** Adopt overlay at the time of General Plan adoption, anticipated concurrent with adoption of the Housing Element.~~

~~***Program 2.k – Affordable Housing Overlay Zone***~~

~~The City will create an Affordable Housing Overlay in the zoning regulations to be applied to selected sites outside of the Downtown and Mixed Use districts, particularly in higher income areas with lower proportions of renter households and sites with access to transit, commercial, services, higher performing educational facilities and amenities. The overlay will allow up to 30 dwelling units per acre for projects that include deed-restricted affordable units. Program 3.a also addresses the sites where the overlay will be applied including the specific state law requirements for the rezoning of the sites.~~

~~**Eight-year Objective:** Facilitate develop at least 400 units of affordable housing during the planning period on sites where the Affordable Housing Overlay is applied to reduce displacement risk for lower-income households due to housing shortages and provide housing mobility and income-integration opportunities to high resourced areas.~~

~~**Funding Source:** General Fund~~

~~**Responsible Agency:** Community Development Department~~

~~**Timeframe:** Amend zoning to include overlay by October 15, 2024.~~

Program 2.l – Facilitate Affordable Housing on City-Owned Property.

The City will utilize identified City-owned sites to develop 100% affordable housing projects (either residential or possibly mixed-use) that include extremely-low, very low, and lower income households. The City will sell such parcels to developers building affordable housing or otherwise ensure the development of housing on such sites. This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023. The process will include outreach to create partnerships with affordable housing developers that can maximize the opportunities and number of units. This process will be undertaken by December 2023. Once an inventory and list of qualified developers is complete, the City will initiate the Surplus Lands Act (SLA) process to pursue affordable housing projects in the city. The City will require an affordability covenant recorded against the land stipulating a specified percent of the total units developed will be affordable to lower-income households, in accordance with State law. The City will comply with State law to implement the SLA process as follows:

- The City will declare land "surplus" in accordance with the definition listed in Government Code, Section 54221, subdivision (b)(1).

- The City will prepare and issue a Notice of Availability (NOA) to the required parties and provide 60 days to receive responses from interested parties.

- The City will negotiate in good faith with any respondents for at least 90 days, prioritizing affordable housing uses in the order provided in Government Code section 54227.

- The City will send the proposed disposition to the State for review.

- The City will address any State findings, as needed.

- Upon final State approval, the City will execute a sale or lease of the land and record an affordability covenant.

The first RFP will be issued by March 31,2024, in order to begin construction within two years and complete within the housing element cycle period. Three other RFPs on three additional inventory sites will be issued by 2026, with the goal of the City disposing of all identified and applicable surplus sites. Projects under this program will be expedited in compliance with the SB 35 streamlined ministerial process and developers will be encouraged to utilize the inclusionary housing ordinance's streamlined architectural incentives, as applicable.

The City-owned or partially City-owned sites listed in Appendix A and Table VI-50 subject to this program are listed below in addition to the sites discussed in the next paragraph:

- Site 8: Public works yard site
- Site 13: City-Owned Parking Lot site (City owns three of the four parcels)

There are no existing uses on these sites that impede additional development and there are no known conditions that preclude development in the planning period. The City is already coordinating with the owner of the other parcel on Site 13. Site 8 is completely City-owned and would not require coordination with any other owners. In addition, the City owns one of the parcels in Site 12 in Table VI-50 and will coordinate with the owner of the other parcel on Site 12 to encourage development of housing on that site.

Additionally, the City will commit to monitoring the continued progress of developing the city-owned sites every other year and will identify alternative sites within 6 months if necessary if sites will not be developed during the planning period.

Eight-year Objective: Sale of all City-owned surplus properties identified appropriate for housing**.** Issuance of RFPs on four projects and issuance of building permits for at least two projects, for a total of at least 40 ELI, VLI and LI units, 18 moderate income units, and 11 above moderate income units.

Funding Source: General Fund for staff resources to administer program; City-owned land; affordable housing developer partners to use multiple funding sources including eligibility for City's affordable housing trust fund and City support for SGVHT applications.

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Create City-owned affordable housing site property list by June 30, 2023. Start outreach to developers by December 2023. Issue first RFP by 2024 and remaining three RFPs in 2026. Building Permit issuance for first project by 2025; two additional building permits issued by 2029.

Bi-annually, review progress towards developing city-owned sites and identify alternative sites within 6 months if sites will not be developed within the planning period.

Program 2.m – Update Inclusionary Housing Regulations.

In order to broaden the feasibility for projects to include on-site inclusionary housing, the City will revise the Zoning Ordinance to reduce the required percentage of inclusionary units from 20% of base units to 15% of base units. Additionally, an exemption to the Ordinance will be added for projects with less than 10 units. Other provisions of the ordinance will also be reviewed, in consultation with the local development community, in the revision process including but not limited to in-lieu fees, cost of a comparable unit and how the inclusionary regulations relate to state density bonus law and other City development standards.

As part of Program 2.i., the effectiveness of the Inclusionary Housing Ordinance will be reviewed in 2025 and additional changes will be made to the Ordinance if it is determined that it is an impediment to housing development.

Eight-year Objective: Approve 137 inclusionary units during the planning period (15% inclusionary requirements on the moderate- and above moderate RHNA allocation of 912 units).

Funding Source: General Fund

Responsible Agency: Community Development Department and City Council

Timeframe: Adopt updates to the Inclusionary Housing Ordinance within 120 days of Housing Element adoption.

Program 2.n – Citywide Height Limit Ballot Initiative

Consistent with requirements under state law concerning cities placing measures on the ballot, the City will seek through voter approval in a local election, the repeal of the current height limit of 45 feet as to at least any residential or mixed-use (including residential) project on which the housing element anticipates a base density in excess of 50 units/acre. Such measure will be brought to the City Council for consideration prior to being placed on the ballot. The measure may either eliminate the height limit for these parcels entirely, or be replaced by a new height limit. ~~If the height limit is replaced, the new limit will be no less than 84 feet to achieve the densities identified in the DTSP.~~ In addition, the City will facilitate residential projects that may exceed 45 feet by utilizing the existing options for exceptions to the citywide height limit, including state Density Bonus law. (See also Program 3.n.) If the ballot measure is approved, the City will update development standards throughout the DTSP and zoning code to allow for buildings that can achieve the densities identified in the Housing Element. ~~If the ballot measure is not approved by the voters, the City will complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre; City will conduct additional rezoning to address the remaining RHNA on sites allowing densities greater than 50 dwelling units per acre. This will include preparing a mid-cycle Housing Element.~~

Eight-year Objective: Facilitate proposed densities on residential sites in the Housing Element where the height limit may be an impediment to development.

Funding Source: General Fund

Responsible Agency: Community Development Department and City Council

Timeframe: Place measure on ballot by December 31, 2024. Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code. If the ballot measure is not approved by the voters, within 9 months thereafter complete a mid-cycle revision to the housing element, reducing sites for which the housing element anticipates a base density in excess of 50 units/acre. **The 60 foot and 75 foot height limits shall be adopted by the end of the first quarter of 2027.**

2025 Update: The Council opted to place a measure on the ballot (Measure SP) that repealed height limits, allowing Council to establish height limits as appropriate to accommodate the densities in the housing element. Measure SP was approved by the voters on November 5, 2024. Measure SP did not propose a specific height limit, and instead allows the City Council to establish heights in zones other than single family zones.

2026 Update: To provide the flexibility needed to achieve the densities listed in this Housing Element, the City will adopt the following height limits:

- **60 feet for the DTSP-MUC-70, HO, and MU zones (all of which have a maximum density of 70 du/ac)**
- **75 feet for the DTSP-FOC zone (all of which have a maximum density of 90 du/ac)**

GOAL 3.0 Provide opportunities to increase housing production

Provide adequate sites for residential development with appropriate land use designations and zoning provisions, objective design standards, and energy efficiency requirements, and ensure efficient and transparent review processes for residential development, including accessory dwelling units, to accommodate the City's share of the regional housing needs.

Policy 3.1 Promote mixed-use developments by continuing to allow development of residential uses in the Mixed-Use zoning district and the Downtown Specific Plan zoning districts and encourage on-site inclusionary housing units within the residential component of all residential and mixed-use projects and planned development permits, as required by the City's Zoning Code. Conduct early consultations with developers of all residential and mixed-use projects to explain the requirements and design incentives.

Policy 3.2 Maintain an inventory of vacant and underdeveloped properties in the City with potential for development of new residential dwelling units. Improve the City's ability to monitor through introducing electronic permit system and other technology to facilitate research of property data.

Policy 3.3 Encourage the development of housing types that offer options for seniors to remain within the community when remaining in their existing homes is no longer viable.

Policy 3.4: Allow for and encourage new residential and/or mixed-use development in or near commercial districts, with access to services, transit and schools. Allow for employment centers to be located near housing developments to increase job opportunities.

Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption.

Program 3.a – Rezone and Redesignate Sites to Meet RHNA

~~**Redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A will address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended.**~~ As part of ~~**this**~~ **the** rezoning, to improve housing mobility and increase new housing choices and affordability in higher resource or relatively higher income areas, the City will increase the allowable zoning within the Medium Density Residential zone to at least 30 dwelling units per acre (du/ac) and to at least 45 du/ac within the High Density Residential zone. Per California Government Code Section 65583.2(c), the City will also amend the zoning code to allow approval of projects that have at least 15-percent lower-income units in compliance with the inclusionary housing ordinance without discretionary review or "by right." Additional zoning capacity will be achieved through the adoption of the Downtown Specific Plan (DTSP) and the expansion of mixed-use areas along the City's arterial corridors **and on large, underutilized sites** either through inclusion within the DTSP or through a zoning overlay district. Allowable densities withing these mixed-use areas will be **50-**70 du/ac, except for the Fair Oaks zone within the DTSP, which will be ~~**110**~~ **90** du/ac. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. ~~Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program.~~

Eight-year Objective: Rezone sufficient sites to accommodate the City's RHNA targets.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: General Plan amendments and rezoning: will occur within 120 days of adoption of a compliant housing element.

Program 3.b - Mixed-Use Developments and Adaptive Re-Use

As part of the rezoning and adoption of the DTSP done as part of Program 3.a, the City will create development standards that encourage the development of high-density residential uses. It is anticipated that the base density of the DTSP zones will be ~~**either 70 or 110**~~ **between 50 and 90** du/ac, depending on the zone.

Both the Mission Street and Fair Oaks zones in the DTSP will contain the following objective development standards:

- Setbacks: 0 feet along the building frontage and sides, and no more than 15 feet in the rear of the building.
- Floor Area Ratio: FAR will facilitate maximum allowable densities in each DTSP zone.
- Minimum unit size: 450 square feet.
- Required parking:
    - No required parking for parcels within ½ mile of a high quality transit stop;
    - One space per studio or one-bedroom unit;
    - 1.5 spaces per two-bedroom or larger unit;
    - Development incentive of 0.5 spaces for deed restricted affordable housing units.
- Private open space: 50 square feet minimum for Liner and Flex Building typologies.

These development standards will be updated upon repeal or replacement of the existing height limit in accordance with Program 2.n to allow for the construction of buildings that can achieve the densities identified in the Housing Element. . Within 120 days after the enactment of a ballot measure repealing or replacing the height limit, the City will revise the development standards contained in the DTSP and zoning code accordingly.

Additionally, development incentives that would encourage the construction of affordable units within market-rate projects, beyond those required by State Density Bonus law, will be included in the DTSP. These development incentives may include:

- Reduced private open space requirements;
- Reduced public open space requirements;
- Reduced parking requirements;
- Expedited processing.

The City will analyze and consider a fee reduction or waiver at the mid-point review in the event that other efforts to facilitate affordable housing production are inadequate.

Eight-year Objective: Target production of 400 lower-income housing units on properties located within the City's commercial districts through the mixed-use development provisions of the Zoning Code and on vacant and reused properties in the Downtown Specific Plan area. Reduced time to process permits for mixed-use projects that include affordable housing and increased applicant understanding of the streamlined state density bonus, planned development permit and affordable housing incentive provisions of the Zoning Code to maximize the potential for a project to include affordable housing.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt General Plan, Downtown Specific Plan, and other needed zoning changes with objective development and design standards within 120 days of adoption of a compliant Housing Element. See also Program 3.a. Modify City website to include revised process for streamlined

processing of planned development permits for mixed-use and Downtown Specific Plan applications and post notification and educational materials for objective development and design standards by November 2023. Update handout materials by November 2023; Ongoing at the Planning Counter and as applications are received. Outreach to affordable housing developers annually (see Program 2.a.) Analyze and consider a fee reduction or waiver at the mid-point review if necessary.

Program 3.c – Replacement of Lost Units from Residential Demolitions

In accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Non-vacant sites
- Vacant sites with previous residential uses that have been vacated or demolished.

Eight-year Objective: Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.

Program 3.d – Enable Parcel Assemblage

To create additional opportunities for redevelopment and affordable housing, the City will help facilitate lot consolidations to combine small lots (including lots on slopes) into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. The City will support developers/owners who approach the City with interest in lot consolidation for the development of affordable housing by deferring certain fees, allowing more height or additional stories, waiving lot merger fees to enable the project, and providing concurrent/fast tracking of project application reviews. By 2023, the City will review the effectiveness of this program and revise as appropriate. The City will also pursue grant funding for parcel assemblage land banking when it is available.

Eight-year Objective: Approval of more applications to merge parcels that result in feasible sites for multifamily housing during the planning period.

Funding Source: General Fund (legislative efforts); Grant funding (implementation)

Responsible Agency: City Manager's Office; Community Development Department

Timeframe: Meet with developers and property owners starting in 2022 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months and annually thereafter. Ongoing: Support consolidation as applicable housing applications are received; Pursue grant funding as feasible during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.

Program 3.e – Develop an Electronic Permitting System

Introduce an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.

Eight-year Objective: All planning and building permits will be recorded in an electronic permit system with capability to provide data needed to analyze and report housing production including affordable housing units.

Funding Source: General Fund and grants

Responsible Agency: Community Development Department

Timeframe: Contract for EPS system – December 2022; approve and implement a system by September 2023; ongoing maintenance and system updates as needed.

Program 3.f – Allow and Facilitate ADUs

The Zoning Code was amended in May 2021 and again in December 2021 to encourage the construction of accessory dwelling units (ADUs) in all zoning districts that permit residential development based on objective standards and a non-discretionary process, as required by state law, and to establish objective design standards and supporting guidelines to apply to ADUs on historic properties. The City will continue to work with HCD on their review of the City's ADU ordinance. If revisions are found to be necessary, the City will make revisions to bring its ADU ordinance into compliance with State law.

The City provided supporting brochures that explain the process and key provisions of the ADU ordinance and the historic preservation provisions. Application forms are submitted electronically along with plans to improve efficiency. In 2021, City increased its Planning staff specifically to review and process ADU applications more quickly, and there has been an increase in submittals and a decrease in processing time.

As part of this program, the City will perform the following community outreach and education activities to facilitate ADU development by South Pasadena's property owners:

- Allocate staff time to distribution of educational materials in single family residential neighborhoods at public events such as street fairs and farmers' markets;
- Make brochures available at community center and libraries, and at "ADU Community Open House";
- Create short promotional videos or flyers and brochures (digital and print) by January 2024;

- Distribute at least annually though social media promotions, direct mailings to property owners; with a particular emphasis on predominantly single-family neighborhoods and high resources areas; water bill inserts; and the dedicated City webpage (Program 3.k).

This program aims to build on that progress and support property owners interested in building ADUs and JADUs to increase the overall housing stock in residential zones and to promote this housing type as a more affordable housing alternative. During the Housing Element planning period, the ordinance will be updated as appropriate in compliance with state law and adjusted as issues arise and new best practices develop. Some of the features of the program will include:

- Online application process with staff intake for quality control
- Maintain and amend materials for better applicant guidance, as needed
- Provide consistent staff training and support
- Look for all opportunities to provide certainty earlier in the process
- Reduce the number of steps and shorten timeframes, and
- Continue to watch the prefabricated housing market, including companies that produce 3D-printed homes, repurposed shipping containers, and modular construction in order to integrate new ideas into the permitting process as appropriate.

Eight-year Objective: Maintain updated ADU regulations to promote development of an increasing number of ADUs year-over-year; issue permits for all legal ADUs, anticipated to be between 297 and 383 ADUs during the remainder of the 2021-2029 projection period (from January 2022 through October 15, 2029).

Funding Source: General Fund; SCAG grant

Responsible Agency: Community Development Department

Timeframe: Continue to monitor process and improve program to facilitate and encourage ADUs and JADUs on an ongoing basis. The City will revise their ADU ordinance within six months of receipt of the HCD response letter to their ADU ordinance, if updates are needed based on the HCD letter, and update ADU brochures in 2023, and include ADU Amnesty information and incentives. Review the effectiveness of the ADU regulations every two years starting in December 2023, and if needed based on staff review and/or in response to changes to state ADU law.

Program 3.g – Monitor ADU Production

The City will monitor the interest in and production of ADUs on an ongoing basis, providing updates to the California Department of Housing and Community Development (HCD) through annual progress reports and to the public via an annual report to Council. In these reports, the City will summarize the level of interest expressed through the number of initial and approved applications, permits issues, and the number of constructed units (along with occupancy statistics). These reports will also include an evaluation of the effectiveness of ongoing and new ADU-related programs and identify potential changes based on ongoing outreach to property owners and the development community. Beginning in 2023, the City will initiate an annual survey of ADU owners to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Survey data will inform as to whether additional measures might be taken, particularly if programs in other jurisdictions have succeeded in constructing more deed-restricted low-income ADUs. Starting

in January 2024~~5~~6 and every ~~two~~ year~~s~~ thereafter, the City will ascertain whether the rate of ADU construction and the levels of affordability are sufficient to match the projected trendline of 95 ADU building permits between June 30, 2021, and the end of 2023. If the rate of construction and/or affordability is below 90 percent (85 ADUs), the City will revise its programs to further incentivize and fund ADUs (see Program 3.h).

Eight-year Objective: Approve an additional 297 ADUs between January 1, 2022 and October 15, 2029.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess ADU approval progress **and affordability every year starting in 2026** ~~in January 2024, again in January 2026, and again in January 2028~~ and adjust after each of those milestones if ADU numbers are not tracking with projections in Section 6.6.2 (Land Resources). If there is a very large gap between the projections and actual building permits then barriers will be identified and rezoning will be completed as called for in Program 3.h.

Program 3.h – Back-up to Address Shortfall in Anticipated ADUs

The Housing Element is relying on ADUs to satisfy a portion of its RHNA allocation and has set a quantified goal based on the observed rising trend in recent years. As described in Program 3.g, the City will monitor ADU production **annually** starting in January 2024~~5~~6. If the number of ADUs permitted by that time isn't meeting anticipated numbers, the City will take further action to address its RHNA requirements. This may include rezoning additional land to address the gap in the lower-income RHNA between the number of ADUs produced and the number anticipated by the end of 2023. The City will also consider initiating other efforts, including direct funding to subsidize dedicated affordable ADUs or committing to additional outreach and promotion depending on the level of additional ADUs needed and barriers identified, if any, to ADU production during the first two years of the planning period. If rezoning is needed, it will be brought to Council for approval by the end of 2024. If rezoning is needed again after the first four years of the planning period, it will be brought to Council for approval by the end of 2026. **In 2025, action taken to address potential shortfall in ADUs is to develop pre-approved ADU prototypes and a comprehensive program to facilitate the use of the plans. Plans and program kick off are scheduled to occur in 2026.**

Eight-year Objective: Identify sufficient land for rezoning, or other strategies, to accommodate the unmet lower-income RHNA that was projected to be met by ADUs.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Assess barriers including any need for rezoning by the end of 2023 and present to Council for approval by the end of 2024. Determine whether other additional programs including rezoning are needed and implement them by the end of 2024. Assess barriers again by the end of 2025 and address by the end of 2026. **In 2025, action taken to address potential shortfall in ADUs is to develop pre-approved ADU prototypes and a comprehensive program to facilitate the use of the plans. Plans and program kick off are scheduled to occur in 2026.**

Program 3.i – ADU Amnesty Program

To further encourage ADU creation, the City established an ADU amnesty program in July 2021 in compliance with Senate Bill 13 to facilitate the process of bringing existing unpermitted ADUs into compliance with local regulations (including the building code) by owners of this type of unit. Under certain circumstances specified by SB 13 and other provisions, enforcement of violations related to unpermitted ADUs may be delayed for five years if correcting the violations is not necessary to protect health and safety. City staff works closely with applicants to implement this program, providing information and application assistance to help them identify the necessary upgrades to bring the unit up to minimum building code health and safety standards. In addition to improving the records of ADUs in the City, the City's amnesty program will also improve tenant safety by ensuring the units are habitable. A potential further development for the program would be to consider providing some incentives to owners who will commit to deed-restricting their ADU to rent to lower-income households. The City has already advertised the program widely, including providing a brochure in utility bills and ongoing web page information, and Planning staff has begun to receive inquiries from homeowners.

Eight-year Objective: Provide assistance to homeowners to convert 50 identified existing unpermitted accessory dwellings to compliant ADUs, unless infeasible.

Funding Source: General Fund (for staff resources)

Responsible Agency: Community Development Department

Timeframe: Allow legalization of ADUs on an ongoing basis. Monitor annually to determine need for additional outreach. Identify neighborhoods with relatively high proportions of unpermitted ADUs by July 2024 to target outreach. Determine incentives for legalizing ADUs with deed-restricting commitment by January 2024. Update brochures with legalization process information and incentives in concert with ADU Ordinance update timeframe.

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Planning fees for ADUs are already low at $159 for planning review/inspection. The City will consider a program to waive, reduce, or defer connection or impact fees for ADUs that agree to affordability covenants for a set period of time. The City will conduct additional analysis to determine the feasibility and legality of fee reductions for developments that meet affordability requirements and address special needs of the community. Through the annual fee schedule adoption process, the City Council will make appropriate recommendations for fee updates.

Eight-year Objective: Evaluate fee waivers as part of an economic study for developing an affordable housing program and act upon recommendations, as appropriate.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Develop affordability covenant program by July 1, 2023.

Program 3.k – ADU Education, Promotion and Homeowner Outreach

A recent study from the University of California (UC) Berkeley Turner Center for Housing Innovation noted that education and information are crucial to the success of ADU creation.[1] The City will encourage and publicize the accessory dwelling unit program on the City's website to increase public awareness. The City has developed a brochure based on the revised ADU ordinance that answers frequently asked questions (FAQs) and outlines the steps in the application process. A Virtual Planning Desk webpage launched in 2021 concentrates all support materials and an application form that guides applicants toward Code compliance in their proposals. Design guidelines and a second brochure focused on building ADUs on historic properties will be posted on the Virtual Planning Desk. The City will create a list of resources for interested homeowners, including contacts for designers, architects, builders, lenders, etc.

The City will also make the following efforts to promote ADU development:

- Research and coordinate with non-profit organizations, builders, and banks regarding funding/assisting with construction costs and inform ADU owners and renters of such information. This will include encouraging financial institutions to appoint an "ADU Ambassador" who will be the local representative within the financial institution. The City would provide training and educational materials to the ambassadors. The City will maintain a list of ADU Ambassadors and distribute the list to interested homeowners seeking information about finding loans for ADU development.
- Expand educational efforts to include active property owner outreach. Marketing and promotional materials will be prepared to inform eligible homeowners of new ADU programs as they are adopted and launched. The City will work to identify the types of homeowners most likely to be interested in building an ADU and reach out to them directly.
- Reach out to local homeowners that have added an ADU to involve them in supporting other homeowners who are considering adding an ADU to their property. Hold a community "ADU Open House" to share ideas and inspire homeowners to build ADUs.
- Create short promotional videos and flyers and brochures (digital and print). Distribute though social media promotions, direct mailings to property owners, water bill inserts, and the dedicated City webpage.
- Establish an ADU point person at the City to serve as a central point of information and a resource for enhancing awareness.

Eight-year Objective: Facilitate the development process of 297 ADUs through promotion of City programs and connecting ADU owners to resources to encourage increased housing opportunities in high resource areas.

Funding Source: General Fund, grant funding

Responsible Agency: Community Development Department

Timeframe: Created historic property guidelines and brochure. Built up the Virtual Planning Desk with complete ADU information, including examples of ADUs on webpage. Develop list of resources,

[1] Chapple, Garcia, et al. *Reaching California's ADU Potential: Progress to Date and the Need for ADU Finance*, 18.

and coordinate with ADU development and financing community and directly reach out to potential owners by 2023.

Program 3.l – Increase and Maintain Planning and Housing Staff Resources

The Community Development Department will hire three additional staff members to increase the Planning Division's ability to facilitate processing of housing applications, in particular to process ADUs and applications that include affordable housing. Additionally, a dedicated housing division will be added to the department to focus on implementing the goals and programs of the housing element. These additional staff will allow the City to implement programs to incentivize and promote housing development.

Eight-year Objective: Augment and support staff resources to expedite housing projects and implement housing programs.

Funding Source: General Fund

Responsible Agency: Community Development Department, City Council

Timeframe: The Housing Division was included in the 2022-2023 budget and new staff was hired by November 2022. Planning unit is operating with 5 FTE and recruiting for one additional person.

Program 3.m – Implement SB 9 and SB 10

The City intends to promote the housing mobility opportunities and increase the supply of affordable units in neighborhoods with higher incomes and resources. This will include the development of streamlined processes for SB9 and an SB10 implementation program with pre-approved building typologies.

Specifically, the City will create a "Missing Middle" housing program. This program will establish objective design standards for certain housing types in low density residential zones within high-quality transit areas as defined by the Southern California Association of Governments (SCAG), except where the boundary may overlap with designated high fire hazard areas. Missing Middle housing types contemplated for this program will include duplexes, triplexes, four-plexes, and cottage courts.

The baseline density for this program will be 15 du/acre in the RE and RS zones. Staff shall present a specific proposal to the City Council for consideration and adoption, including a finding that the ordinance is consistent with the City's obligation to affirmatively further fair housing. The missing middle housing program proposal will include:

- Zoning Code Text Amendment to establish a Missing Middle housing program.
- Appropriate development standards to facilitate program density including but not limited to: identifying lot size requirements, reducing setbacks, increasing FAR and evaluating minimum unit size requirements.
- A simple waiver system to ensure development standards do not preclude the density of 15 du/acre.
- An exhibit or definition to clearly demarcate the area that is subject to the ordinance.

By December 2027, the City will analyze whether it is on track to meet the eight-year objective for the Missing Middle housing program. If, at that point, the City is not on track to meet the eight-year objective, it will increase the allowable maximum density for this program.

Eight-year Objective: Facilitate the development of at least 50 units with the SB10 Missing Middle housing program over the reporting period.

Funding Source: General Fund; SCAG REAP 2.0 Grant

Responsible Agency: Community Development Department

Timeframe: The City will work with a technical consultant to develop objective design standards or building typologies related to this program and prepare and present the necessary implementation policy and zoning amendments to effectuate the program within 24 months of the adoption of the Housing Element.

By December 2027, analyze Missing Middle housing program and make modifications as necessary.

Program 3.n – Zoning Changes

This program will be achieved through inclusion of new or revised development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review. In addition, comparable Zoning Code revisions outside of the DTSP area will further implement this program. The types of standards and processes that will be revised to reduce the constraints on development including, but not limited to, height limits, open space standards, and parking requirements. Additionally, subjective approval findings will be removed in compliance with State law to facilitate administrative approval of residential developments.

Eight-year Objective: Update zoning to facilitate the needed housing units.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: General Plan amendments and rezoning will occur within 120 days after adoption of a compliant Housing Element.

Program 3.o – No Net Loss

The City will evaluate the sites inventory identifying the zoning, size, and number of vacant and underutilized parcels suitable for residential development for each income category. If the sites inventory indicates a shortage of available sites to accommodate the remaining RHNA for an income category, the City shall rezone sufficient sites with appropriate densities to accommodate its remaining RHNA for each income category.

Additionally, by October 2028, the City will evaluate the progress towards realizing entitled and pending units listed in Table VI-44. The City will identify how many entitled and pending units have initiated construction, or have building permits and are preparing to initiate construction. If the number of units trails the assumptions for entitled and pipeline units in Table VI-44, the City will review entitled and pending projects which are not on the pathway

to construction, and identify barriers that might be blocking the development of housing, such as maximum densities, development standards, or permitting processes, making at least one change to one of these regulatory categories by one year later.

Eight-year Objective: **Monitor progress of entitled and pending units being realized. If entitled and pending units are not making progress, the City will identify barriers and make at least one regulatory change.**

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: No later than December 31, 2024 and December 31, 2026, the City shall evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites. By the end of 202, **the City will evaluate the progress towards realizing entitled and pending units. For the entitled and pending units which have not seen progress, the City will identify barriers that might be blocking the development of housing, and make at least one regulatory change by one year later.**

GOAL 4.0 Compliance with State Housing Laws

Adopt and implement policies and regulations that comply with State laws to facilitate housing for people living with disabilities or experiencing homelessness, and to accelerate the approval processes for housing projects, particularly projects that include affordable housing units.

Policy 4.1 Educate City staff, property owners, and homebuilders about ADA accessibility and universal design principles. Encourage and/or incentivize the creation of homes with universal design features.

Policy 4.2 Require new medium- to large-scale residential and mixed-use projects to meet ADA accessibility standards and provide a sufficient number of ADA-accessible and/or ADA-ready units.

Policy 4.3 Establish transparent procedures for requesting reasonable accommodations, on a case-by-case basis to promote equal access to housing for disabled persons.

Policy 4.4 Include low-barrier navigation centers as a form of transitional and supportive housing allowed in residential zoning districts.

Policy 4.5 Review and revise the Zoning Code regulations for allowing emergency shelters to maintain compliance with State laws for such uses.

Program 4.a – Land Use Controls – Emergency Shelters

In accordance with State law, the City allows emergency shelter without discretionary review in the BP zone. The City will amend the Zoning Code to update standards for emergency shelters in Section 36.350.250 for consistency with Government Code Section 65583(a)(4))

Eight-year Objective: The City will adopt an amendment to the Zoning Code to revise the operational standards for compliance with state law in regard to parking and distance between shelters and to establish a higher, economically feasible maximum number of beds permitted in any one emergency shelter and accommodate the increased homeless population documented in the 2022 Point in Time count.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Adopt zoning amendments within one year of Housing Element adoption.

Program 4.b – Land Use Controls – Transitional and Supportive Housing/Low-Barrier Navigation Centers

In accordance with State law (SB 2 - 2007) Zoning Code regulations must consider transitional and supportive housing as a residential use in any zone where residential uses are allowed and subject to the same development regulations as other residential uses in the same zone. In addition, per newer State law (AB 2162 [2018]), the City's Zoning Code will be reviewed and amended if needed to permit the development of supportive housing by-right in areas zoned for either multifamily or mixed-use development. The City has amended the Zoning Code to partially address SB 2 regarding transitional and supportive housing. This program requires additional amendments to the Zoning Code to fully address SB 2 regarding how transitional housing is allowed and if needed, to address AB 2162 for supportive housing.

Low-barrier navigation centers fall into the transitional and supportive housing classification but the term has not been incorporated explicitly by reference into the SPMC. The use is not currently permitted in commercial (mixed-use) zones. In accordance with AB 101, the City will amend the Zoning Code to define and specifically reference low-barrier navigation centers as permitted without discretionary review in areas zoned for mixed use and nonresidential zones permitting multifamily uses.

Eight-year Objective: The City will adopt an amendment to the Zoning Code for consistency with SB 2 and AB 2162. Revise the Zoning Code to define and specifically reference low-barrier navigation centers as a permitted use in residential and mixed-use districts.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete amendments to Zoning Code within 120 days after adoption of the Housing Element.

Program 4.c – Land Use Controls – Flexible Zoning Regulations

The City's Zoning Code provides for flexibility in the application of development regulations pertaining to affordable multifamily housing developments and senior citizens' projects through the use of the planned development permit process. The planned development permit is intended to facilitate development of affordable housing in mixed-use and residentially zoned areas by permitting greater flexibility in the design of projects than generally is possible under conventional zoning or subdivision regulations.

Eight-year Objective: The City will continue the application of flexible zoning regulations to promote the development of affordable housing through the planned development permit process, as provided for in the Zoning Code.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Ongoing as applications are received.

Program 4.d – ADA Accessibility Standards

Revise the zoning code to specify ADA requirements for new construction of a certain size and establish a minimum proportion of units that are ADA accessible upon building occupancy.

Eight-year Objective: Facilitate expanded housing mobility for persons with disabilities by ensuring that new mixed-use and medium- to large-scale residential projects are ADA compliant and provide an adequate number of units that allow for disabled access, with all new buildings of more than six units being ADA compliant and no less than 10 percent of new units being immediately accessible to disabled individuals for a minimum of 207 accessible units over the 2021 – 2029 planning period.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Amend zoning by 2024.

Program 4.e – Universal Design

Exceed the accessibility requirements of the ADA and California Title 24 Disabled Access Regulations by encouraging new construction and rehabilitation to incorporate the use of technologies and design features that create universal accessibility. Provide homebuilders and property managers with information and resources related to universal design principles. Identify suitable universal accessibility standards for multifamily housing projects and develop incentives to encourage construction of a variety of housing types suitable for people with disabilities, including residents with developmental disabilities and housing suitable for larger households with a disabled member in areas with access to transit, commercial services, and amenities to improve mobility opportunities.

Eight-year Objective: Maximize, to the extent feasible, the number of new or rehabilitated homes that incorporate universal design principles that make units accessible to/adaptable for those with disabilities, with a goal of 30 percent of new homes incorporating universal design. Within the

Downtown Specific Plan and mixed-use zones, target development of 300 new homes incorporating universal design.

Responsible Agency: Community Development Department

Funding Source: General fund, grants

Timeframe: Three years for development of zoning standards and incentives with completion by July 2025; ongoing application and enforcement of accessibility requirements; ongoing education efforts and information added to ADA requirements on City website.

Program 4.f – Senate Bill 35 Procedure or Policy

Establish a written policy or procedure and other guidance as appropriate to specify the SB 35 (2017) streamlining approval process and standards for eligible projects, as set forth under Government Code Section 65913.4.

Eight-year Objective: Streamline housing projects as required by SB 35.

Funding Source: General Fund

Responsible Agency: Community Development Department

Timeframe: Complete by June 2024.

GOAL 5.0 Promote fair housing while acknowledging the consequences of past discriminatory housing practices

Acknowledging that throughout much of the 20th century, discriminatory housing and lending practices excluded non-white people from purchasing housing in the city, and that such history continues to have implications for the community's racial and cultural diversity today. Promote fair housing through policies and programs to promote inclusion of low-and moderate-income households.

Policy 5.1 Provide information on fair housing practices and resources at City Hall or on the City's website.

Policy 5.2 Coordinate with the City's contracted housing rights and tenant protection agency to provide referral and mediation services for tenants and property managers. Educate and assist landlords, housing managers, real estate professionals and tenants regarding fair housing issues and laws. Provide public information regarding the City's contracted housing rights and tenant protection agency at City Hall. Take measures to quickly and fairly resolve fair housing complaints or conflicts as they are reported.

Policy 5.3 Comply with all applicable federal, State, and local Fair Housing and anti-discrimination laws and regulations that make it illegal to discriminate with respect to housing against any person because of race, color, national origin, ancestry, religion, disability, familial status, marital status, gender or gender expression, sexual orientation, source of income, or age. This includes in the rental or sale, financing, advertising, appraisal, and/or provision of housing and associated real estate and financial services, as well as land-use practices.

Policy 5.4 Proactively encourage community members to learn more about the social impacts of housing discrimination and take actions as a community to actively welcome and embrace all members of the community to live, work and play in South Pasadena.

Policy 5.5: In conjunction with the inclusionary housing ordinance, allow and encourage rental and deed-restricted affordable housing units across a wide geographic area of the City.

Policy 5.6: Allow and encourage a variety of residential types and living arrangements, including expanding housing opportunities pursuant to SB 9, which allows duplex development on single-family parcels, with some specific exemptions. The combination of new and existing homes in South Pasadena should offer a variety of unit sizes, configurations, and contexts, including, but not limited to, single-family homes, efficiency apartments, multi-bedroom apartments, fourplexes, cooperative housing, group living, etc.

Program 5.a - Fair Housing Education, Outreach, and Services

Provide fair housing education, outreach, mediation, and referral services through the Housing Division and a contracted fair housing and landlord-tenant legal organization and make information and services available in English, Spanish, Mandarin, Cantonese, and/or other languages as appropriate. Educational materials/services may include webpages and FAQs, brochures, videos, seminars/webinars, and/or one-on-one counseling, among others. Distribute informational materials to community organizations and neighborhood gathering spots in areas with higher rates of protected groups, particularly in the South Pasadena Southwest neighborhoods with higher rates of disabled persons; the South Pasadena North/Garfield Park areas with a higher proportion of seniors with disabilities and renter populations; and the South Pasadena Southeast neighborhoods with higher rates of poverty, renter households and lower incomes. The City may consider partnering with local community-based organizations, real estate interests, and/or schools to disseminate relevant information.

Eight-year Objective: Reduce the annual average of fair housing complaints in the next eight years as compared with the period between 2015 and 2022 by providing assistance or referrals to 40 residents, or as needed; respond to or forward all fair housing complaints within five business days of receipt; and work with partner agencies to achieve resolution within three months for all fair housing complaints received by City staff. Meet annually with the City's contracted housing rights and tenant protection agency staff, beginning in 2023, to assess patterns of fair housing issues and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Funding Source: General fund, State, and federal funds

Responsible Agency: Community Development Department, federal and State agencies

Timeframe: Ongoing; Meet annually with the City's contracted fair housing and landlord-tenant legal organization, beginning in 2023, to assess patterns of fair housing issues, and plan and target outreach, education, and services to address ongoing and new issues. Ensure all information and services are available in appropriate languages by June 2023, updating annually or as needed.

Program 5.b – Encourage a Variety of Housing Types

Review and revise South Pasadena's zoning regulations as needed to ensure they allow for a variety of housing types that can meet the needs of diverse residents. Consider zoning revisions that allow a wide range of unit sizes while encouraging the provision of an adequate supply of larger units for families, multi-generational households, and intentional communities (e.g., cohousing). Review the zoning code's ability and incorporate the provisions of SB 9 to allow for classic California housing types, such as bungalow courts and stacked or side-by-side duplexes, which can help provide housing diversity in a residential neighborhood context. (See also programs under Goals 2 and 3.) To affirmatively promote more inclusive communities, the City will also review and revise the City's requirements for Residential Care Facilities with seven or more persons by June 2022 and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The zoning districts where this change is needed include RE, RS, RM, and RH. These types of facilities are still subject to State licensing requirements, when a state license is a requirement for the residential care facility.

Eight-year Objective: Diversify housing types in new development throughout South Pasadena, including: residential care facilities; roughly equal proportions of efficiency, one-bedroom, two-bedroom, and three- or more bedroom units; and roughly equal proportions of for-rent and for-sale housing.

Responsible Agency: Community Development Department

Funding Source: General fund, State, and federal funds

Timeframe: First zoning text amendment within 120 days after adoption of a compliant housing element. Make additional zoning revisions within three years of Housing Element adoption; ongoing monitoring and encouragement.

Program 5.c – Removal of Racially Restrictive Covenants from Property Deeds Citywide

In the 1940's, covenants that restricted the sale of property to white people only were prevalent in the City, especially on residential properties. Although such covenants were declared unconstitutional and have not been enforceable since 1948, many remain on recorded property deeds. Furthermore, there may still be racially restrictive covenants on properties owned by the City of South Pasadena. In compliance with City Council Resolution No. 7750, the "Sundown Town" Resolution, adopted on February 2, 2022, the City will review the deeds of all City-owned properties and remove any existing racially restrictive housing covenants found on them. In the future, any property purchased will require removal of any racially restrictive housing covenant prior to recording the property in the City's name. Additionally, a new State law (AB 1466), gives property owners the opportunity to remove racially restrictive covenants from their own deeds. Beginning on July 1, 2022, county recorders must provide a Restrictive Covenant Modification form to every person purchasing a property with a restrictive covenant, and establish an implementation plan to identify unlawful restrictive covenants in the records of their office. The City will develop a program to support and encourage individual property owners to remove such restrictions from their deeds and provide information about accessing the County process to do so. The City will use its social media platforms, website and other communications tools to conduct outreach and provide information at community events to assist homeowners to identify and remove restrictive covenants.

Eight-year Objective: Remove all racially restrictive covenants from South Pasadena City-owned properties by June 2023 and from privately-owned properties by the end of the planning period. Advertise County program as soon as the County releases details in 2022; launch website and social media campaigns to support property owners to voluntarily remove these covenants by December 2022, with ongoing reminders in City publications and at City events. Support County enforcement of this State requirement as appropriate through City actions. Work with at least 10 property owners annually to support their efforts to remove restrictions from their deeds.

Responsible Agency: Community Development Department; Los Angeles County Recorder

Funding Source: General Fund; grants if offered through a State or County program

Timeframe: Remove all covenants on City-owned properties by June 2023; launch informational campaign between June and December 2023; encouragement of removal from private properties: ongoing.

GOAL 6.0 Expand and strengthen tenant protections for South Pasadena's existing renters

South Pasadena renters are important members of the community and make up about 53.5% of the city's population. The City's efforts to advance housing that is affordable to people of all income levels must include not only longer-term strategies like facilitating housing production, but also policies and programs that help South Pasadena's existing renters remain in (or return to) their homes and their broader community. To that end, the City is committed to ensuring that all of its renter households maintain housing stability and affordability so that they can stay and thrive in South Pasadena.

Policy 6.1 Collect and monitor data on South Pasadena's affordable and market rate rental housing stock, including the rents, tenancy, and affordability details of certain rental units.

Policy 6.2 Provide information on applicable state and local tenant protections to both landlords and tenants.

Policy 6.3 Establish and/or strengthen local tenant protections to mitigate or prevent housing instability and displacement of South Pasadena residents who rent their homes.

Program 6.a – Rent Registry

Staff will research, develop, and propose to City Council a local rent registry program. A rent registry program would require owners of certain, to-be-determined, rental property types (those with a minimum number of units, for instance) to register their units and pay a per-unit registration fee on an annual basis. Staff envision the rent registry serving initially as a database that the City would use to collect and track rental data on units, including affordable units, and to disseminate information to property owners about tenant protections. However, the utility of the rent registry could be expanded over time to incorporate additional monitoring, compliance, and enforcement activities as new programs are established and linked to it. Staff will draw from thorough analysis to develop the details of the program, which will be subject to the approval of City Council.

Eight-year Objective: City will have a comprehensive online database of all affordable and market-rate rental housing units in South Pasadena subject to the registration requirement with a user interface

and fee payment system for rental property owners. The registry will be updated annually and serve as a streamlined platform for Community Development staff to track the City's rental housing inventory and provide information to rental housing property owners. City will decide whether to link this registry to the administration of other activities and programs.

Funding Source: General fund (staff time for development and administration); registration fees from property owners

Responsible Agency: Community Development Department (Housing Division)

Timeframe: Propose policy to City Council by February 2024. Complete development of rent registry by 2025. Begin implementation of rent registry by 2026.

Program 6.b – Right to Return Policy

Local and regional housing and tenants' groups have raised concerns about the displacement of tenants in South Pasadena, and across Los Angeles County, due to renovation work initiated by the landlord. To address these concerns, staff will research, develop, and propose to City Council a policy that establishes a tenant's legal right to return to a property at a comparable rent after eviction and/or relocation due to substantial remodel or other just cause reasons. The details of such a policy will be informed by rigorous research of local examples, community input, and careful legal analysis.

Eight-year Objective: In qualifying circumstances, all tenants who are temporarily displaced from their units due to construction work and wish to return upon completion will be able to do so under the law. Thus, this policy will stem permanent the permanent displacement of renters from South Pasadena due to just cause no-fault evictions and/or relocation for certain reasons.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program)

Timeframe: Propose policy to City Council as part of a broader tenant protections ordinance by December 2023.

Program 6.c – Relocation Assistance

In 2019 and 2021, in response to the COVID-19 pandemic, City Council passed two urgency just cause ordinances that require the landlord to pay relocation assistance to the tenant when evicting the tenant for a just cause no-fault reason. Beyond South Pasadena, cities across Los Angeles County have their own relocation assistance requirements for just cause evictions, which commonly require the landlord to pay at least 2.5 times the Fair Market Rent or current rent in addition to an allowance for moving expenses. Some cities, like Los Angeles and Pasadena, also have requirements for the landlord to pay temporary relocation assistance to a tenant when certain types of work require the tenant to temporarily vacate the unit. Staff will review the urgency just cause ordinances, perform more thorough research and analysis, and draft and propose to City Council a new permanent ordinance with permanent and temporary relocation assistance requirements for just cause no-fault evictions and temporary relocation for certain reasons.

Eight-year Objective: South Pasadena renters will have local tenant protections that reduce the financial burden placed on tenants when they are (temporarily or permanently) displaced from their homes for legally permitted reason and instead place financial obligations onto the property owners.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program); property owners

Timeframe: Propose policy to City Council by December 2023.

Program 6.d – Rent Stabilization

Staff will research, develop, and propose to City Council a rent stabilization policy to protect South Pasadena's renters of certain properties from excessive rent increases that undermine housing affordability and stability. A local rent stabilization program would establish a lower cap on rent increases than that set in the Tenant Protection Act pursuant to AB 1482 to the extent permitted by the Costa-Hawkins Rental Housing Act, which prohibits cities from applying rent stabilization to certain properties, including single-family homes, condos, and properties built after 1995.

Eight-year Objective: Reduce high rent burdens and forced moves among South Pasadena's renters due to excess rent increases and, in turn, increase their financial security and housing stability.

Responsible Agency: Community Development Department (Housing Division); contracted landlord-tenants law organization

Funding Source: General fund (staff time to develop the program)

Timeframe: Propose policy to City Council by December 2023.

6.8.2 Summary of Quantified Objectives

The quantified objectives for the 2021-2029 Housing Element Planning period reflect the provision of sites for development of new housing and for rehabilitation and preservation. The quantified objectives are described by income category in Table VI-56.

Table VI-576
QUANTIFIED HOUSING IMPLEMENTATION SUMMARY

INCOME CATEGORY	NEW CONSTRUCTION	PRESERVED[1]	REHABILITATED[1]
Extremely Low/Very Low Income	757	7	8
Low Income	398	24	8
Moderate Income	334	4	9
Above Moderate	578	6	10
Total	2,067	41	35

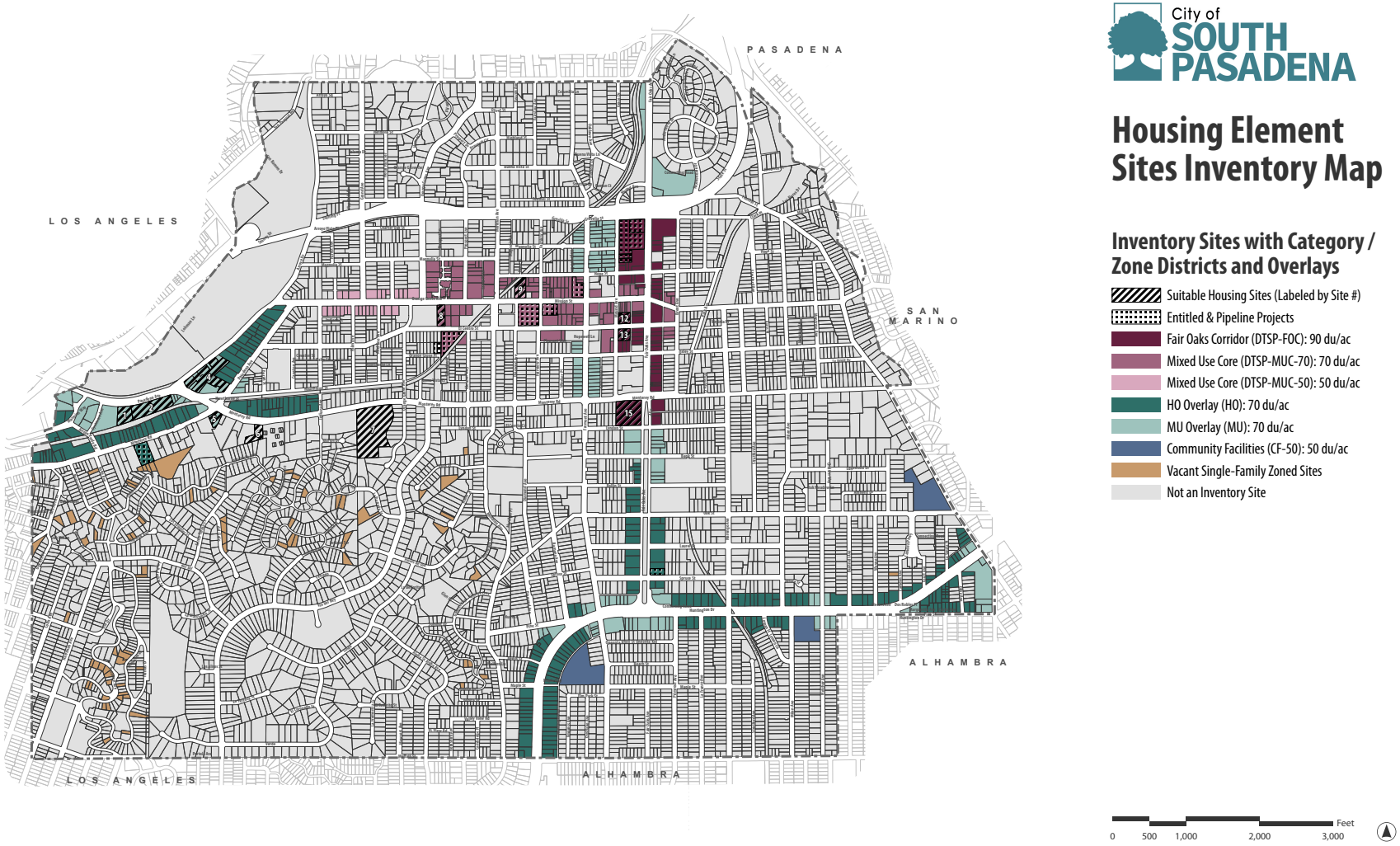
1. Note that no housing units have been identified as at risk of conversion to market rate in South Pasadena within 10 years of the beginning of the 6th-cycle planning period, however there are preservation and rehabilitation needs in the community, therefore units have been included in both columns. The number of units is based the quantified objectives in Program 1.c, 2.c, and 2.d.

Appendix A:
Sites Exhibits

Maps and Exhibits - 2021-2029 Housing Element

- Citywide Maps of Sites in the Land Inventory
- ~~Overview Maps of Sites to Address the Lower-Income RHNA or with Pending or Approved Applications~~
- Detailed Exhibits for Sites to Address the Lower-Income RHNA or with Pending or Approved Applications
- ~~Additional Sites Map within the Downtown Specific Plan Boundary~~

Figure A-1.a. Citywide Sites Inventory Map (new site inventory maps from A1-2 to A1-17)





City of SOUTH PASADENA

Housing Element Sites Inventory Map

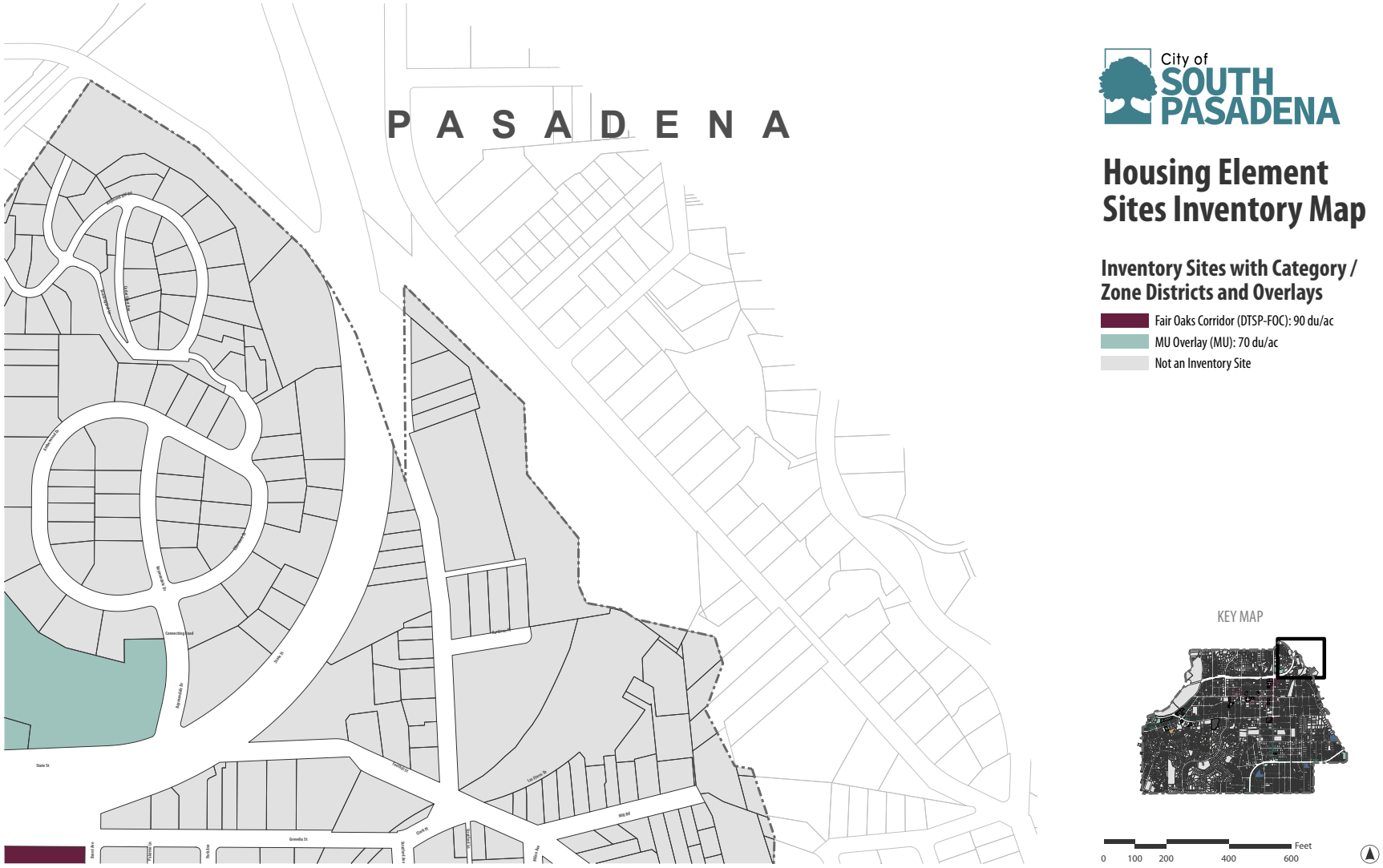
Inventory Sites with Category / Zone Districts and Overlays

- Entitled & Pipeline Projects
- Fair Oaks Corridor (DTSP-FOC): 90 du/ac
- MU Overlay (MU): 70 du/ac
- Not an Inventory Site

KEY MAP

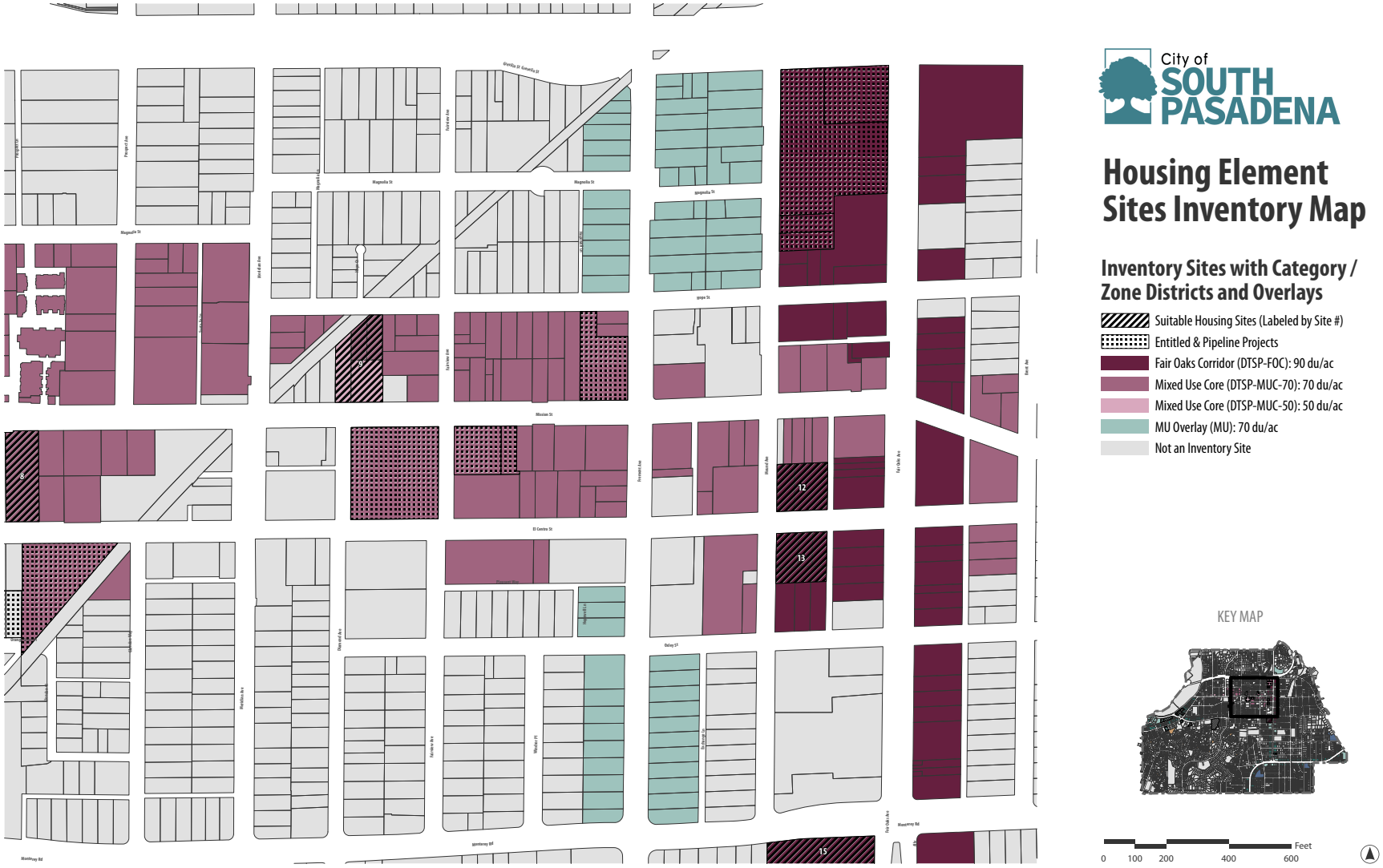


0 100 200 400 600 Feet


PASADENA
City of
SOUTH
PASADENA
Housing Element
Sites Inventory Map
Inventory Sites with Category /
Zone Districts and Overlays
Fair Oaks Corridor (DTSP-FOC): 90 du/ac
MU Overlay (MU): 70 du/ac
Not an Inventory Site
KEY MAP
Feet
0
100
200
400
600


LOS ANGELES
City of
SOUTH
PASADENA
Housing Element
Sites Inventory Map
Inventory Sites with Category /
Zone Districts and Overlays
Suitable Housing Sites (Labeled by Site #)
HO Overlay (HO): 70 du/ac
MU Overlay (MU): 70 du/ac
Not an Inventory Site
KEY MAP
Feet
0
100
200
400
600


City of
SOUTH
PASADENA
Housing Element
Sites Inventory Map
Inventory Sites with Category /
Zone Districts and Overlays
Suitable Housing Sites (Labeled by Site #)
Entitled & Pipeline Projects
Mixed Use Core (DTSP-MUC-70): 70 du/ac
Mixed Use Core (DTSP-MUC-50): 50 du/ac
HO Overlay (HO): 70 du/ac
MU Overlay (MU): 70 du/ac
Not an Inventory Site
KEY MAP
0
100
200
400
600
Feet


City of
SOUTH
PASADENA
Housing Element
Sites Inventory Map
Inventory Sites with Category /
Zone Districts and Overlays
Suitable Housing Sites (Labeled by Site #)
Entitled & Pipeline Projects
Fair Oaks Corridor (DTSP-FOC): 90 du/ac
Mixed Use Core (DTSP-MUC-70): 70 du/ac
Mixed Use Core (DTSP-MUC-50): 50 du/ac
MU Overlay (MU): 70 du/ac
Not an Inventory Site
KEY MAP
0
100
200
400
600
Feet



City of SOUTH PASADENA

Housing Element Sites Inventory Map

Inventory Sites with Category / Zone Districts and Overlays

- Fair Oaks Corridor (DTSP-FOC): 90 du/ac
- Mixed Use Core (DTSP-MUC-70): 70 du/ac
- Not an Inventory Site

KEY MAP



0 100 200 400 600 Feet



City of SOUTH PASADENA

Housing Element Sites Inventory Map

Inventory Sites with Category / Zone Districts and Overlays

- Suitable Housing Sites (Labeled by Site #)
- Entitled & Pipeline Projects
- HO Overlay (HO): 70 du/ac
- MU Overlay (MU): 70 du/ac
- Vacant Single-Family Zoned Sites
- Not an Inventory Site

KEY MAP



0 100 200 400 600 Feet



City of SOUTH PASADENA

Housing Element Sites Inventory Map

Inventory Sites with Category / Zone Districts and Overlays

- Suitable Housing Sites (Labeled by Site #)
- HO Overlay (HO): 70 du/ac
- MU Overlay (MU): 70 du/ac
- Vacant Single-Family Zoned Sites
- Not an Inventory Site

KEY MAP



0 100 200 400 600 Feet



City of SOUTH PASADENA

Housing Element Sites Inventory Map

Inventory Sites with Category / Zone Districts and Overlays

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KEY MAP



0 100 200 400 600 Feet



City of SOUTH PASADENA

Housing Element Sites Inventory Map

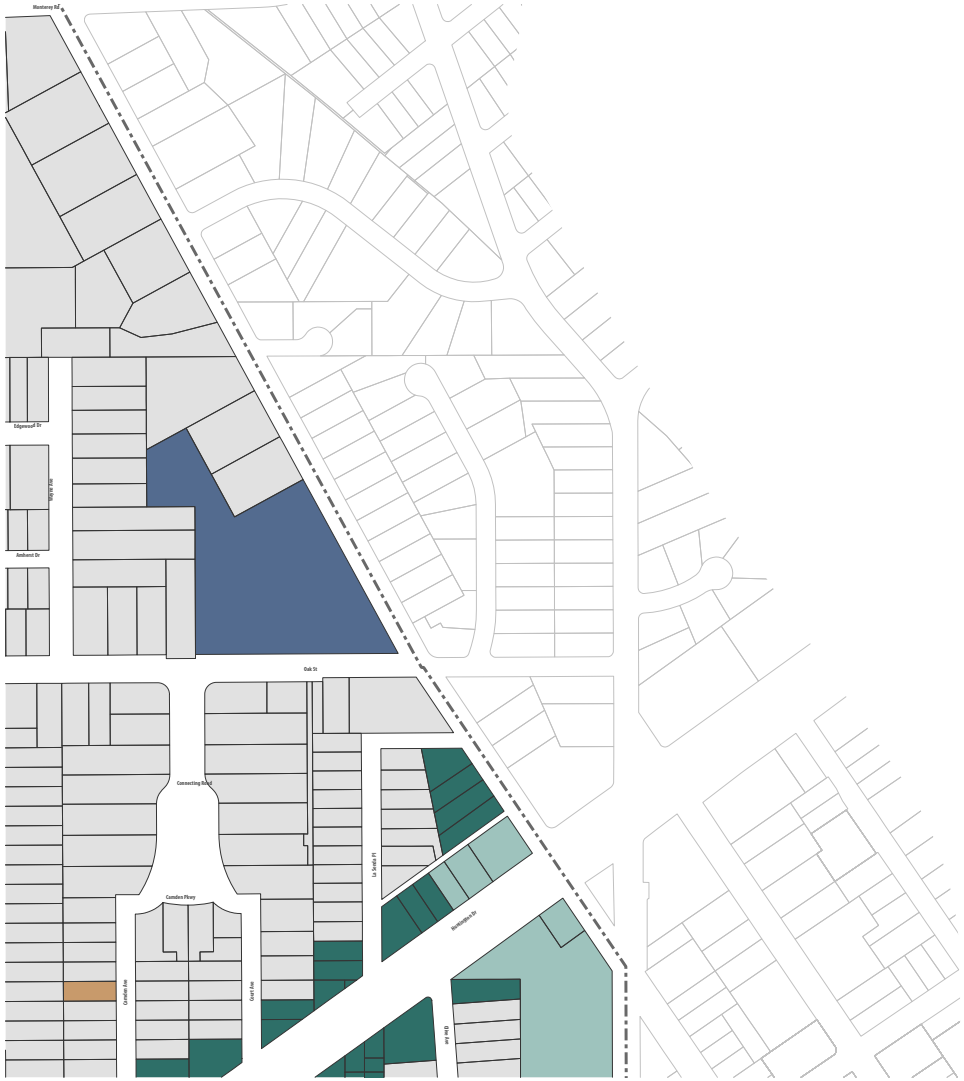
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- MU Overlay (MU): 70 du/ac
- Vacant Single-Family Zoned Sites
- Not an Inventory Site

KEY MAP



0 100 200 400 600 Feet



City of SOUTH PASADENA

Housing Element Sites Inventory Map

Inventory Sites with Category / Zone Districts and Overlays

- HO Overlay (HO): 70 du/ac
- MU Overlay (MU): 70 du/ac
- Community Facilities (CF-50): 50 du/ac
- Vacant Single-Family Zoned Sites
- Not an Inventory Site

KEY MAP







City of SOUTH PASADENA

Housing Element Sites Inventory Map

Inventory Sites with Category / Zone Districts and Overlays

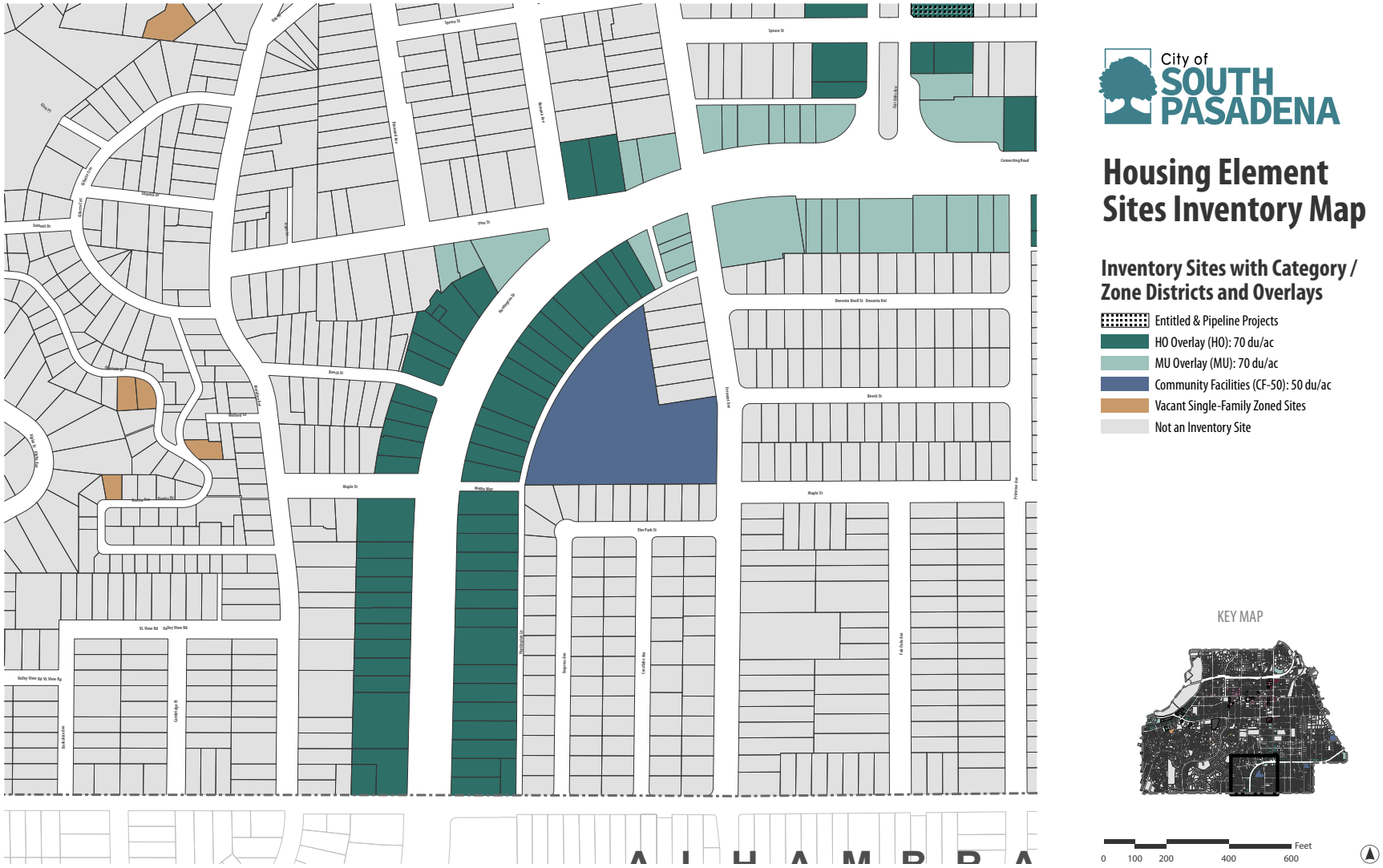
Vacant Single-Family Zoned Sites

Not an Inventory Site

KEY MAP



0 100 200 400 600 Feet


City of
SOUTH
PASADENA
Housing Element
Sites Inventory Map
Inventory Sites with Category /
Zone Districts and Overlays
Entitled & Pipeline Projects
HO Overlay (HO): 70 du/ac
MU Overlay (MU): 70 du/ac
Community Facilities (CF-50): 50 du/ac
Vacant Single-Family Zoned Sites
Not an Inventory Site
KEY MAP
Feet
0
100
200
400
600



City of SOUTH PASADENA

Housing Element Sites Inventory Map

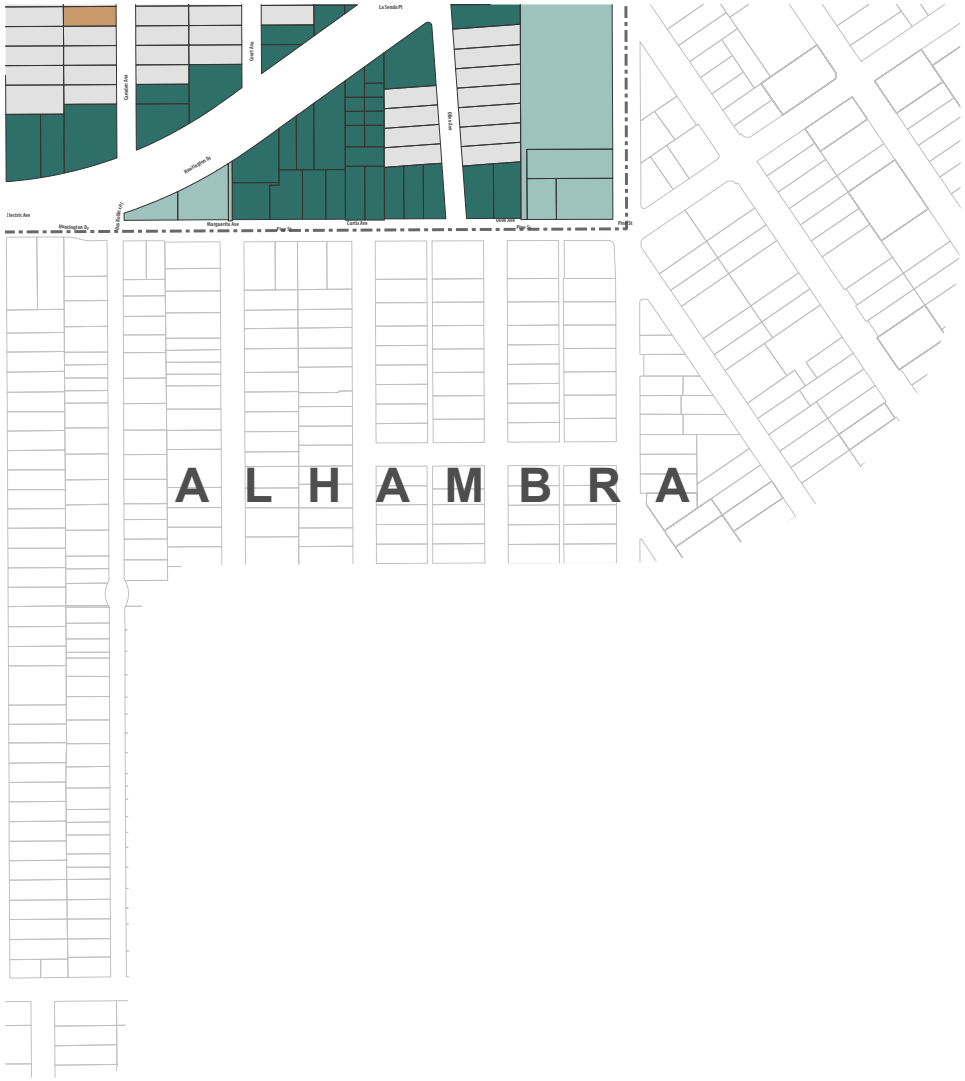
Inventory Sites with Category / Zone Districts and Overlays

- Entitled & Pipeline Projects
- HO Overlay (HO): 70 du/ac
- MU Overlay (MU): 70 du/ac
- Community Facilities (CF-50): 50 du/ac
- Vacant Single-Family Zoned Sites
- Not an Inventory Site

KEY MAP



0 100 200 400 600 Feet



City of SOUTH PASADENA

Housing Element Sites Inventory Map

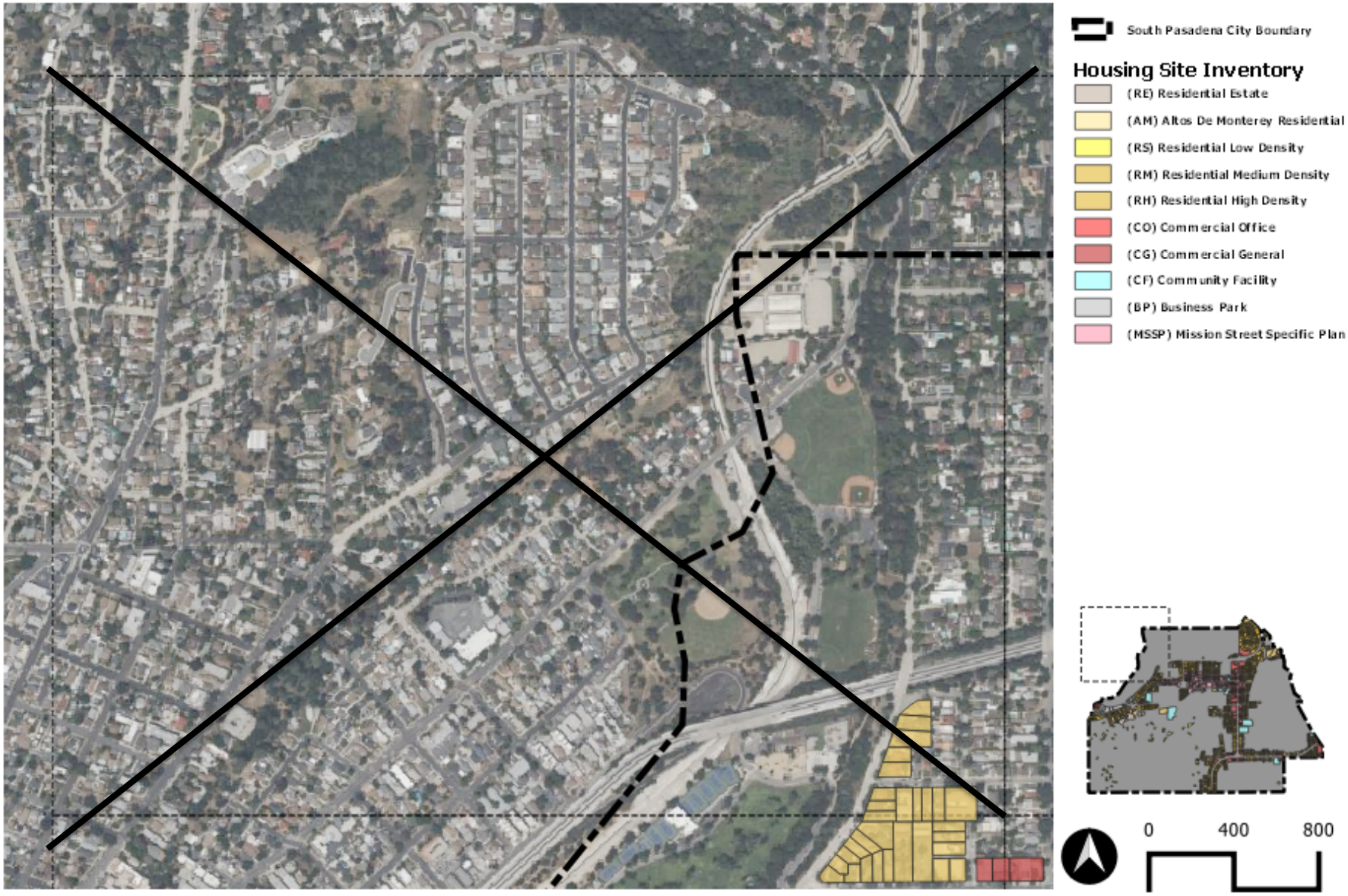
Inventory Sites with Category / Zone Districts and Overlays

- HO Overlay (HO): 70 du/ac
- MU Overlay (MU): 70 du/ac
- Vacant Single-Family Zoned Sites
- Not an Inventory Site

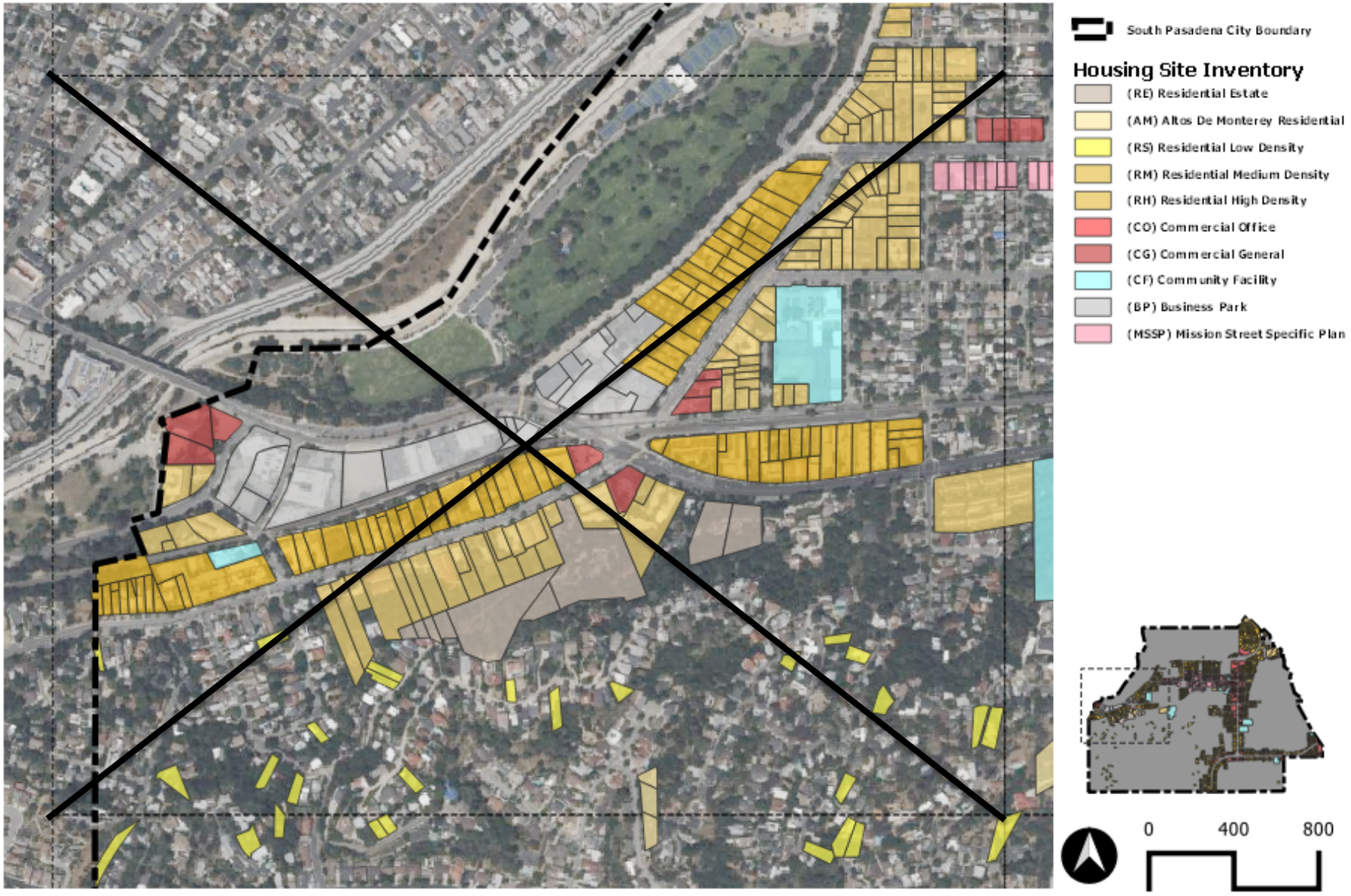
KEY MAP



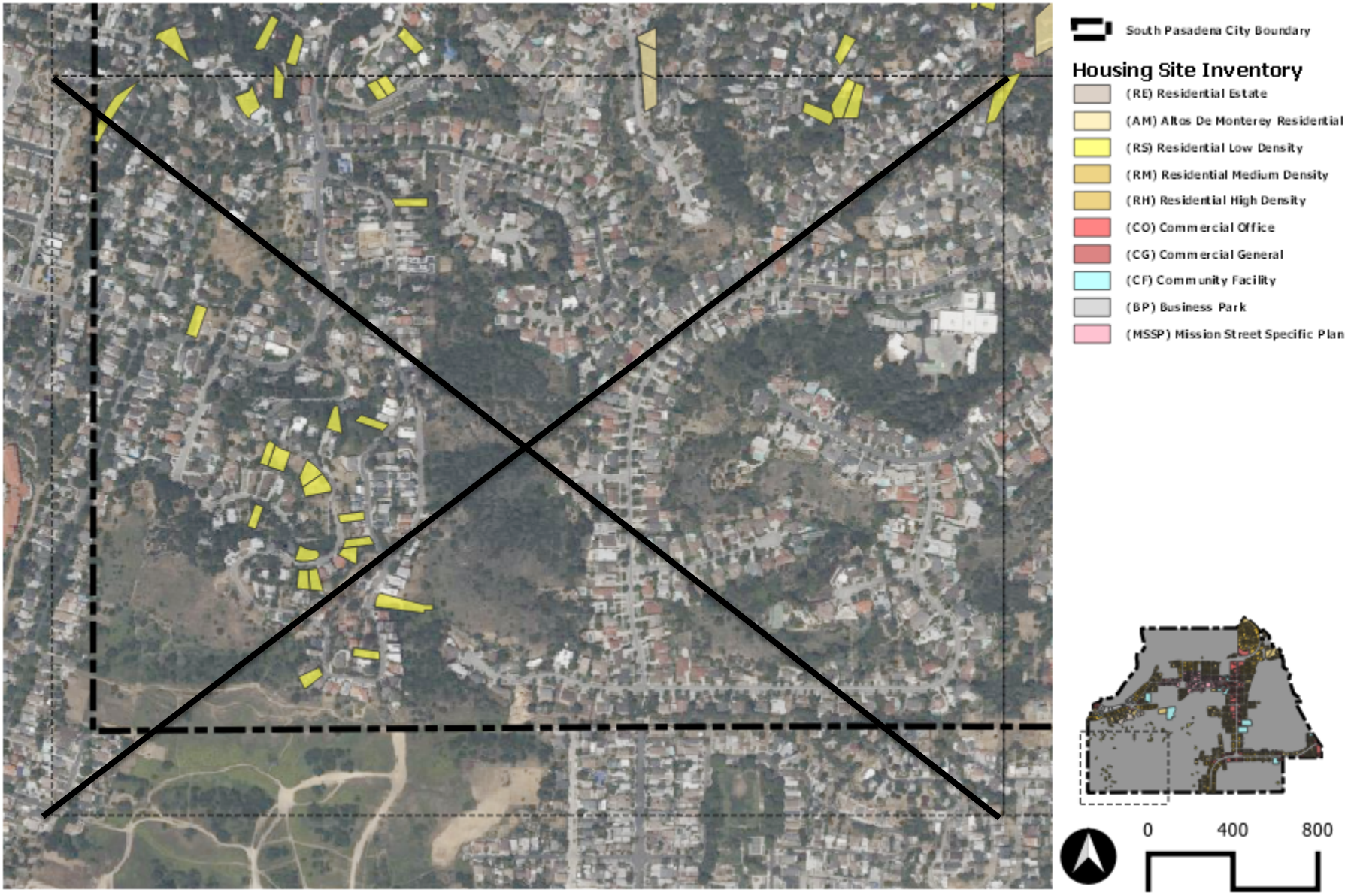
0 100 200 400 600 Feet


South Pasadena City Boundary
Housing Site Inventory
(RE) Residential Estate
(AM) Altos De Monterey Residential
(RS) Residential Low Density
(RM) Residential Medium Density
(RH) Residential High Density
(CO) Commercial Office
(CG) Commercial General
(CF) Community Facility
(BP) Business Park
(MSSP) Mission Street Specific Plan
0
400
800

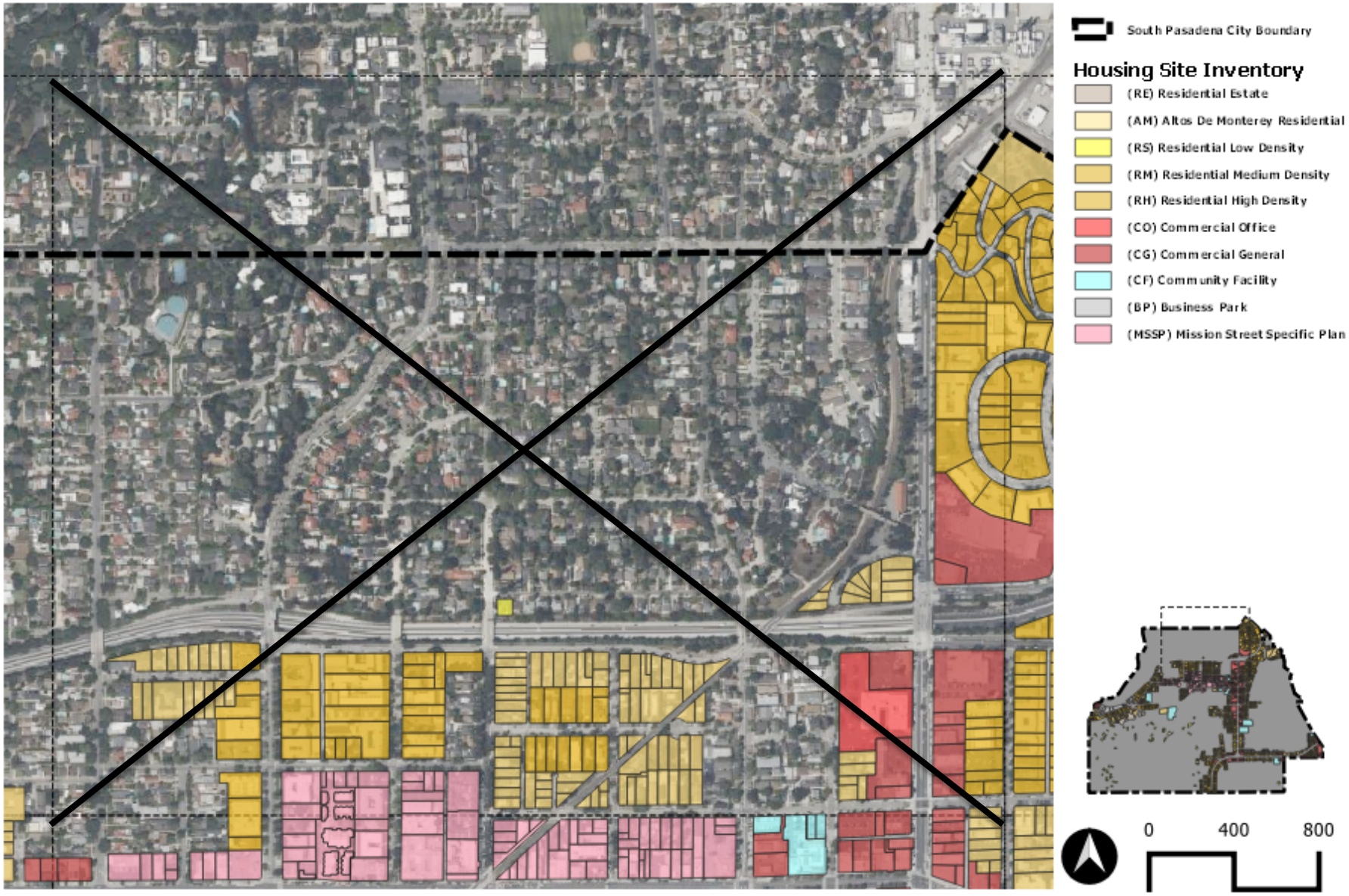
~~**Figure A-1.b. Citywide Sites Inventory Map (2)**~~



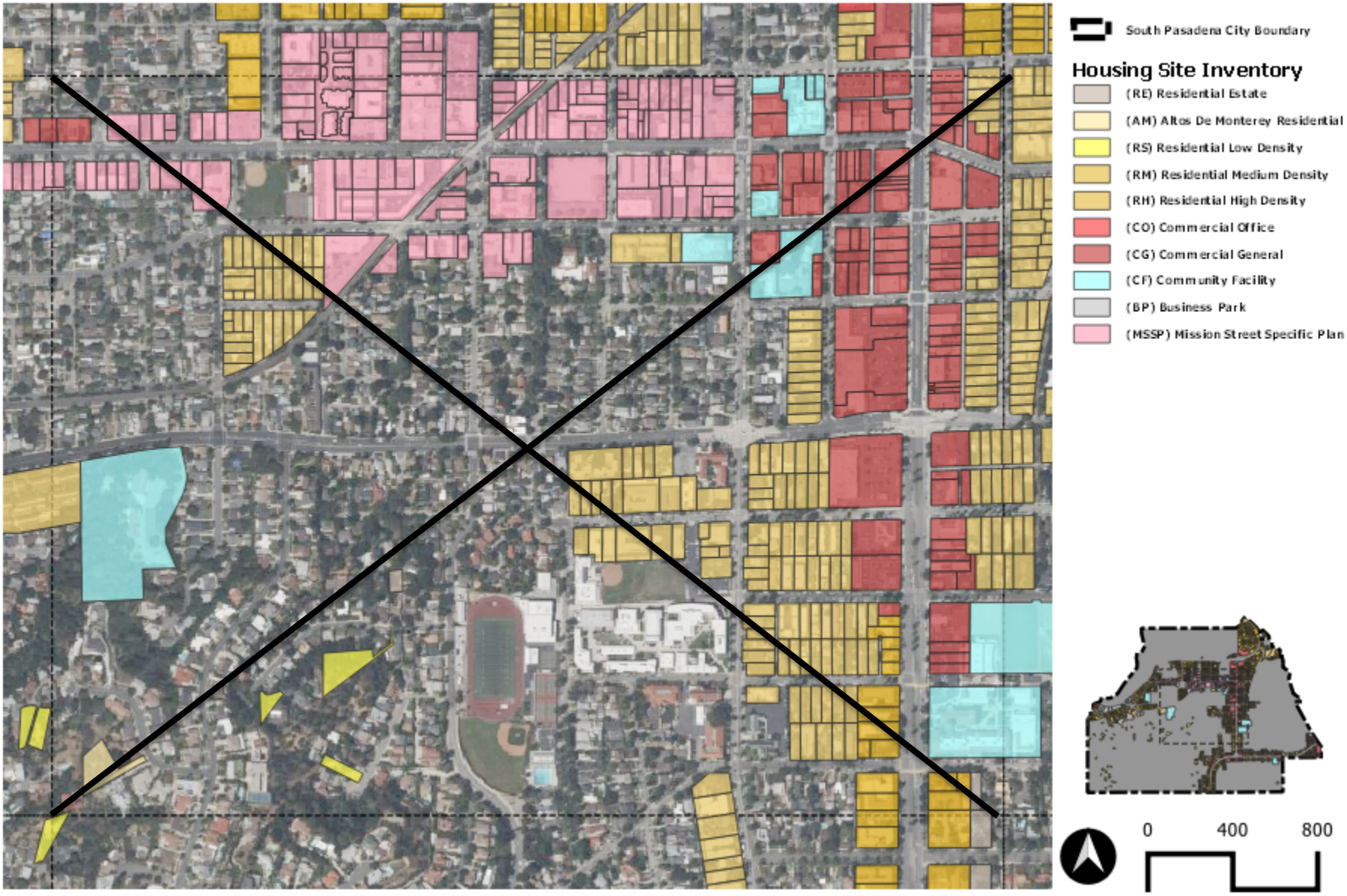
~~Figure A-1.c. Citywide Sites Inventory Map (3)~~



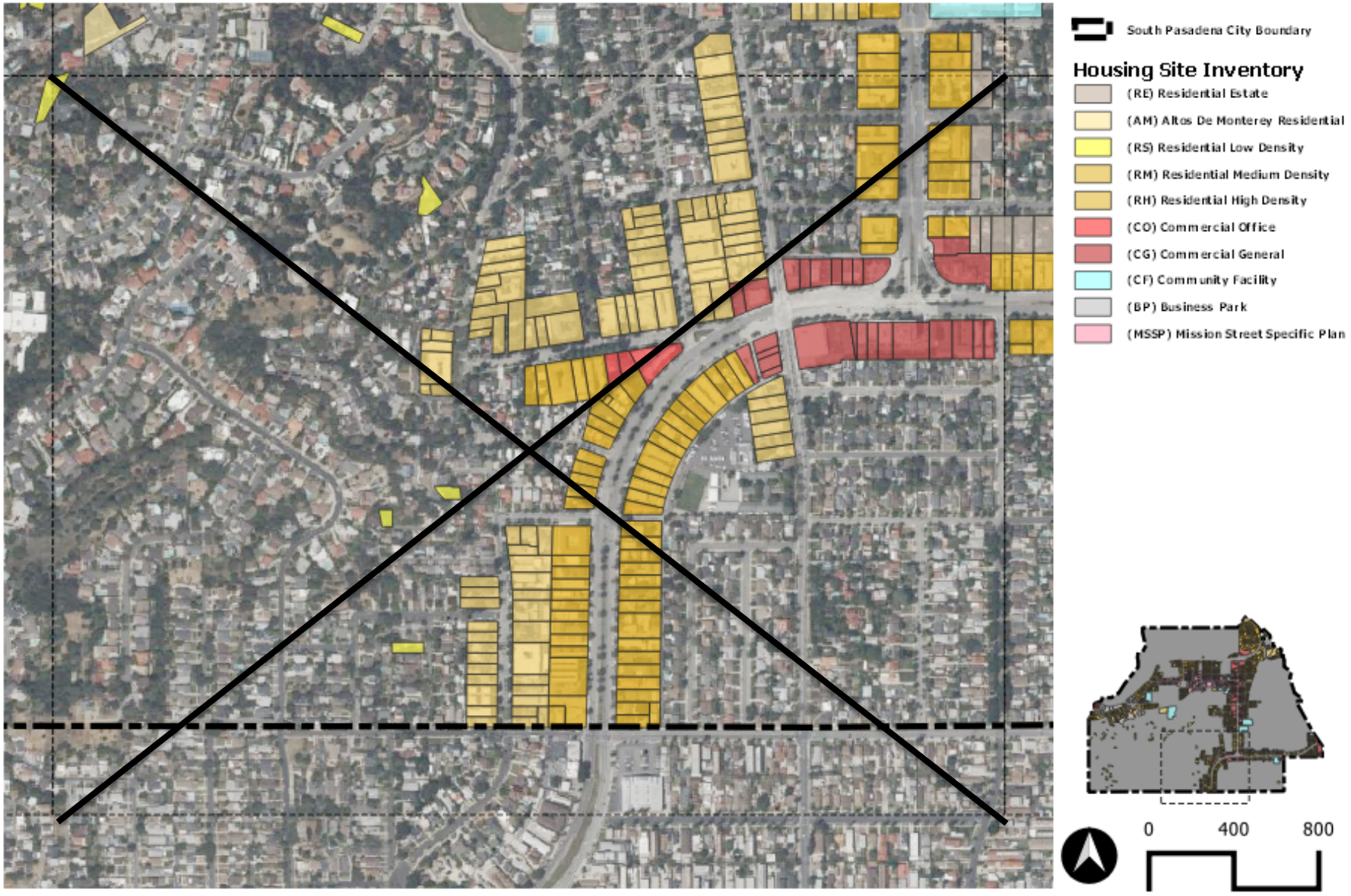
~~**Figure A-1.d. Citywide Sites Inventory Map (4)**~~



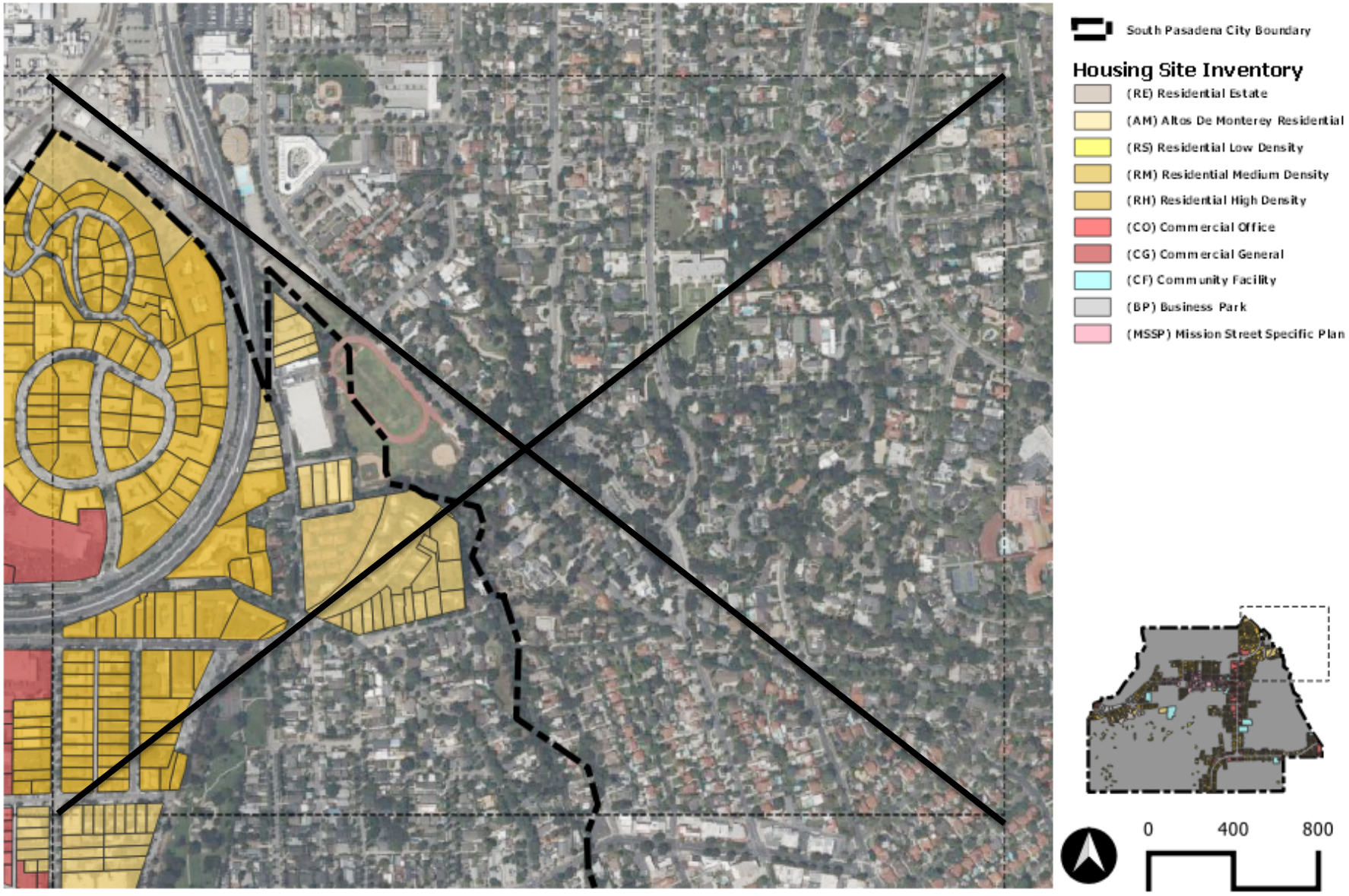
~~**Figure A-1.e. Citywide Sites Inventory Map (5)**~~



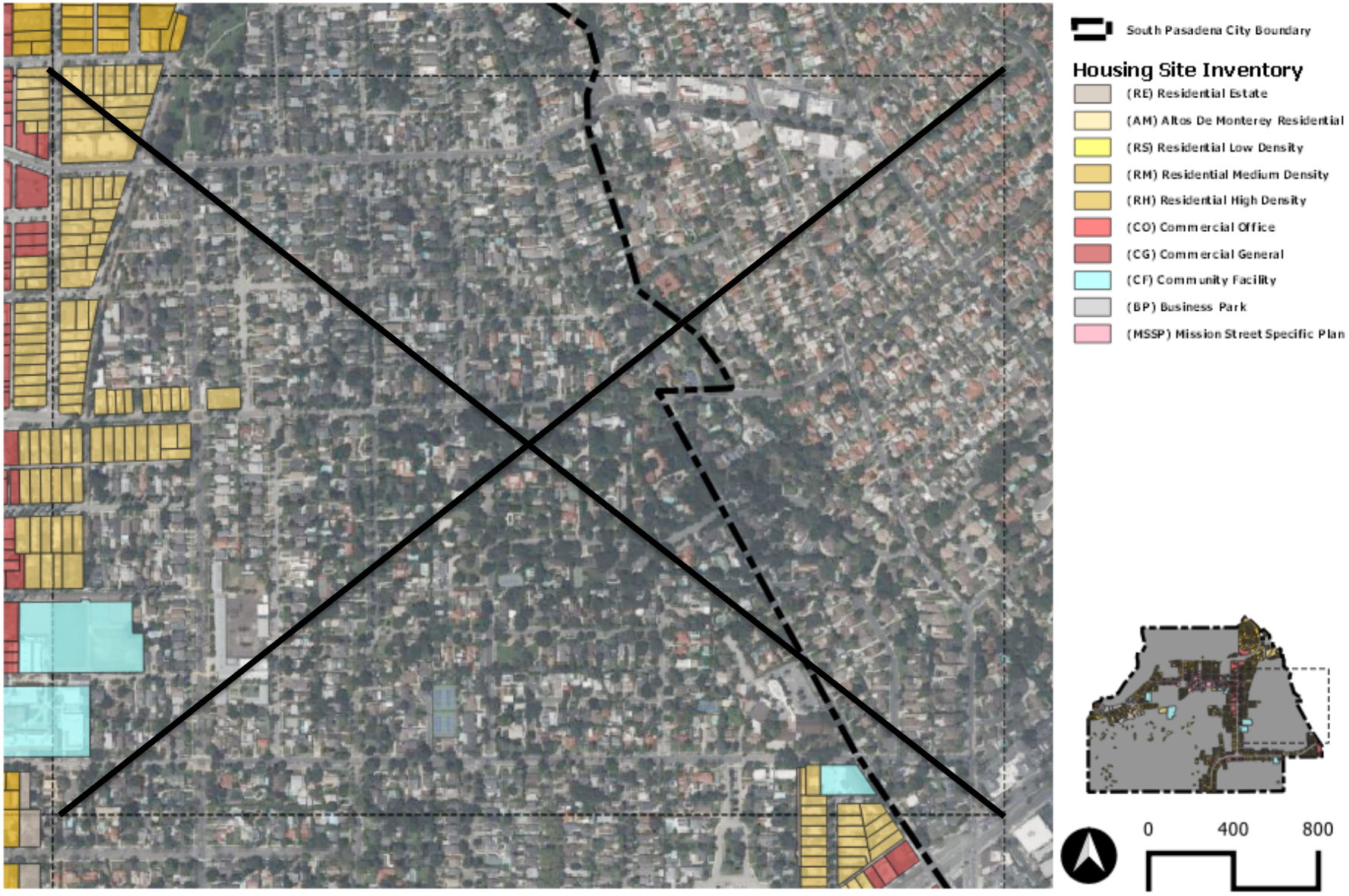
~~**Figure A-1.f. Citywide Sites Inventory Map (6)**~~



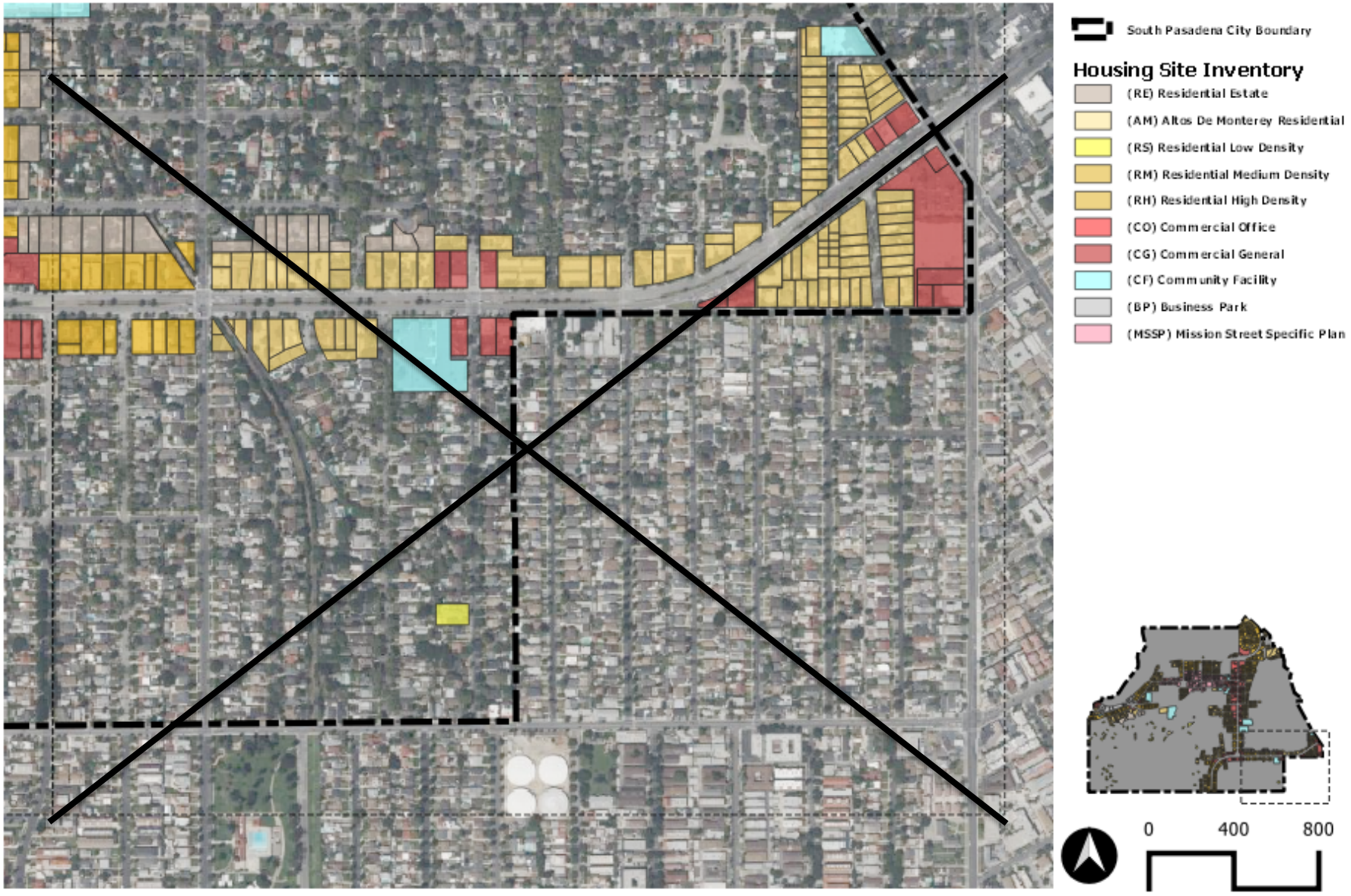
~~Figure A-1.g. Citywide Sites Inventory Map (7)~~



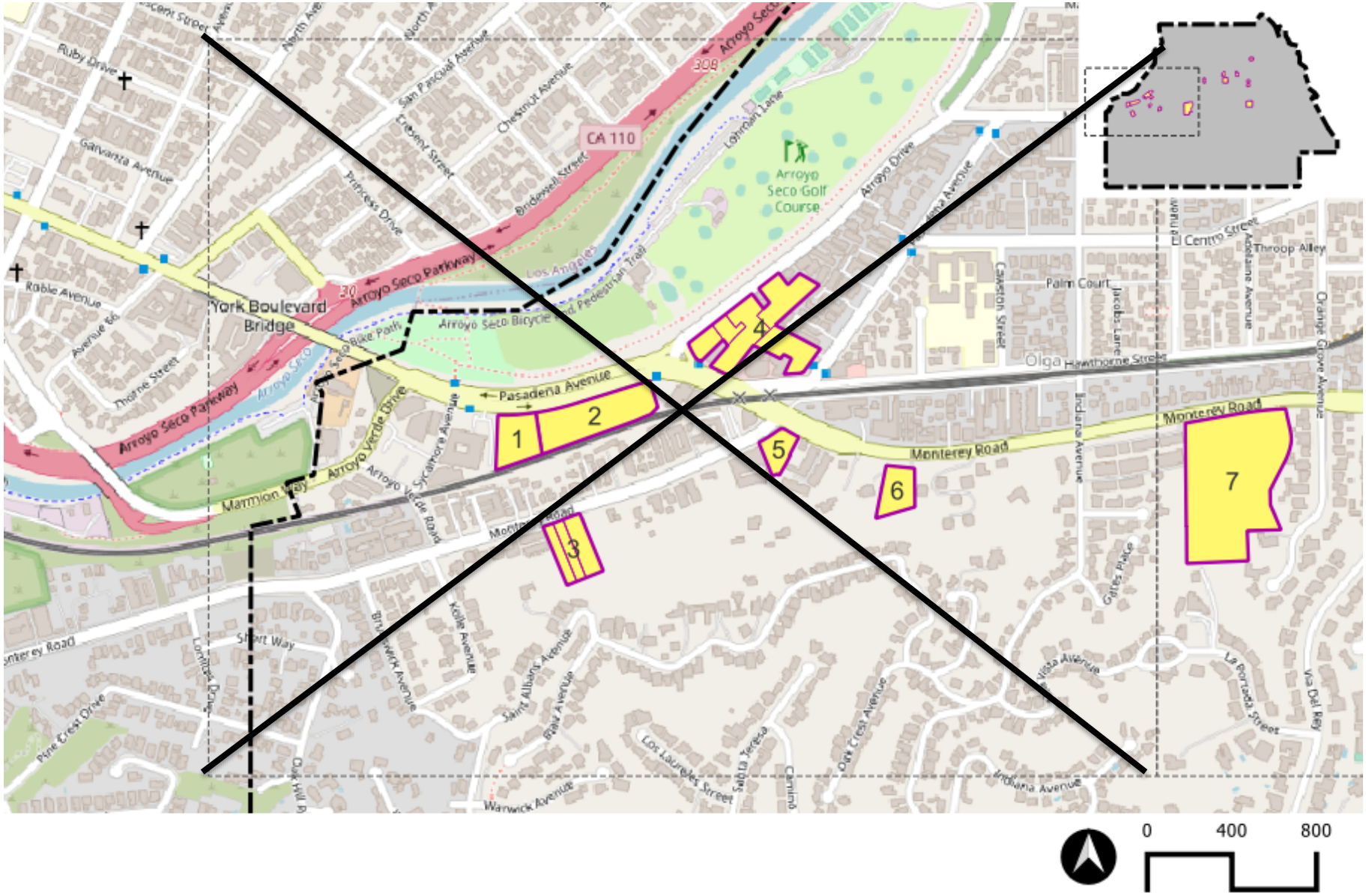
~~**Figure A-1.h. Citywide Sites Inventory Map (8)**~~



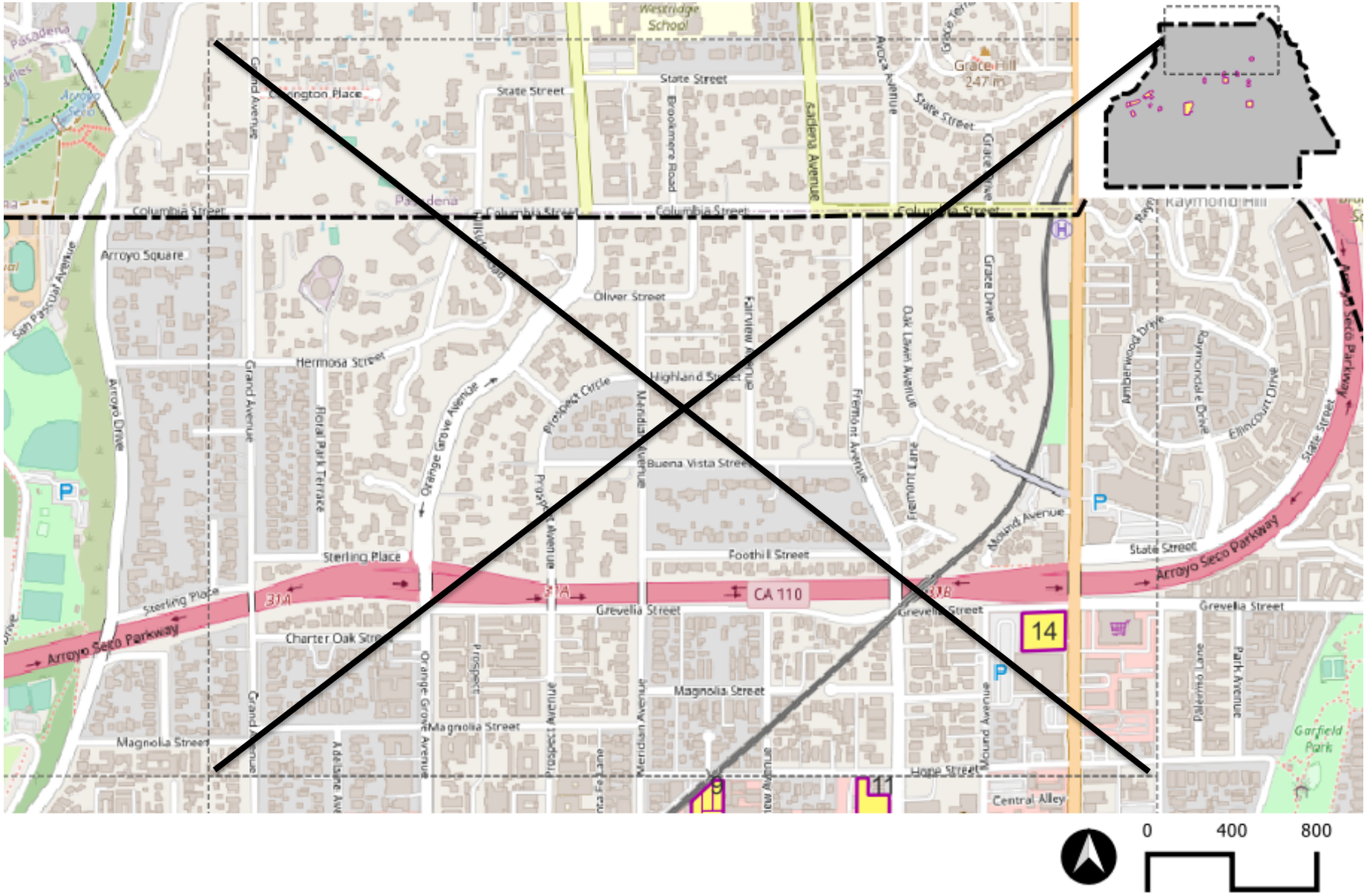
~~Figure A-1.i. Citywide Sites Inventory Map (9)~~



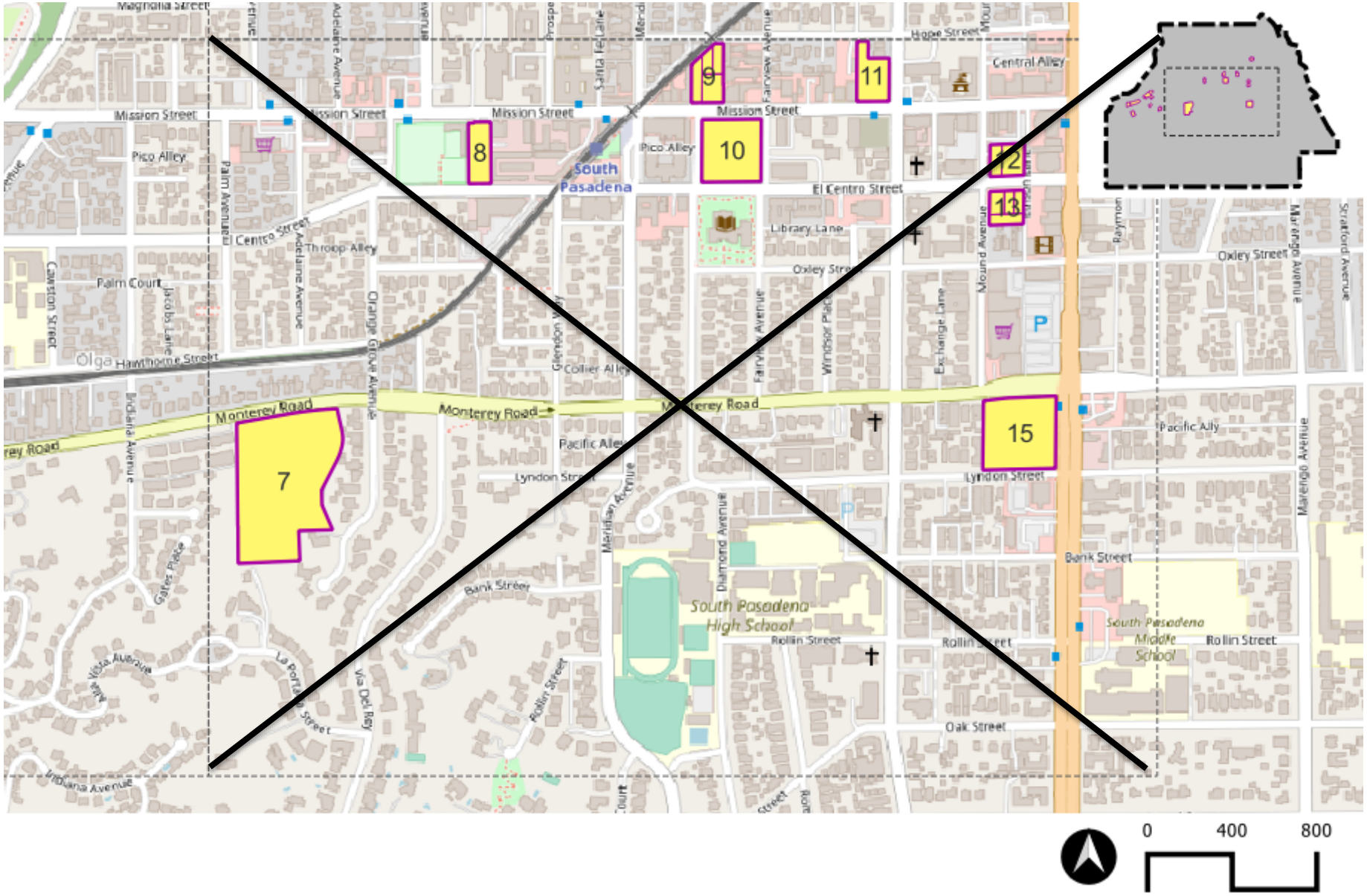
~~Figure A-2.a Maps of Sites to Address the Lower-Income RHNA Inventory (1) or with Pending or Approved Applications~~



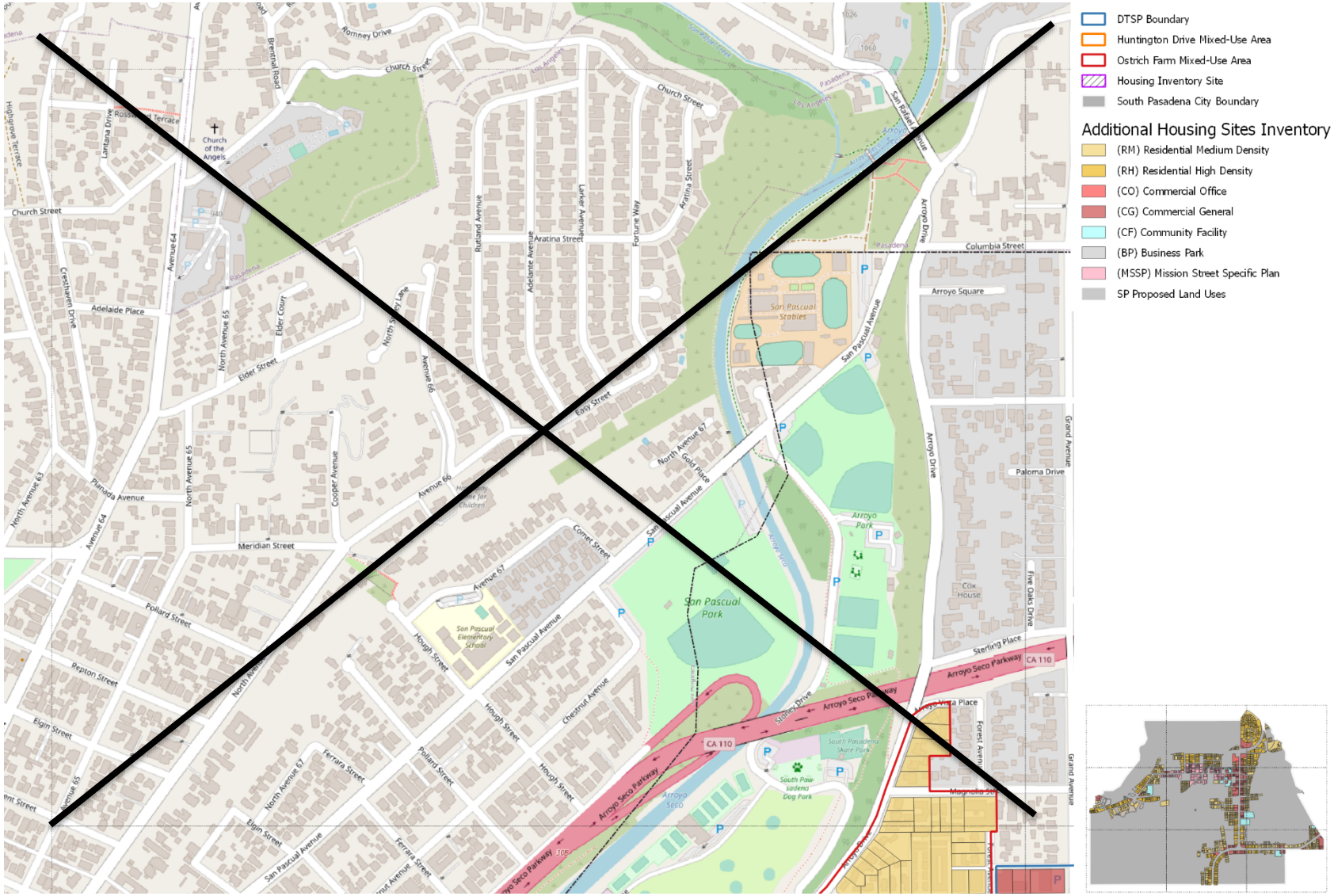
~~Figure A-2.b Maps of Sites to Address the Lower-Income RHNA Inventory (2) or with Pending or Approved Applications~~



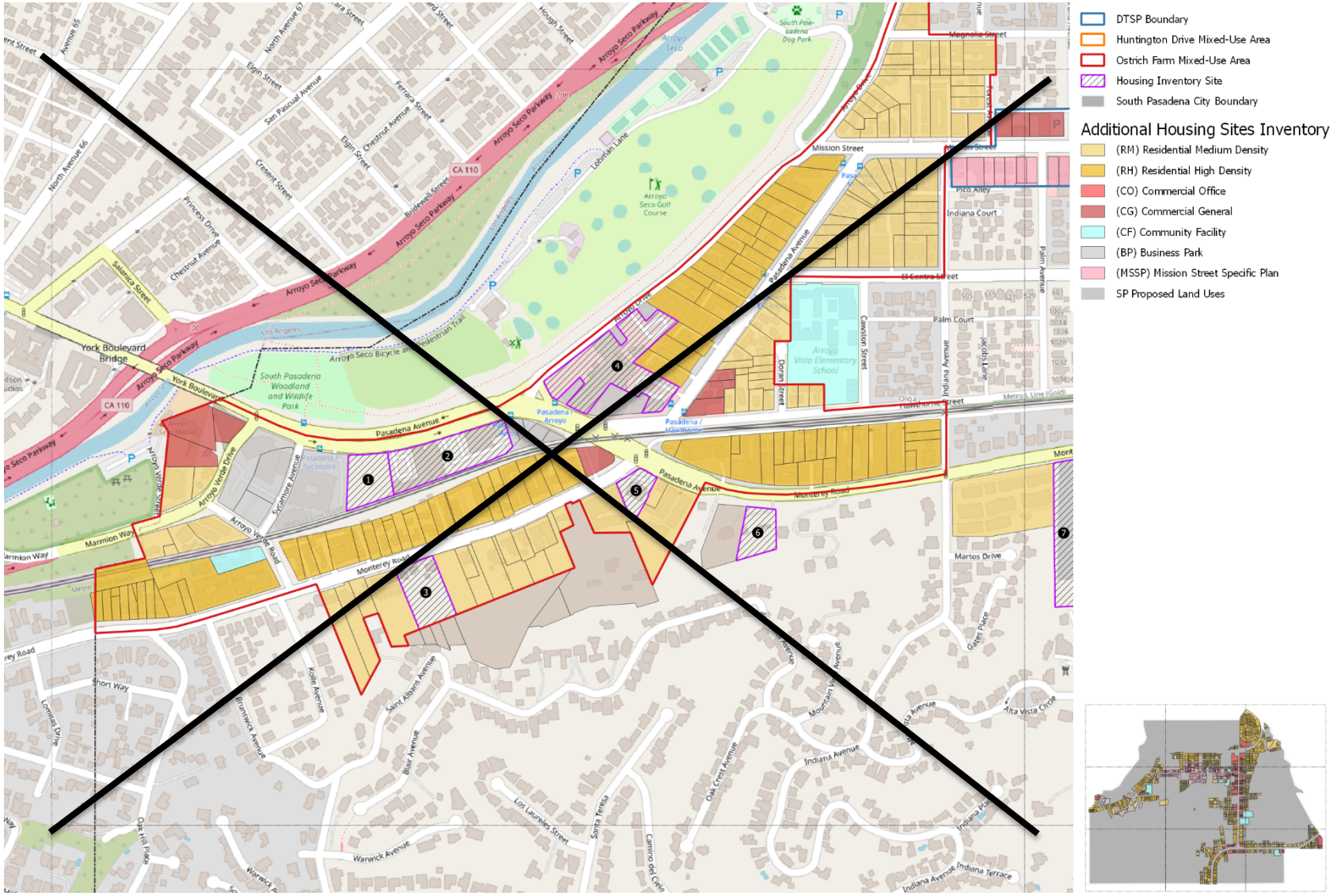
~~Figure A-2.c Maps of Sites to Address the Lower-Income RHNA Inventory (3) or with Pending or Approved Applications~~



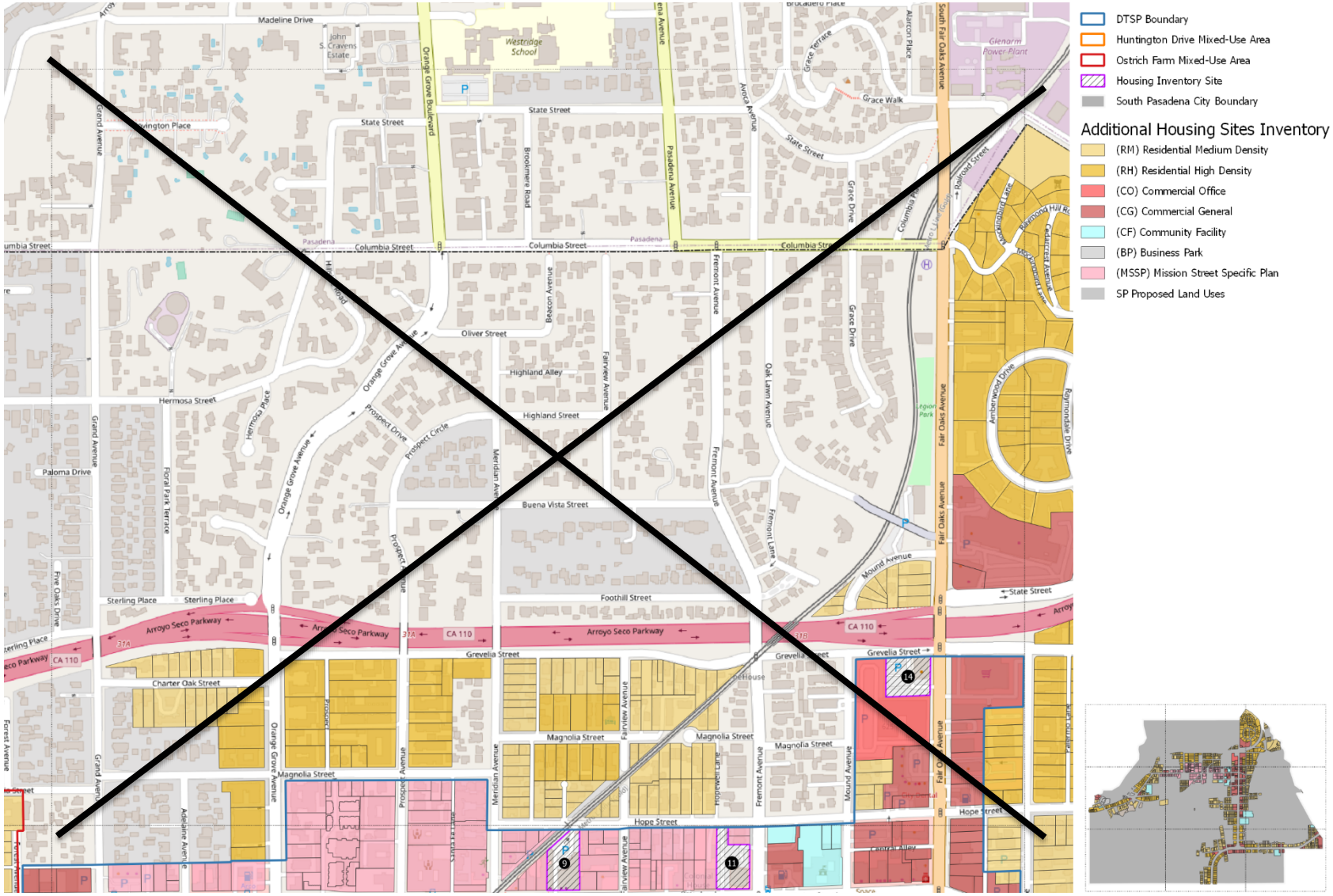
~~Figure A-3.a Map of Additional Sites to Accommodate Lower Income RHNA~~



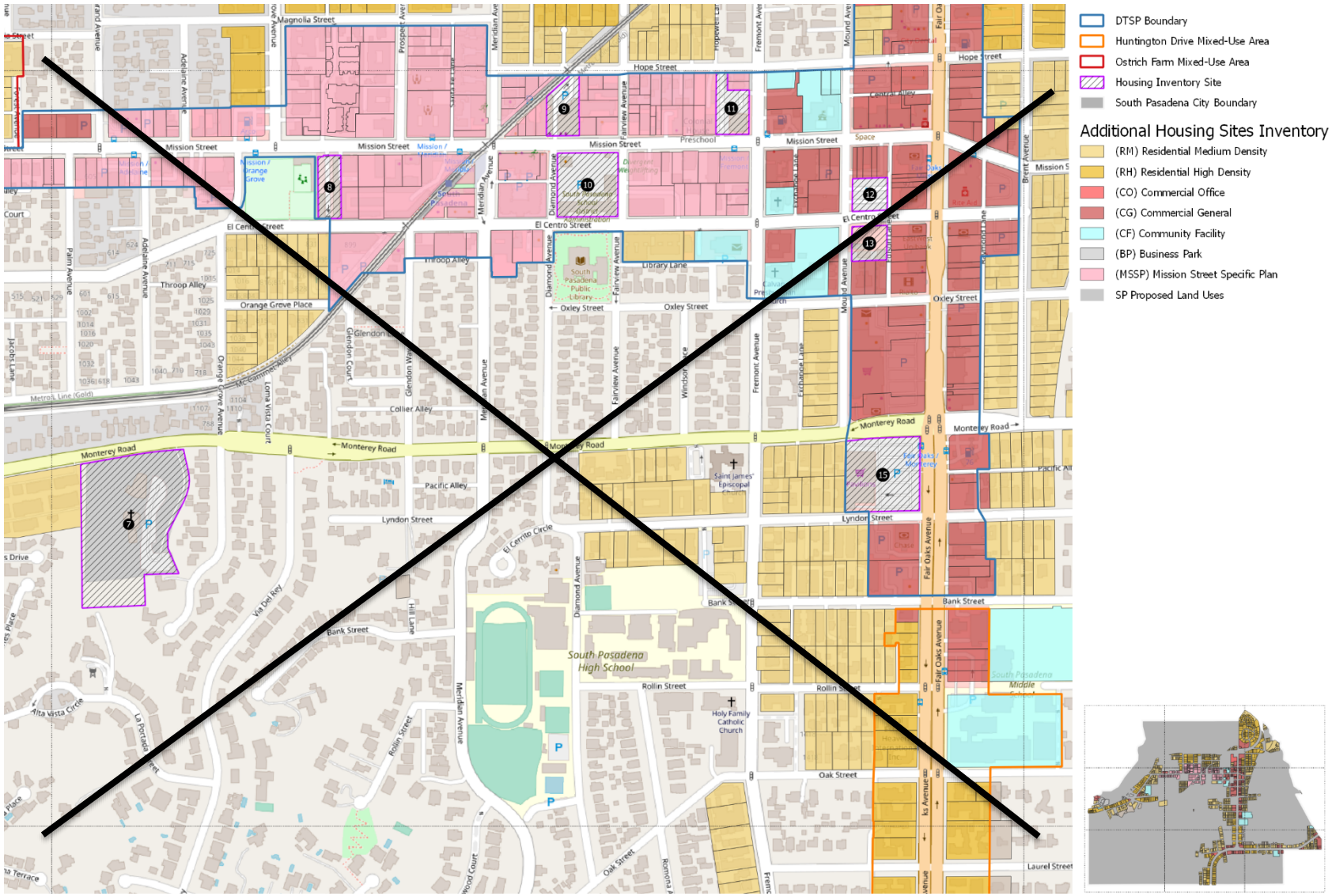
~~Figure A-3.b Map of Additional Sites to Accommodate Lower Income RHNA~~


DTSP Boundary
Huntington Drive Mixed-Use Area
Ostrich Farm Mixed-Use Area
Housing Inventory Site
South Pasadena City Boundary
Additional Housing Sites Inventory
(RM) Residential Medium Density
(RH) Residential High Density
(CO) Commercial Office
(CG) Commercial General
(CF) Community Facility
(BP) Business Park
(MSSP) Mission Street Specific Plan
SP Proposed Land Uses
Pasadena Avenue
Monterey Road
Mission Street
Fair Oaks Avenue
Meridian Avenue
Arroyo Seco Parkway
York Boulevard
Marmion Way
Arroyo Verdugo Road
Fremont Avenue
Garfield Avenue
Huntington Drive
Mission Road
Orange Grove Boulevard
Glendon Way
Oxley Street
Hope Street
Bonita Drive
Glendale Avenue
Glendale Boulevard
Glenwood Road
Glenoaks Boulevard
Verdugo Avenue
Verdugo Road
Verdugo Boulevard
Verdugo Vista Drive
Verdugo Hills Boulevard
Verdugo Hills Place
Verdugo Hills Court
Verdugo Crest Drive
Verdugo Terrace
Verdugo Canyon Road
Verdugo Park
Verdugo Mountains
Verdugo Peak
Verdugo Wash
Verdugo Basin
Verdugo Ridge
Verdugo Woodlands
Verdugo Hills

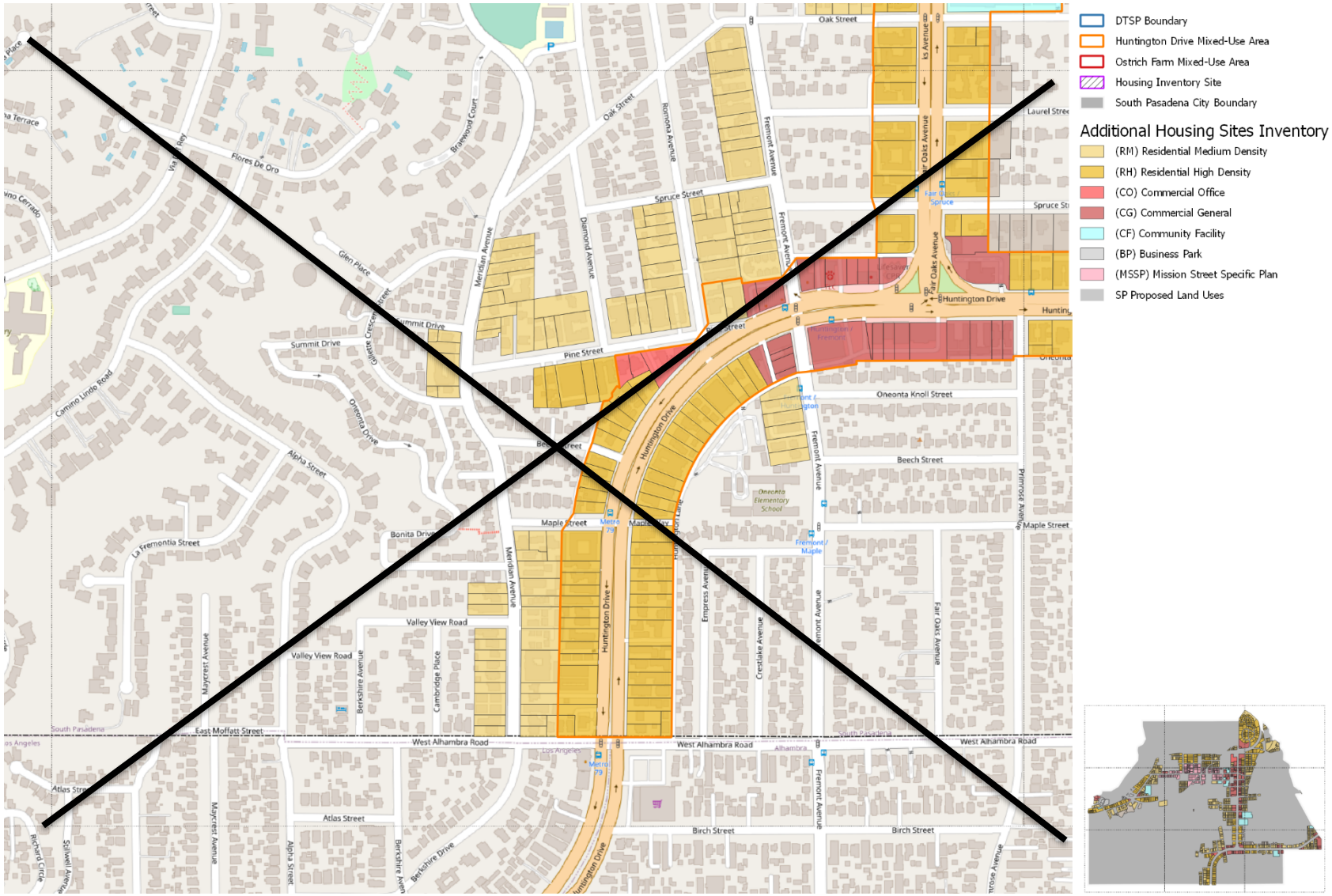
~~Figure A-3.c Map of Additional Sites to Accommodate Lower Income RHNA~~



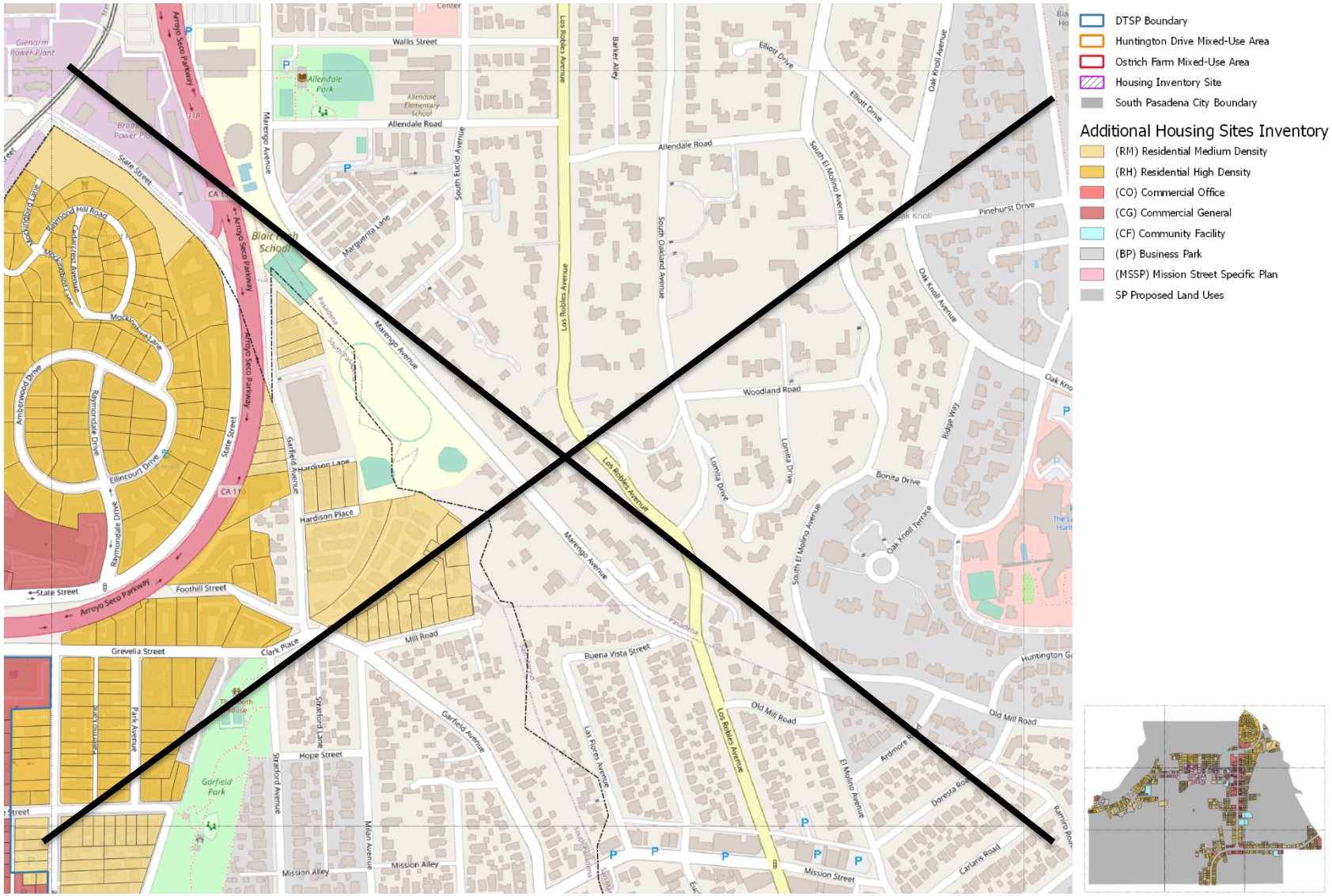
~~**Figure A-3.d Map of Additional Sites to Accommodate Lower Income RHNA**~~



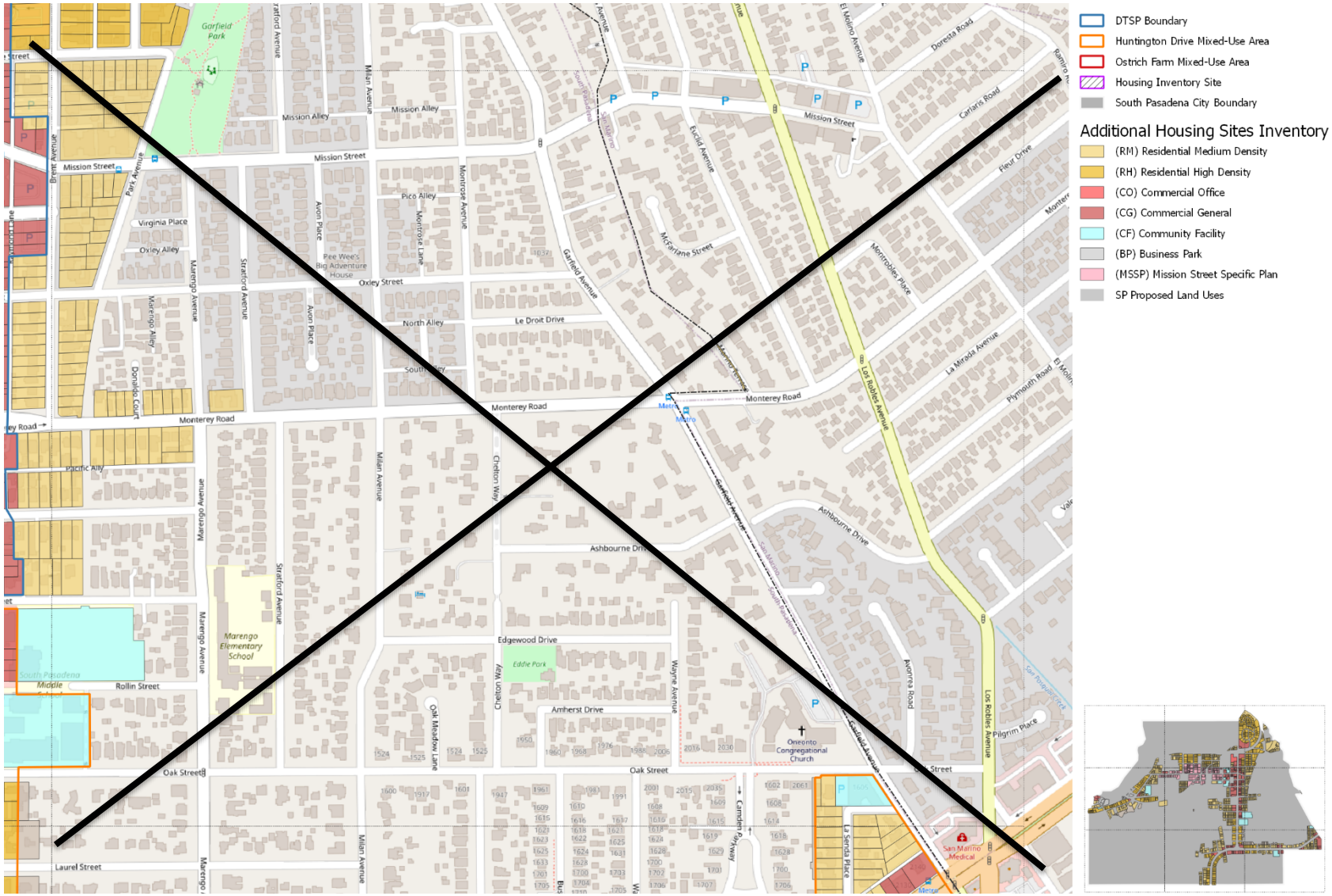
~~**Figure A-3.e Map of Additional Sites to Accommodate Lower Income RHNA**~~



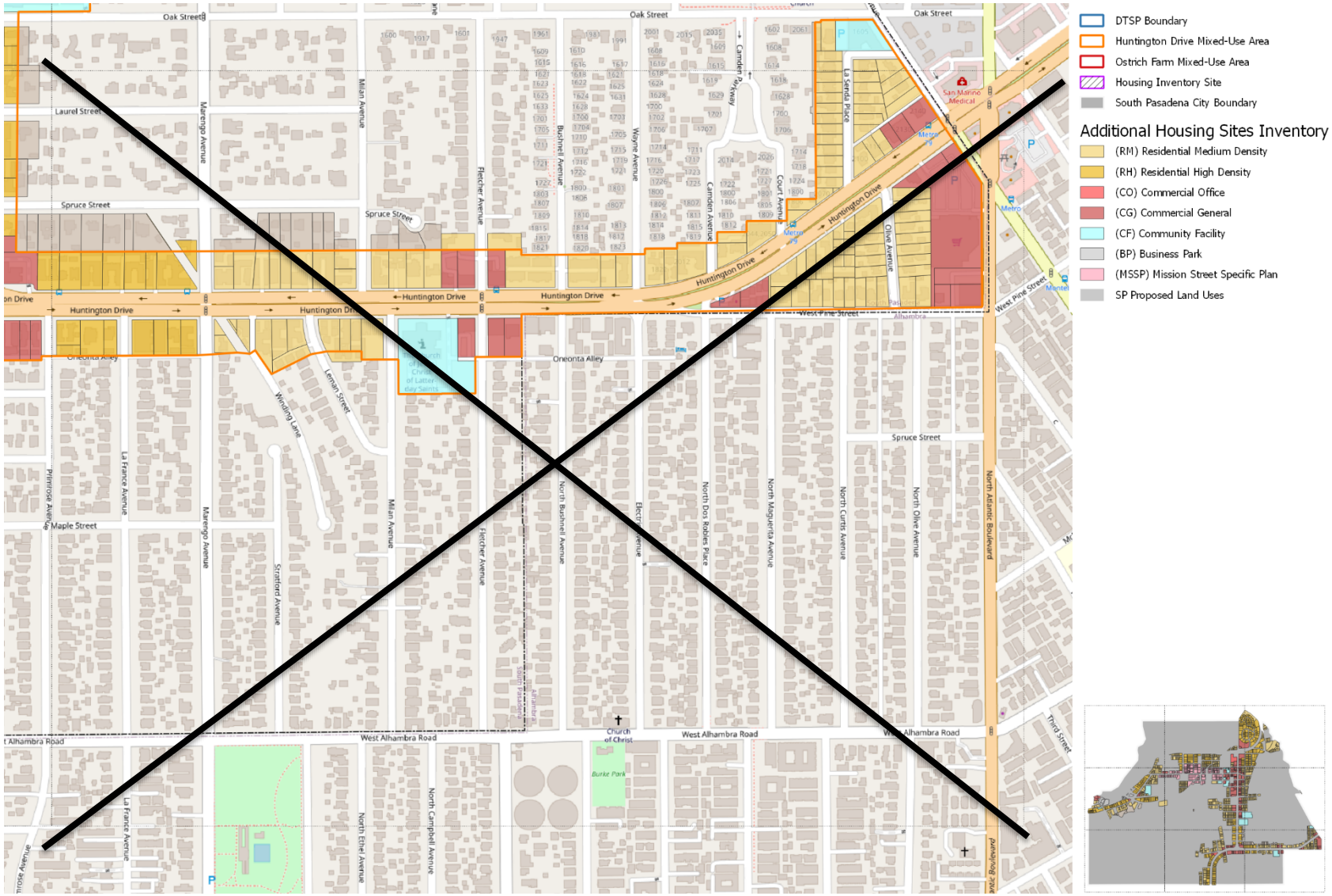
~~Figure A-3.f Map of Additional Sites to Accommodate Lower Income RHNA~~



~~Figure A-3.g Map of Additional Sites to Accommodate Lower Income RHNA~~



~~Figure A-3.h Map of Additional Sites to Accommodate Lower Income RHNA~~


DTSP Boundary
Huntington Drive Mixed-Use Area
Ostrich Farm Mixed-Use Area
Housing Inventory Site
South Pasadena City Boundary
Additional Housing Sites Inventory
(RM) Residential Medium Density
(RH) Residential High Density
(CO) Commercial Office
(CG) Commercial General
(CF) Community Facility
(BP) Business Park
(MSSP) Mission Street Specific Plan
SP Proposed Land Uses
Oak Street
Laurel Street
Spruce Street
Huntington Drive
Maple Street
West Alhambra Road
Oneonta Alley
Milan Avenue
Marengo Avenue
Fletcher Avenue
Bushnell Avenue
Wayne Avenue
Camden Avenue
Court Avenue
Olive Avenue
La Senda Place
Camden Parkway
Lenain Street
Winding Lane
La France Avenue
Primrose Avenue
Stratford Avenue
North Ethel Avenue
North Campbell Avenue
North Bushnell Avenue
Electric Avenue
North Dos Robles Place
North Maguerita Avenue
North Curtis Avenue
North Olive Avenue
North Atlantic Boulevard
West Pine Street
Third Street
Church of Christ
Burke Park
San Marino Medical
Metro

SUITABLE SITES TO ADDRESS THE LOWER-INCOME RHNA ~~OR WITH PENDING OR APPROVED APPLICATIONS~~

1. Vacant Site



This site is vacant.

Parcel Number	5311003096
Site Size (acre)	1.05 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	BP with Mixed-Use Overlay
Proposed General Plan Land Use	Ostrich Farm Mixed Use
Vacant or Non-Vacant	Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	70 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes - Verbal communication between City staff and property owner representative; Property owner representatives requested meeting with City (7/28/21 and 8/9/21 meetings to discuss potential housing proposal).
Environmental Constraints	No known environmental constraints.

2. Business and Research Park parking lot site



Existing use is as a business park with offices and large surface parking areas. The site is underutilized given the large parking lot and proposed density. Bullseye Glass and Judson Studios (southwestern-most buildings) are relatively new tenants, **so not all of the site capacity is assumed.**

Parcel Number	5311004010
Site Size (acre)	2.23 acres
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	BP with Mixed-Use Overlay
Proposed General Plan Land Use	Ostrich Farm Mixed Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	50 lower-, 20 moderate-, 13 above moderate-income units= 83 total units
Property Owner or Developer Interest in Residential Development?	Staff held a phone call with the property owner to discuss the General Plan update, which would upzone the property to accommodate more housing units. The property owner was interested in future development based on the potential residential density that was discussed.Property owner was supportive of rezoning for potential for multi-family residential development in the planning period. Developer interest in site.
Environmental Constraints	No known environmental constraints.

3. Monterey Road site



Underutilized parcels each with one single-family home on it. All three parcels have the same owner. Owner is interested in the development of housing and has submitted an application for a total of 8 market-rate units on the three parcels.

No longer a suitable housing site. See pipeline site on parcel 5311010076 for correct information.

Parcel Numbers	5311015035, 5311010001, 5311010002
Site Size (acre)	5311015035 – 0.34 acres, 5311010001 - 0.33 acres, 5311010002 – 0.59 acres = 1.26 acres total
Current General Plan Land Use	Medium-Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RM
Proposed General Plan Land Use	Medium-Density Residential
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	8 above moderate-income units
Property Owner or Developer Interest in Residential Development?	Yes, both Property Owner and Developer Interest. Property owner has submitted an application for residential development.
Environmental Constraints	Rear portion of the site is significantly sloped.

4. Tyco site



Existing uses include parking lots and underutilized industrial buildings. All parcels have the same owner. Owner is interested in consolidating the parcels and developing a few hundred units of high-density housing on the site.

Parcel Numbers	5313011007, 5313011009, 5313011010, 5313011012, 5313011013
Site Size (acre)	5313011007 – 0.89 acres, 5313011009 – 0.34 acres, 5313011010 – 0.24 acres, 5313011012 – 1.00 acres, 5313011013 – 0.80 acres =3.26 acres total
Current General Plan Land Use	Business Park/Research & Development
Current Zoning	BP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	BP with Mixed-Use Overlay
Proposed General Plan Land Use	Ostrich Farm Mixed-Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	70 du/ac.
Realistic/Net Units	130 lower-, 57 moderate-, 30 above moderate-income units = 217 total units
Property Owner or Developer Interest in Residential Development?	Yes. Staff held a phone call with the property owner to discuss the General Plan update, which would upzone the property to accommodate more housing units. The property owner was interested in future development based on the potential residential density that was discussed. Owner/Developer interested in building over 300 units during the planning period.
Environmental Constraints	No known environmental constraints.

5. Liquor store site



Existing use is liquor store. Underutilized site with surface parking and proposed density. The structure is 50-60 years old. There have been no planning/building permits applied for or issued for this site over the past ten years, indicating that there have been no major investments in the structure.

The proposed density is 60 du/ac, which is below the maximum density permitted of 70 du/ac. This decision was made due to the site's unique shape. Currently, improvements on the site include an approximately 5,500 square foot retail building, and approximately 10,000 square feet of parking that includes 17 parking spaces. As shown below, the site can accommodate 31 housing units. The proposed Ostrich Farm Mixed-Use zoning will allow for up to 8,500 square feet of retail development in additional to the residential development shown. It is anticipated that redevelopment of the site to residential mixed-use will significantly increase the site's value over the existing use.

A question about this site was presented to developers during the City's developer forum, where the participants identified this site as "moderately likely" to be redeveloped. The judgement of the likelihood of redevelopment was made in comparison to other sites presented to the developer forum, all of which were in the Downtown Specific Plan area, and based on the shape of the site.

Parcel Number	5311012019
Site Size (acre)	0.55 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	BP with Mixed-Use Overlay
Proposed General Plan Land Use	Ostrich Farm Mixed-Use
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	60 du/ac.
Realistic/Net Units	19 lower-, 8 moderate-, 4 above moderate-income units = 31 total units
Property Owner or Developer Interest in Residential Development?	No response from the property owner. No expressed interest from any developers.
Environmental Constraints	No known environmental constraints.

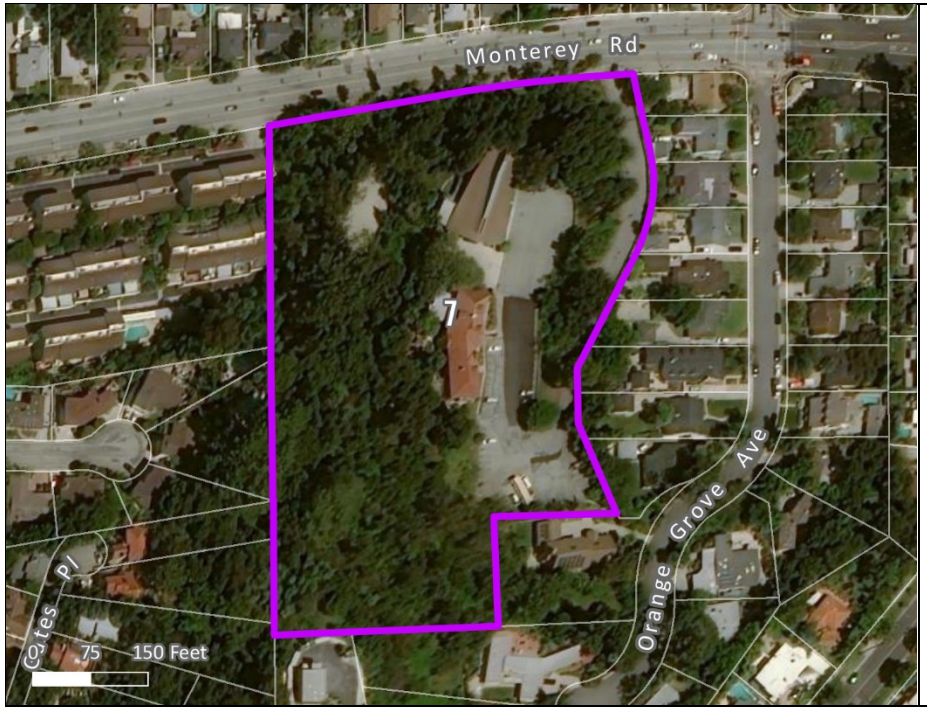
6. Arroyo Vista Inn site



Existing use is a bed & breakfast inn. Owners are interested in affordable housing development on the portions of the site close to Monterey Road, retaining the existing buildings. Close to transit and amenities. The site was recently subdivided into three parcels. The housing potential is on the right-hand parcel and only on the street-facing third of the parcel. The owner has submitted an application for residential units on this parcel.

Parcel Number	5311012040
Site Size (acre)	5311012040 – 0.78 acres
Current General Plan Land Use	Medium Density Residential
Current Zoning	RM
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	RM
Proposed General Plan Land Use	Medium Density Neighborhood
Vacant or Non-Vacant	Vacant portion of site
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	7 above moderate-income units
Property Owner or Developer Interest in Residential Development?	Yes. Letter and Meetings with Property Owners for Housing Development during the planning period
Environmental Constraints	Rear portion of the site is significantly sloped.

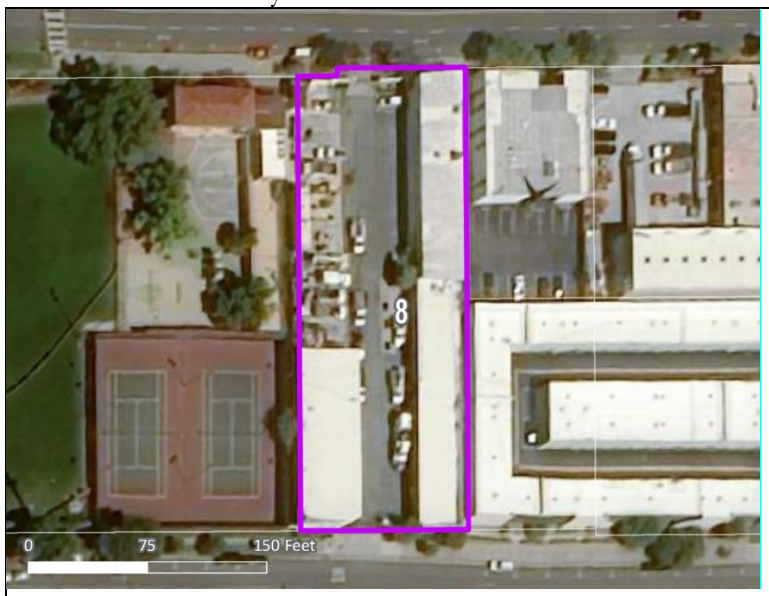
7. Methodist Church site



Existing use is church buildings, parking lot, and open space/undeveloped area. The church that owns the property has been studying different scenarios for developing the site further to incorporate housing, including affordable housing units. The existing church building and historic community room building and parking lot would be retained along with some areas of slopes, but other areas of the site are underutilized and could easily accommodate housing development. Without these constraints, the site could accommodate 100 units. However, based on the constraints of the site, including the topography, historic resources, and intention of the property owner, it is anticipated that the site will reasonably accommodate 30 lower income units.

Parcel Number	5314003083
Site Size (acre)	6.65 acres
Current General Plan Land Use	Community Facilities
Current Zoning	CF
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	CF with residential allowance
Proposed General Plan Land Use	Civic
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	30 du/ac.
Realistic/Net Units	30 lower-income units
Property Owner or Developer Interest in Residential Development?	Yes. Meetings with property representatives and architects in response to their interest in developing 30 housing units during the planning period.
Environmental Constraints	Site has significant topography and the property owner intends to keep the existing uses.

8. Public works yard site



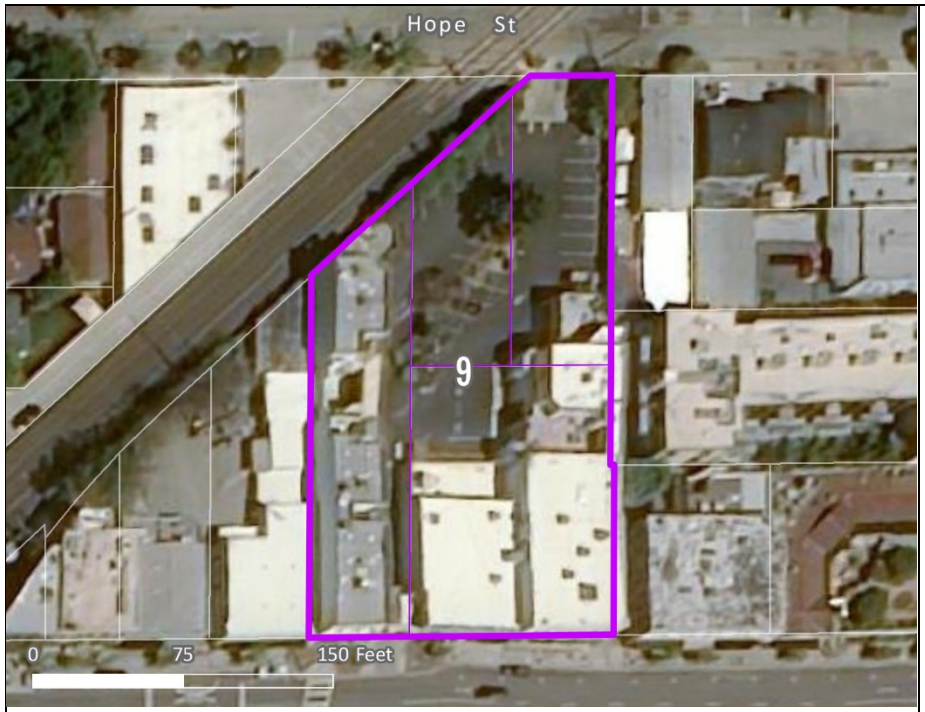
This property is owned by the City. Existing use is the City public works yard, with three distinct uses on site: offices, material storage, and vehicular storage. The City commits to relocating these uses during the planning period. The office uses will relocate to City Hall, the material storage uses will relocate and be combined with existing material storage located adjacent to the South Pasadena Dog Park on Stoney Drive, and the Public Works Department will purchase or lease a secured warehouse building for vehicular storage in South Pasadena or a neighboring community.

This site is centrally located near transit and services. Once vacated, the City will make this site available for a 100% affordable housing development. This property is included in Program 2.1 for developing City-owned sites with affordable housing.

The site includes an underground gasoline tank and filling station on site that will be removed prior to redevelopment of the site. As part of the redevelopment, an environmental site assessment will be conducted to determine if any environmental remediation is required. However, there is currently no indication that remediation will be required. The underground gas tank is inspected regularly and no leaks have been detected. Any necessary remediation identified in the environmental site assessment will be conducted by the City prior to redevelopment of the site. It is not anticipated that the testing or remidation of the site, if required, will present significant constraint on redevelopment of the site, as this type of testing and remediation is common on many previously developed parcels. Site with soil contamination are generally remediated through the excavation and export of contaminated soil during the grading process.

Parcel Number	5315020901
Site Size (acre)	0.71 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	~~Mission Street~~**DTSP – Mixed-Use Core**
Proposed General Plan Land Use	~~Downtown Mission~~**Mixed-Use Core**
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	~~Maximum density~~ 70 du/ac. ~~Minimum density 60 du/ac.~~
Realistic/Net Units	47 lower- -income units = 47 total units
Property Owner or Developer Interest in Residential Development?	Yes, City-owned and replacement yard options identified.
Environmental Constraints	The site contains an existing gasoline filling station and underground storage tank. Potental soil contamination may impact timeframe and cost of redevelopment.

9. Meridian site



Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services. The property owner's plan to redevelop will be made more feasible by the proposed programs in this housing element, the DTSP, and height increases based on the density bonus and/or changes to the height maximum initiative.

Parcel Numbers	5315014030, 5315014032, 5315014033, 5315014044
Site Size (acre)	5315014030 – 0.23 acres, 5315014032 – 0.16 acres, 5315014033 – 0.13 acres, 5315014044 – 0.31 acres= 0.83 acres total
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	~~Mission Street (adjacent to the track)~~**DTSP – Mixed-Use Core (50 du/ac & 70 du/ac)**
Proposed General Plan Land Use	~~Housing Opportunity Site~~**Mixed-Use Core**
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac & 70 du/ac.
Realistic/Net Units	26 lower-, 12 moderate-, 6 above moderate-income units = 44 total units
Property Owner or Developer Interest in Residential Development?	Yes. Meeting and site visit with owner representative and City staff
Environmental Constraints	No known environmental constraints.

10. School District site



The property contains a historic school district building, but the majority of the property is a surface parking lot. This site is identified in the current adopted South Pasadena Housing Element. In 2021, the South Pasadena Unified School District sold the property to a developer. The current property owner has proposed a mixed-use project that includes retail, 89 market rate residential units, 19 moderate-income residential units, and adaptive reuse of the historic school administration building for commercial uses. The developer submitted the project in September 2021 and it received final approval from the Planning Commission on September 13, 2022. The units assigned to this site are based on the approved application. This site is centrally located near transit, schools and services.

No longer a suitable housing site. See pipeline site on parcel 5315008047 ~~5311010076~~ for correct information.

Parcel Number	5315008047
Site Size (acre)	1.90 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	19 moderate-income and 89 above moderate-income units = 108 total units
Property Owner or Developer Interest in Residential Development?	Yes, application received and approved.
Environmental Constraints	No known environmental constraints.

11. Carrow's site



Existing use is Carrow's restaurant with surface parking. An application for a mixed-use project, utilizing the State Density Bonus, with 50 units (5 affordable units) and 3,769 square feet of commercial area was submitted on February 8, 2021 and approved by Planning Commission on April 18, 2022. The application was submitted prior to the effective date of the inclusionary housing ordinance, and as such was not subject to its provisions.

No longer a suitable housing site. See pipeline site on parcel 5315009051 ~~5311010076~~ for correct information.

Parcel Number	5315009051
Site Size (acre)	0.81 acres
Current General Plan Land Use	Mission Street Specific Plan
Current Zoning	MSSP
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Mission Street
Proposed General Plan Land Use	Downtown Mission
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	50 du/ac.
Realistic/Net Units	5 lower- and 45 above moderate-income units = 50 total units
Property Owner or Developer Interest in Residential Development?	Yes. Application under review; unit count based on current application
Environmental Constraints	No known environmental constraints.

12. El Centro St. and Edison Ln. Site



Existing use is a moderately used parking lot. The west parcel of the two parcels is owned by the City. Parking would be underground if the site is developed for housing. When developed, the project would need to provide at least 3 commercial spaces for the bank east of this site. The entire site is identified in the current adopted South Pasadena Housing Element. This site is centrally located near transit and services.

Parcel Numbers	5315003044, 5315003901
Site Size (acre)	5315003044 – 0.37 acres and 5315003901 – 0.19 acres= 0.56 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	~~Mixed-Use~~**DTSP – Fair Oaks Corridor**
Proposed General Plan Land Use	~~Downtown Fair Oaks~~**Fair Oaks Corridor**
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	90~~60~~ du/ac.
Realistic/Net Units	25~~0~~ lower-, 12~~8~~ moderate-, 10 above moderate-income units = 47~~3~~~~2~~ total units
Property Owner or Developer Interest in Residential Development?	The smaller, west parcel is City-owned. Although no response was received from the property owner of the east parcel, the City will continue efforts to consolidate the parcels to develop a housing project.
Environmental Constraints	No known environmental constraints.

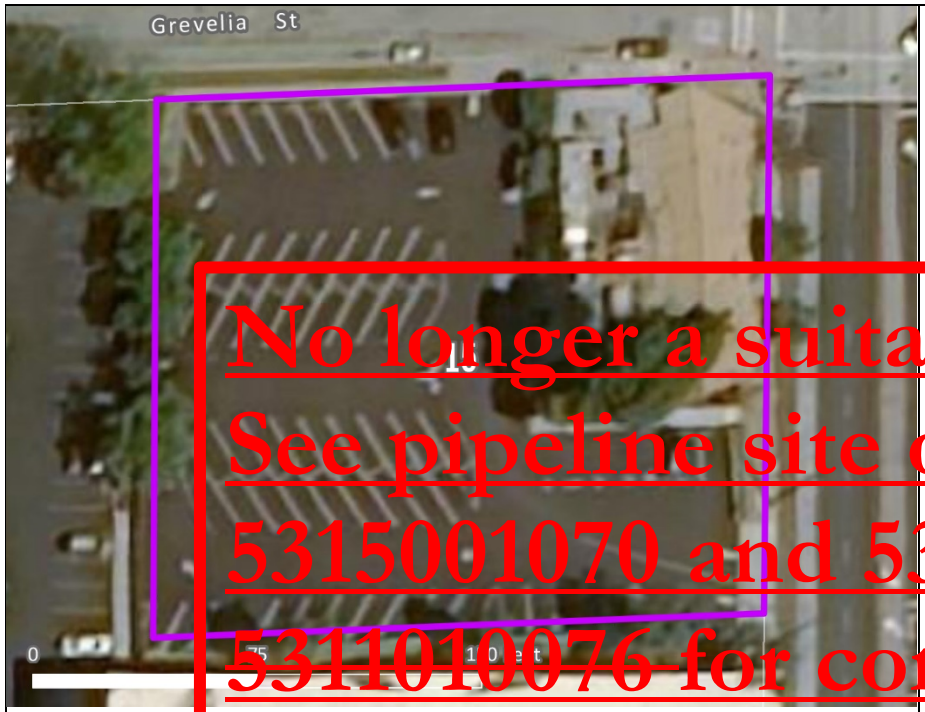
13. City-Owned Parking Lot site



Existing use on the three northern parcels is a parking lot and a small theatre building. The City has a short-term lease in place with the theater becaue the goal is to develop a 100% affordalbe housing development on this site. The lease was amended in 2022 so that it is a month-to-month lease that expires on March 31, 2024. These lease amendments were made to allow the City to redevelop the site into residential uses. Those three parcels are owned by the City. There has been recurring interest from developers over the years for senior affordable housing development. The fourth parcel at the south end of the site could be consolidated with the other three parcels to develop as one site. There is one single-family residence on the existing site. It is not occupied by a lower-income household. The owners are interested in their property redeveloping together with the City-owned parcels as multifamily affordable units. The City plans to issue an RFP for development of housing on this site.

Parcel Numbers	5315003903, 5315003904, 5315003902, 5315003035
Site Size (acre)	5315003903 – 0.18 acres, 5315003904 – 0.12 acres , 5315003902 – 0.12 acres, 5315003035 – 0.19 acres = 0.61 acres total
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	~~Mixed Use~~**DTSP – Fair Oaks Corridor**
Proposed General Plan Land Use	~~Downtown Fair Oaks~~**Fair Oaks Corridor**
Vacant or Non-Vacant	1 parcel Vacant, 2 parcels Non-Vacant
Density or Proposed Density (units per acre)	~~9~~60 du/ac.
Realistic/Net Units	~~49~~36 lower-income units ~~= 36 total units~~
Property Owner or Developer Interest in Residential Development?	Yes, Three parcels are city-owned and the owners of the fourth parcel are interested in their parcels being consolidated with the city parcels and all four parcels redeveloping together for multifamily residential development during the planning period.
Environmental Constraints	No known environmental constraints.

14. Shaker's site



Existing use is a small restaurant, Shaker's, with substantial surface parking. This is a strong site for redevelopment for housing, and could incorporate the existing or a replacement restaurant and possibly other ground floor commercial uses. Staff has held multiple meetings with the property owner and property owner's representative, who are very interested in developing the site with a high-density housing/mixed-use project. Redevelopment of the site will require a Historic Resources Evaluation (HRE) report for demolition. This site is centrally located near transit and services.

No longer a suitable housing site. See pipeline site on parcels 5315001070 and 5315001072 5311010076 for correct information.

Parcel Number	5315001070
Site Size (acre)	0.85 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	Fair Oaks
Proposed General Plan Land Use	Downtown Fair Oaks
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	110 du/ac.
Realistic/Net Units	46 lower-, 23 moderate-, 23 above moderate-income units = 92 total units
Property Owner or Developer Interest in Residential Development?	Yes. Owner representatives have met several times with City staff.
Environmental Constraints	No known environmental constraints.

15. Pavilions parking lot site



Existing use is a supermarket (Pavilions) with a large surface parking lot with the commercial use set back from the street. Although recently remodeled to update the store, the owner has informed the City that they are also developing a proposal to redevelop the property with underground parking, a new market and high density housing on upper levels at the maximum that would be allowed by City zoning, and would include affordable housing units. The recent renovations are minor in nature and would not preclude redevelopment of the site. The project would be similar to others that the owner has implemented in other locations throughout the state.

A site study was conducted on this site confirming the site can fit 220 housing units in addition to a grocery store in the development, within the 90 dwelling units per acre density maximum. ~~Unit assumptions for this site assumed 75 percent of maximum development capacity as a mixed-use development that would include the grocery store use as well as housing.~~ This site is centrally located near transit and services and schools.

In a February 2022 meeting with Community Development staff, the property owners provided a proposed mixed-use project description with high density residential, at the highest capacity allowed by Code using density and height bonuses, and a new market of similar size to the existing. Their continuing interest in a project of this scale was confirmed in a December 2022 letter and was reitterated at the February 1, 2023 City Council meeting during public comments.

Parcel Number	5319002034
Site Size (acre)	2.67 acres
Current General Plan Land Use	General Commercial
Current Zoning	CG
Rezoning or Change to Land Use Required?	Yes
Proposed Zoning	~~Fair Oaks~~**DTSP – Fair Oaks Corridor**
Proposed General Plan Land Use	~~Downtown Fair Oaks~~**Fair Oaks Corridor**
Vacant or Non-Vacant	Non-Vacant
Density or Proposed Density (units per acre)	**90**~~110~~du/ac.
Realistic/Net Units	110 lower-, 55 moderate-, 55 above moderate-income units = 220 total units
Property Owner or Developer Interest in Residential Development?	Property owner interest expressed to City staff in higher density housing redevelopment during the planning period.
Environmental Constraints	No known environmental constraints.

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Appendix B:
Public Participation Summary

Appendix B: Summary of Public Participation

Release of Public Review Draft Housing Element

The Public Review Draft Housing Element was released for public review including posting on the City of South Pasadena's website on October 12, 2021. The City submitted the draft to HCD for their first review On October 22, 2021. Below is a summary of all outreach since initiation of the Housing Element update, all written comments on the Housing Element received by the City, and how comments on the draft were addressed in this revised draft Housing Element. The summaries of outreach and community input are organized by type of outreach or meeting.

Public Workshops

Due to the social distancing requirements enacted by the California Governor's Office of Emergency Services and the County of Los Angeles in response to the COVID-19 pandemic, public workshops were held online to provide a way for residents to engage with the Housing Element Update while not gathering in a single physical location. The City drafted and dispersed online flyers providing notice of these meetings, which contained a link where attendees could request an invitation. The invitations for these public workshops were electronically shared with the Eventbrite platform. The invitation contained a URL link that connected workshop attendees to the virtual meeting space on the Zoom platform.

Workshops 1 and 2

The City held two online public workshops with the general public to solicit feedback from City residents on Saturday, May 30, 2020, at 10 a.m. and Tuesday, June 2, 2020, at 6 p.m. The same workshop was held on the two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about Housing Elements. That survey was available before, during, and after the workshops. In addition, the City set up an email address to receive input ahead of the workshops and throughout the Housing Element Update and encouraged participants to submit comments and questions via email.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with an overview of the 6th-cycle Housing Element Update process, with a question-and-answer period in the middle. The second part of the workshop presentation focused on the requirements for analyzing sites and other approaches suitable to accommodate the City's RHNA. Interaction was conducted via chat and email to minimize inappropriate content or behavior or instances of Zoom "bombing" by uninvited guests. Participants were directed to share their questions either through Zoom's chat feature or to email their questions to the City. The City staff selected questions among those received and answered some of them during the meeting as time allowed. They indicated that all questions would be answered in a frequently asked questions (FAQ) document that they drafted after the meeting's end and was then posted on the City's website.

Public Workshop, May 30, 2020 (Workshop 1)

There were approximately 30 participants at this workshop. Due to technical difficulties with the chat feature for some participants, after the end of the presentation more questions were answered by City staff and the consultant team.

The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: https://www.southpasadenaca.gov/home/showdocument?id=21084

- Participants asked about the RHNA process and how the number was determined for South Pasadena.
- Participants asked about the potential for golf courses, school district lands, and other sites with existing uses to be re-purposed for meeting the City's RHNA.
- Participants asked about Accessory Dwelling Units (ADUs) and their potential for rental units for low-income housing as well as the potential implications of the legalization of AirBnB in the City.
- Participants asked about the impacts of potentially increasing maximum density and height limits to increase housing supply.

Public Workshop, June 2, 2020 (Workshop 2)

There were approximately 30 participants at this workshop. The following is a paraphrased list of questions and comments by topic that were fielded by staff during the meeting. The full FAQ list of comments and questions with responses may be accessed here: ***https://www.southpasadenaca.gov/home/showdocument?id=24141***

- Participants asked about CalTrans-owned properties and how those might be used for new housing.
- Participants asked about the potential lowering of the City's RHNA resulting from the current economic slowdown and future elimination of Metro bus stops in the City.
- Participants asked about the consequences and penalties for a non-compliant housing element.
- Participants asked about the methodology for determining RHNA and how SCAG had arrived at the City's RHNA numbers.
- Participants asked about the City's future ADU guidelines.

Workshops 3 and 4

The City held two online public workshops with the general public to solicit feedback from City residents on Wednesday, September 23, 2020, at 6 p.m. and Saturday, September 26, 2020, at 10 a.m. The same workshop was held on two different days and times to offer multiple opportunities to participate. The format and presentation for both workshops was the same. Those who RSVPed were invited to participate in a short online survey about what should be discussed at the workshops. That survey was available before and during the workshops and was closed after the workshops. In addition, the City continued to accept emails to receive input ahead of the workshops.

The public workshops were noticed and the flyer advertising the workshops was posted on the City's website.

The format for the workshops was a webinar-style presentation with a brief overview of the 6th Cycle Housing Element Update process and the strategies under consideration to address the City's RHNA. Meeting participants were then separated into virtual breakout rooms to discuss questions about RHNA strategies. The groups were small, at around five people, and each had staff or consultant facilitators. Polling questions were asked of participants soon after the beginning of the workshop, after the presentation right before the breakout groups, and then the same questions were asked again just after the breakout group segment to gauge whether opinions changed based on the breakout group discussions. The polling questions were:

First poll after slide 4 – second team meeting rolls slide

- Did you participate in the Housing Element Workshops 1 or 2?
- If not, have you watched presentations the City has posted on their website about the Housing Element?

Second poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

Third poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs)
    - Upzoning single-family areas
    - Increasing density without increasing height
    - Increasing height and density

The discussion questions for the breakout groups were:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

3. Are there certain areas of the city where increasing housing strategies should be concentrated?

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena, either because of the size, style, mix of uses, features, degree of affordability, etc.?

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

The workshops concluded after the breakout room discussion.

Public Workshop, September 23, 2020 (Workshop 3)

There were approximately 12 participants at this workshop. The participants represented members of City commissions, City Council members, housing advocates, community members, those who work in South Pasadena, and both renters and homeowners. The results of the two substantive poll questions for Workshop 3 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs) – 20%
    - Upzoning single-family areas – 30%
    - Increasing density without increasing height – 0%
    - **Increasing height and density – 50%**

Poll after breakout groups and report-backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
    - Programs to support anticipated accessory dwelling units (ADUs) – 11%
    - Upzoning single-family areas – 22%
    - Increasing density without increasing height – 11%
    - **Increasing height and density – 56%**

There were two breakout groups at Workshop 3. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?
    - Sees a lot of obstacles for housing and would like the City to think outside of the box
    - Knows many of the legislators that wrote the laws, wants to make sure the City makes decisions that would provide the best housing
    - Wants to make sure the City avoids liability with HCD and advocacy groups
    - Wants to hear what fellow residents thought about the different proposals and what is important for the future
    - Would like to see broad community support coming together to get behind this element.
    - Wants to make sure housing is built for everyone in the San Gabriel Valley
    - Wants to make sure RHNA gets distributed to affirmatively affirm fair housing and avoids concentrations of poverty
    - Would like to see increased density and sustainable landscapes
    - Concerned about big RHNA increase that the City has to absorb. Important to preserve small town character and single-family neighborhoods as we add housing
    - A lot of people want to live here, want to make it possible for a variety of people to live here. Likes idea of increased height limits and greater densities

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- Higher-density/height can provide more affordable/lower-income housing without looking like Downtown Los Angeles
- Two-thirds of ADUs can be deemed affordable
- Believes the City needs to upzone and increase densities and will need more ideas for low-income housing
- Should go beyond the targeted zoning for the six areas mentioned
- City will run into issues with the no-net-loss rule
- Does not believe HCD will give the City the minimum number of ADUs that is calculated
- Least favorite is upzoning single-family housing
- Would like to see more analysis that increased density/height is needed. Believes the City will face some difficulty with providing sufficient proof for specific parcels
- Frustrated with the City's ability to provide low-income housing since there is no redevelopment or assistance from the State, believes the only tool available is inclusionary housing
- It's hard to imagine the proposal for upzoning single-family would be accepted by most residents, interested in what kind of implications will happen from the Housing Element in different portions of the City
- ADUs could be problematic as long-term housing, especially for families. Shouldn't be the primary solution
- Higher densities could allow a blending of housing affordable to lower- and higher-income brackets
- Not opposed to ADUs, concerned with affordability levels
- Concerned about reliance on ADUs
- More potential for ADUs as a solution than other options
- ADUs are a wonderful idea. City should allow ADUs to be legalized/acknowledged without penalty
- Asked about Caltrans properties. City let the questioner know that they have not heard back from Caltrans regarding a potential partnership. City is interested in working with Caltrans to rehabilitate the Caltrans properties. Can't easily count those towards to RHNA because they are not new units.
- Desires choices for all affordability levels
- Increase in height and density sounds nice. Interested in understanding more about how to distribute height and density so as not to limit affordability options to confined areas
- Concerned about waiving or lowering parking requirements and traffic from ADUs
- Be careful with parking issues
- Important to consider reasons behind voter-imposed height limit
- Preserve small-town character

3. Are there certain areas of the city where increasing housing strategies should be concentrated?
    - To reduce GHG emissions, housing should be concentrated around High-Quality Transit Area (Gold Line Station)

- Should be as close to the Gold Line Station as possible, should eliminate parking requirements in those locations
- Along transit corridors (Huntington/Fair Oaks/Gold Line)
- Near the Gold Line is preferred; however, it is a historic district
- Vons center is a prime location
- Definitely near transit, there will be some capacity issues with the historic character, commercial corridors
- At least half of participants agreed housing should be dispersed through many areas of the City

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Monrovia/Azusa examples, options are diverse in terms of affordability
    - Smaller buildings on Raymond Street (south of Colorado) at Fair Oaks/Mission, need good design guidelines
    - Encinitas, higher-density project example (May 20th presentation to City Council)
    - Hiring great architects, variety of designs that are respectful of the context
    - The mix of densities by the middle school. There is a tradition of a mix of densities in South Pasadena.
    - Historic Ostrich Farm building in South Pasadena
    - President Apartments at 669 South Union in Los Angeles. It is a six-floor apartment building with 105 units.
    - We have a good mix all over town. Multifamily units are well integrated. Fit with diversity of architectural styles appropriate for each neighborhood
    - Mission Meridian in South Pasadena. It is a traditional mix with landscaping, setbacks, and quality materials. It did a good job of reflecting the historic character while also providing relatively dense housing and a range of bedrooms.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

    - As close to the Gold Line as possible, parking reformed
    - Proactive code enforcement, rental housing
    - Inclusionary Housing Policy
    - Sustainability
    - Affordability was mentioned by several people
    - Inclusive of income groups/families
    - Ability to be here in the long haul
    - More permanent supportive housing
    - Population-specific housing
    - Encourage long-term tenants and homeowners, mix of kinds of housing and affordability

- Community, sustainability, and infrastructure adapting to climate change

The following question was brought up during the breakout groups:

- Has South Pasadena explored tax increment financing in lieu of disassembly of redevelopment?

Public Workshop, September 26, 2020 (Workshop 4)

There were approximately 15 participants at this workshop. The participants represented members of City commissions, housing advocates, community members, students, those who work in South Pasadena, and included renters and homeowners. The results of the two substantive poll questions for Workshop 4 were as follows:

Poll after presentation before breakout groups

- Pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 15%
  - Upzoning single-family areas – 31%
  - Increasing density without increasing height – 15%
  - **Increasing height and density – 38%**

Poll after breakout groups and report backs

- Now that you've have a chance to discuss the strategies and hear about others' thoughts, pick a favorite strategy of the four strategies presented during Part 3 of the presentation:
  - Programs to support anticipated accessory dwelling units (ADUs) – 0%
  - **Upzoning single-family areas – 43%**
  - Increasing density without increasing height – 14%
  - **Increasing height and density – 43%**

There were three breakout groups at Workshop 4. Here is a summary of their feedback on the discussion questions:

1. Why are you attending the workshop and what is your biggest priority for the Housing Element?
   - Has followed the state laws and wants to make sure the City builds good looking beneficial housing
   - Not against raising the height in certain area (Ostrich Farms)
   - Housing should relate to the existing character and add value to the City
   - Believes affordable housing should be done first
   - Wants to hear what the community wants in terms of meeting our RHNA goals
   - Wants development of Caltrans properties according to the character of the community
   - Interested in seeing more housing in the area, different types of housing suitable for families
   - Would like a housing element that will sustain growth that the City can accommodate reasonably
   - Concerned about impacts on schools
   - Favors some minor height improvements in key areas

- Need more flexibility for low-income housing design
- Inclusionary housing regulations
- Affordable housing
- Address density and height within zoning (increase)
- Wants priority city process to follow HCD guidelines
- Prioritize geographic equitable distribution of units
- Prioritize housing dispersed equitably not just in concentrated areas.

2. Was there a strategy that could be useful for providing lower-income housing that was described in the presentation that stood out to you – either as a good idea or not a good idea?

- No. The City would have to work with an outside partner (regional). There is no incentive for developers to provide affordable housing.
- None of the above, none of the options presented were good. Need to build more and increase density. Concerns about traffic around Ralphs and Vons sites.
- Most residents favor height and density modifications in certain areas but not all over town. City-owned property on Mound/El Centro could be a good candidate for low-income mixed-use housing, three to four stories.
- Look at adaptive re-use/micro-apartments. Need to work with the state to get credit for these types of developments.
- Upzone throughout the City (single-family areas). Would provide more opportunities. Focus on specific parcels for more density and height.
- A few people said all of the above.
- Reduce parking.
- Increase density without increasing the height, and work with developers to not create boxy projects. Can do a lot with density without height, allow up to five stories perhaps? City doesn't allow smaller product because of density.
- Adaptive re-use is counted by HCD for RHNA.
- 80 percent development assumption is not likely.
- Eliminating parking minimums in the Mission/Meridian zone.
- Downtown does not need more parking to claim more affordable units.
- The more we look at density, upzoning single-family lots, and increasing height will make a difference for planning for versus the actual building of housing. Should keep in mind.
- Inclusionary zoning. Could achieve a large amount through inclusionary housing.
- A few people liked the height and density increase strategy and had these additional comments:
    - One worried about ballot measure actually passing.
    - Likes the Andalucia precedent project.
    - Concern about sites at the periphery, need transit-oriented development.
- Upzoning single-family would be good for disbursement of housing in City. So, favor single-family upzoning but may be a stretch.
- Closer to transit (rail).

- A few people were skeptical about aggressive ADU numbers. Some had additional comments:
    - Doesn't understand how that works for renters.
    - Hard to monitor.

3. Are there certain areas of the City where increasing housing strategies should be concentrated?

    - Throughout the City but look for specific areas around transit, commercial areas, neighborhood amenities.
    - Concentrate around transit stop, walkable places, Downtown, Fair Oaks, Mission District. Opportunity by Ostrich Farm can be created.
    - Mound/Oxley is close to amenities and would encourage walkability/public transit.
    - Huntington Drive has pockets that could accommodate increased density, paratransit would be needed to support development in other areas.
    - All of the above - Downtown, Mission west of the subway stop, Mission should allow four stories.
    - Mission west does not want to mess with the historic downtown. There is not a lot of transit ridership. Has been a decrease in ridership.
    - If throughout City, not blanket, culture may not support it.
    - City/PlaceWorks has done a good job of identifying areas but there are some additional/other areas: Huntington Drive is underutilized (four cities connect). Currently, medical offices and low rise that is underutilized. Also look at Ostrich Farm, Mission, and Fair Oaks.
    - First priority is near Gold Line station. Incalculable asset that we are not realizing potential of.
    - Meridian mixed-use is good. Exciting possibility for mixed-use and density in that corridor.
    - Disbursement throughout City but with contextually different housing types. More near transit and services (Gold Line). Well served everywhere already, so can add housing anywhere.
    - Prefer to see more housing near transit hubs (Mission/Fair Oaks and metro station).
    - Near transit and where practical; consider vacant lots.
    - Downtown could accommodate a lot; Fair Oaks has a lot of opportunity for mixed-use; should be spread to some of the existing multifamily areas - triplex/four-plex.
    - Shouldn't only be in 3-5 targeted areas of the city. Look at single-family residential neighborhoods also. Allow higher densities on first two-three properties off main corridors.

4. Can you think of examples of housing buildings in South Pasadena or other cities that would be good in South Pasadena either because of the size, style, mix of uses, features, degree of affordability, etc.?

    - Different style in different places, Mission should look like it was built 150 years ago.
    - Different styles are appropriate, design review process is important, micro-apartments is something that should be considered in some areas, should not limit ourselves to a specific style/type.

- Townhomes at Hope and Meridian is a good example, design standards that are not automobile oriented, cars are moved to the back, less curb-cuts, design and size should prioritize three bedrooms or more to accommodate families.
- Mission/Meridian townhomes, variety of styles, bungalow to Spanish, does not want generic developments, need to have a sense of place, or reflects the historic character.
- Needs to represent South Pasadena, Adobe style, historic examples, character needs to be similar to the unique neighborhoods.
- Respect the historic fabric of the neighborhood block, be flexible given the context of the neighborhood, save the front historic design and modifications are located in the back, concerned about affordable housing
- Generally, multifamily - Look at occupants, tenants (end users) as they transition over lifespan. Professionals, families, seniors; look at different users. Density/massing/open space/courtyards great but also can limit development so we need to look closer as implications of those constraints. It can be too restrictive. Need to dive into more and see specific examples.
- Dense, walkable courtyard multifamily buildings already exist in South Pasadena. See Bank Street (10 units of housing in communal setting possible because without onerous parking requirements). Would love to see that happen again. Currently, the City parking requirements do not allow such projects to be built. Would like to see requirements change to bring back those types of projects and diversity of housing types.
- Sierra Vista Apartments on Esperanza Avenue (low-income senior, 1-2 bed), example of dense affordable complex with beautiful exterior - Yosemite lodge style. Blends well with single-family and multifamily on block. It is only 45 units, so maybe higher density to get more units.
- Likes Andalucia example, doesn't like Aliso example.
- Mission Meridian.

5. Other than the technical approaches to meet the RHNA, what other housing goals and objectives are important to you?

- Design standards are set in stone, we can make sure it looks good.
- That infrastructure/community services are able to support the new housing units.
- Specifically, how we address affordable housing. One concern of ADU plan is that her work as an architect has shown that ADUs are just additional single-family for real estate but does not meet the goal of affordable units. Not just adding units, but how can we assure they are affordable units? Multifamily development also needed to meet minimum they need to make their projects pencil out. Make it more viable and provide more assurance. Don't skim the surface. Financing for developing affordable units is needed, mentioned Pasadena as an example. Can City partner with bank or banks for affordable housing?
- Housing Element sets values to production. Wants to see recognition of race-based exclusionary practices. Contemporary recognition and repair of redlining and other racist practices. Altos de Monterey in the 1960s was the only place to allow non-white residents. Would like to see acknowledgement of past and commit to real policies that are equitable.
- In addition to being affordable, have permanent supportive housing.
- Reduce parking requirements near transit stops.

- Tenant protections.

The following questions were brought up during the breakout groups:

- Do all units count the same toward the RHNA requirement? For example, is a one-bedroom apartment treated the same as a three-bedroom dwelling?
- Could 710/Caltrans money be used for more transit?
- RHNA appeal, what are our chances to lower our numbers?

Workshop 5

Public Workshop, October 21, 2021 (Workshop 5)

The City held a hybrid public workshops after release of the public draft Housing Element on Thursday, October 21, at 6:30 pm. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the workshop was to provide an overview of the 2021-2029 Public Review Draft Housing Element. After the presentation, the public was invited to ask questions and share comments. The meeting had approximately 12 participants, including two in-person and others on Zoom. Four participants spoke. The following summarizes these questions, comments and staff responses:

- The first question asked for clarification about AB 1398 regarding the possibility for getting the Housing Element approved by HCD by the February 11th deadline in order to avoid the mandatory timeframe for rezoning. The City clarified that before AB 1398 was approved, the February 11th deadline was for the adoption of the Housing Element by the City Council. However, with the change in law, adopting the Housing Element by the February 11th date is no longer a requirement to stay on the 8-year housing cycle. The law says in order to avoid a deadline to complete the rezoning within one year of October 15, 2021, the City would need to have adopted their Housing Element and submitted the adopted Housing Element to HCD for a 90-day review and receive certification at the end of that review before February 11, 2022. That new timeline is not feasible because the City is at the initial point of submitting the Draft Housing Element for the first 60-day review by HCD and will not have enough time to adopt and submit the final to HCD by February 11, 2022. Consequently, the City will adopt after February 11, 2022 and be required to complete the rezoning before October 15, 2022.
- The next question asked was in reference to whether Junior Accessory Dwelling Units (ADUs) were included as part of the site inventory in order to meet the City's RHNA. The City answered that both ADUs and JDUs will be counted.
- The third question asked how the City plans to incorporate the 6th, 7th and 8th (future) Regional Housing Need Allocations (RHNA) if the General Plan update is a 25-year plan with the follow-up question about the City's approach for meeting the RHNA from the 1st - 5th Housing Element updates. The City answered that through the 8-year timeframes for updating the Housing Element, the City will attempt to show that the City has the capacity to build the units during the projection period while keeping in mind that the City's capacity to develop these units is in line with the longer-term General Plan. The Housing Element is on a different timeframe from the General Plan and will be updated again in 2030. Furthermore, staff clarified that the Program Environmental Impact Report (PEIR) will be covering the Housing Element, General Plan Update and Downtown Specific Plan (DTSP). Thus, the City will use the General Plan and the PEIR as guide when analyzing appropriate sites for the next housing element update. To answer the follow-up question, staff explained that the City was able to address capacity for the 63 RHNA units in the 5th Housing Element with existing zoning.

- The next question was in regard to the sites inventory. A property owner wanted to confirm that his property was included in the sites inventory as he is interested in developing housing. PlaceWorks confirmed and directed the speaker to find the site in the document. The property was identified as Site #4 and is shown in Table VI-46 and Appendix A. The speaker also wanted to know where the City was in terms of timeline for revising the General Plan. City staff answered that there is a draft of the General Plan Update from 2019, but that it had been put on hold during much of the Housing Element Update preparation in order to integrate consistent programs and policies that align with the Housing Element. Staff stated that the revised draft of the General Plan will be released for public review shortly.

The last comment was about the importance of the City undertaking companion capacity planning for infrastructure including schools, water, wastewater, parking, etc. The commenter noted that the community has been requesting this type of analysis for two years. He would be more comfortable with the plan for housing presented in the draft if that infrastructure analysis was completed.

Workshop 6

Developer Forum August 15, 2022 (Workshop 6)

There were 8 community members, including two Planning Commissioners in attendance at the City's Developer Forum on August 15, 2022. The City provided a brief presentation that included a status update of the draft Housing Element and the draft General Plan and asked for input on several topics related to development in the City and received the following responses.

Questions #1: Please provide input on development standards, processes, and procedures

- A local developer recently had issues with the open space standards and the landscaping requirements for multi-family/high density projects. They felt these requirements could constrain a project and the City should consider reducing the amount of open space/landscaping requirements and allow for roof top landscaping. Program 3.n Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- A local developer that had done several hillside developments in 2017 was required to remove trees to do the project. This required several trips to the Natural Resources Committee which delayed the project. There were requests to build the units around the trees and bring back to the Committee which added more time and cost to the project. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- Another participant spoke about the entitlement process and specific issues with parking requirements. They found it was difficult to meet the density bonus requirement for parking reductions and stated that based on her experience South Pasadena has enough public parking available to meet local demands and the City should consider parking reductions. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review. The City is also considering a single parking requirement in the downtown that could reflect the transit-oriented nature and to require bike parking. **Program 3.b** - Mixed-Use Developments and Adaptive Re-Use Specific actions proposed to facilitate mixed use development in the Downtown Specific Plan include engaging the development community and property owners to promote shared parking and consider reducing on-site parking requirements

on shopping streets to leverage transit access and to incentivize potential office and multi-family residential mixed-use development.

- This participant also said that the current height limit of 45 ft is very challenging and was aware that it could get waived with a state density bonus, but the process takes too long. They recommended that the height limit be increased to 55 or 65 feet in specific areas along Mission Street, Fair Oaks, Huntington Dr., and Monterey Road. **Program 2.n** Citywide Height Limit Ballot Initiative will require the City to place a measure on the ballot in a local election to increase allowed heights above the current citywide limit of 45 feet.
- Another participant suggested the open space/landscaping requirements need to be more flexible because when you have to provide open court yards and private open space you have to increase the height of projects because of requirements. They felt that the Open Space requirements (within downtown area) need more flexibility. **Program 3.n** Zoning Changes requires the City to review the development standards and processes including height limits, open space standards, parking requirements including variances and findings for design review.
- A local developer suggested that the entitlement process he experienced allowed him to work with a planner in between Planning Commission reviews to help move the project along. He encouraged making that an option for the future.
- There was on suggestion that the City should implement an electronic permit system. **Program 3.e** required the City to develop an electronic permitting system for Planning and Building permits, and other relevant permit functions to increase efficiency in processing residential and other permits and to provide accurate data to monitor housing production and other development.
- One comments from a developer was that the City doesn't have enough planner to handle the volume of projects that are coming in for application and the City should consider bringing on additional contract planners to assist with project application reviews. The Community Development Department also recognizes the concern shared by the developers and has staffed up to deal with the project demands and are now more able to take on the new case load.

Question #2: Input on Inclusionary Housing Ordinance

- A develop who has built housing in South Pasadena said that in his experience the inclusionary housing threshold of three units is too low of a requirement. He wanted to do a 4-unit project but it was too costly with the inclusionary housing requirement. The three-unit requirement encourages developers to do bigger units so they don't have to pay the inclusionary housing fee. **Program 2.m** the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints including the unit threshold, the In-lieu fees and cost of a comparable unit and how the inclusionary regulations relate to state Density Bonus law.

Question # 3: Input on likelihood of development of sites in key areas

- All attendees participated in a polling regarding the likelihood of development. The five shared sites were rated by most as either somewhat likely or highly likely to develop. The two most likely to develop were the Pavillions site and Shakers sites.
- Proposed Ostrich Farm Site 5 (Liquor Store)
  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.

- Proposed Downtown Specific Plan Site 10 (Near Mission Meridian)
  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
  - Comments on site: The diagonal edges on Site 10 is problematic for parking. The odd shape makes it hard to design the parking layout and fit in the required number of spaces. Recommendation was to reduce the parking requirement.
- Proposed Downtown Specific Plan Site 14 (City-Owned Parking Lot and Single-Family Residence)
  - Voted somewhat likely to be developed with mixed-use or residential-only develop by the developer panel.
- Proposed Downtown Specific Plan Site 16 (Shaker's site)
  - Voted highly likely to be developed for mixed-use or residential only develop by the developer panel.
  - Comments: Allowing for higher height limit would be helpful on this site since it's near transit (near the Freeway).
- Proposed Downtown Specific Plan Site 21 (Pavillions)
  - Voted highly likely to be developed with mixed-use or residential-only develop by the developer panel.

Workshop 7 & 8

Community Outreach at SP Farmers' Market, August 18, 2022 (Workshop 7)

On Thursday, August 18, 2022, the Community Development Department set up a booth in the South Pasadena Farmers' Market from 4:00 to 8:00 pm to discuss the Housing Element. The late afternoon/evening market attracts hundreds of residents and many local employees and is a casual atmosphere for sharing ideas. Over the four-hour duration of the Market, Community Development staff discussed various aspects of the housing element with visitors to the booth, including: the sites inventory; ADUs; the regional housing crisis; the need for rezoning and mixed-use development and where it would be located; and reconsideration of the voter-approved height maximum through a new ballot initiative within the next two years. Those who stopped by expressed appreciation for the opportunity to talk to City staff about the issues.

Specific comments from community members that stopped by the booth included:

- Support for taking time for the community outreach on the height limit ballot measure
- Support for more housing and getting away from the exclusionary past of the City.
- Property owners in support of the housing overlay that will allow more housing on their property
- Support for modular ADUs and for pre-approved standard plans that residents could utilize (in line with Program 3.f in the draft HE)
- Opposition to any height limit cap revision and to more density
- Support for more height for residential only

- Support for allowing higher and denser development in Downtown near the L Line station, provided the architecture and design meet City standards.

Community Forum and Informational Workshop, August 20, 2022 (Workshop 8)

The City held a hybrid public workshop on Saturday, August 20, 2022, from 10:00 to 11:30 am. Participants had the choice to attend in person at City Hall or to attend virtually. The purpose of the forum was to provide a brief overview of the Housing Element process; provide an update to the community on the status of addressing HCD's comments to the second draft of the Housing Element; and to solicit feedback from the community on the draft document and proposed programs. After a brief overview of the housing element process, the presentation focused on the bigger issues that needed to be addressed in the Housing Element, including the site analysis, development constraints including the height limitations, and Affirmatively Furthering Fair Housing.

After the presentation, the public was invited to ask questions and share comments. The meeting had approximately sixteen participants, including nine in-person and seven on Zoom. Thirteen participants spoke. The following summarizes these questions, comments and staff responses:

- Resident asked if there was a density that HCD would assume that anything over a certain density would be affordable.
  - City staff responded that there is a minimum density that sites need to be able to meet in order for the site to be suitable for affordable housing.

- Resident, who self-identified as former city planning director, stated that the existing General Plan maximum density of 24 du/ac is "ridiculously low." The maximum density could be raised to 36 du/ac without increasing the city-wide height limit. Supports removing the height limit in the proposed Downtown Specific Plan area.
  - City staff thanked the former planning director for his comments.

- Since sites less than half an acre aren't suitable for affordable housing, and a lot of the identified sites have been removed, it's not clear which sites the City is proposing to increase the density on to make up for the shortfall in units.
  - City staff explained that the City is taking two simultaneous paths to meet the City's housing needs. One path is to identify specific sites that the City expects will be redeveloped into housing during the planning cycle. The second path is to increase the allowable density in a large area of the city, focused on the proposed Downtown Specific Plan area, where some percentage of the sites throughout the entire area will be redeveloped without identifying which specific sites those will be.

- Could the City provide an overview of the terms of the stipulated judgement resolving the existing housing element lawsuit against the city?
  - The City Attorney provided an overview of the terms of the judgement: the City must submit a revised draft of the Housing Element to HCD no later than September 15, 2022; the City must initiate a ballot initiative to remove or revise the City's height limit, and if it fails do a mid-cycle review and update of the Housing Element to meet the City's housing needs under the existing height limit; until the Housing Element is adopted, the City will not object to Housing Accountability Act projects that are proposed; and a requirement to prepare more detail regarding the applicability of the identified sites in the site inventory.

- Where in the hierarchy of land use laws does the voter approved height limit fall?
  - City staff responded that a voter approved initiative supersedes both the General Plan and Zoning Ordinance of the city, and that if they conflict the voter approved initiative prevails. However, if the voter approved initiative is in conflict with State law, then the State law supersedes the voter approved initiative. Since South Pasadena's height limit does not directly contradict State law, and because there are alternative ways for the City to meet its requirements under State law that do not require the repeal of the height limit, it's the opinion of the City that State law cannot supersede the City's height limit.

- ADUs have been very popular in South Pasadena, what assumptions does HCD make regarding the affordability of ADUs.
  - City staff responded that the City must base its projection of the permitting of future ADUs on the number of ADUs permitted in past years, and that the City has to document rent on ADUs to take credit for the affordability of those new units in its annual report to HCD.

- Concerned about increasing the height in the downtown area, can the City look at increasing the density of areas outside of the downtown area instead of increasing the height. Also concerned about mixing condos and multi-unit developments in the single-family residential areas.
  - City staff responded that raising the density and height in the downtown area would allow for the necessary growth while preserving most of the city's existing neighborhoods. There is a choice the City and community needs to make about where these new units are going to go, and the direction most members of the community have provided is to increase the density in the downtown area since it's close to transit and walkable.

- What is the proposed new height limit?
  - City staff responded that currently there is not a specific height that the City is aiming for, but instead that the height needs to be tall enough to allow for the density anticipated by the Housing Element given the other development constraints imposed by the City's zoning. Furthermore, this is a question that the community will need to help answer, and is part of why the City is holding this community meeting and will be holding future community meetings on the topic.

- Can the City take credit for the affordability of ADUs that have been built previously, or only those built during the planning period?
  - City staff responded that the City can only take credit for the affordability of ADUs built during the planning period.

- On the General Plan and Mission Street Specific Plan committee during the 1990s, the goal was to downzone the city to reduce the projected population from over 60,000 as proposed in the previous General Plan from the 1960s to something more "reasonable." The City should be working to fight its RHNA allocation because accommodating that many new units will ruin the city as a small town. With the proposed changes, the added traffic will make the main thoroughfares of the city impassable.
  - City staff responded that the goal is to provide the community options for how to accommodate the city's housing needs.

- The City needs to do more public outreach, including making hard copies of the Housing Element and other planning documents available in hard copy at the public library, and to include visual aids in the documents that illustrate the different densities that are being proposed.
  - City staff responded that the City is doing outreach, such as this meeting, and that visual aids are included in the Housing Element to illustrate the proposed densities. Hard copies of the drafts have been available at City Hall and the Library, and as future drafts are released, they will also be made available in hard copy at these locations.

- Has the City looked at the Arroyo Seco Golf Course as a suitable housing site for affordable housing?
  - City staff responded that converting the golf course into homes is an option, but one that is not politically popular and therefore not proposed as part of the Housing Element at this time.

- What are the medium- and high-density residential densities in the draft General Plan?
  - City staff responded that the draft General Plan has not been finalized yet, but that it is expected that a public review draft will be available by the end of September.

- What are some creative solutions and options for meeting the housing needs other than building new units, such as converting existing family-owned apartments to low-income units?
  - City staff responded that the City cannot count existing units to meet its RHNA needs. Most of the time, existing family-owned apartments are the least expensive housing options in a community, so by converting those into deed-restricted Affordable Housing, it eliminates naturally occurring affordable housing and does not create any additional housing opportunities for the community.

- Concerned about the sustainability of the continuation of building new homes.
  - City staff responded that the solutions to our climate crisis and the solutions to our housing crisis are the same: building more housing near transit and building walkable, transit served communities.

- City has an ordinance that puts a constraint on demolishing buildings that are more than 45 years old.
  - The City does have a historic preservation ordinance that may require structures 45 years or older not identified as a cultural resource to obtain a Certificate of Appropriateness for demolition or alteration from the Cultural Heritage Commission (CHC). However, it is important to note that these projects taken to the CHC for demolition have not been denied since the ordinance was adopted. Therefore, the ordinance does not appear to be a constraint.

- What are the consequences of the City being out of compliance of the Housing Element Law?
  - The City Attorney responded that a lawsuit can be brought against the City where a judge could remove the City's land use authority and/or impose fines. The City was sued, and has a stipulated judgement that requires the city to take certain actions, described above, but does not remove the City's land use authority or impose punitive fines on the City. Additionally, the State Attorney General can sue the City and impose fines on the City, but since South Pasadena is working towards completing its Housing Element it is not expected

that the Attorney General will sue the City and instead will focus on cities that are not working towards adopting a compliant housing element.

- Have we looked at other cities that have certified housing elements to see how they meet their housing needs?
  - City staff responded that the City is looking at the certified housing elements, but that many cities have significantly different conditions that make it easier to achieve a compliant housing element.

Workshop 9

Community Outreach at the Social Services and Social Justice Forum

A ninth workshop was held on November 9, 2022 in conjunction with the City's First Annual Social Services and Social Justice Forum. City staff and the City's Housing Element consultant were on hand to discuss the Housing Element with members of the public and service agencies present for the Social Justice Forum

Ballot Measure SP Implementation Town Hall, June 12, 2024

On Wednesday, June 12, 2024, City staff hosted a town hall discussing the City's Housing Element and a potential upcoming ballot measure regarding increasing height limits in the City.

Ballot Measure SP Implementation Open House, July 25, 2024

The City hosted an Open House for the community on Thursday, July 25, 2024 about Measure SP. This Open House featured mini charrette-style dialogue regarding areas where higher density development was anticipated. City staff provided large scale maps and photo simulations to collect feedback from the public.

Measure SP Implementation Community Listening Sessions, January 2025

Following the passage of Measure SP the City undertook a comprehensive public outreach process to discuss and decide upon new height districts for the following areas: Downtown, Huntington Drive, Fair Oaks Avenue, and Ostrich Farm. Additionally, outreach was conducted regarding potential updates to development standards which may limit the development of housing. On January 14 and 23, 2025 the City hosted two community listening sessions. These listening sessions included a small informational portion, educating attendees on the current status of the Measure SP implementation and other relevant updates from the Community Development Department. Additionally, these community listening sessions gave residents an opportunity to ask questions and leave comments regarding the Housing Element and Measure SP. Where applicable, City staff was able to answer questions and provide clarification to residents' inquiries.

Measure SP Implementation Walking Tours, February 2025

On February 1, 2025 the City hosted a walking tour in the Downtown (Mission Street) and Fair Oaks areas. During this walking tour the City shared local examples of higher density and heights, visited new multifamily and mixed use developments in the City, visited the sites of proposed/approved housing developments, and visited sites included in the Housing Element.

City staff and stakeholders discussed appropriate densities and heights in different areas as well as development standards that make higher heights and densities possible and palatable.

The City hosted a second walking tour on February 15, 2025 of the Ostrich Farm and Huntington Drive areas. This walking tour covered the same topics as the first walking tour, just in the context of Ostrich Farm and Huntington Drive. Both walking tours were well attended by approximately 40 stakeholders each tour, including members of Planning Commission and City Council. Valuable feedback was collected during these walking tours and incorporated into later open houses.

Measure SP Implementation First Open House (Proposed Height and Density Standards), February 2025

On February 18, 2025 the City hosted an open house on the proposed height and density standards for housing. The open house featured large scale boards providing an introduction to the Housing Element and Measure SP implementation process, a map of the proposed zoning and density changes, examples of height studies conducted on development scenarios in the Huntington Drive, Ostrich Farm, Fair Oaks, and Mission Street areas, and a board asking stakeholders to weigh in on their priorities as they related to higher density and height. This open house was attended by approximately 40 stakeholders who were able to weigh in on each board utilizing post-its, dots, and pins. The City analyzed the results of these boards and conversations and incorporated these findings into future work.

Measure SP Implementation Second Open House, March 2025

The City hosted a second open house on March 18, 2025 featured a presentation, polling session, and Q&A session regarding current development standards that might limit the development of housing. The development standards addressed in this open house included setbacks, stepbacks, building breaks, parking standards, open space, and minimum unit sizes. During the polling session the City asked eight questions related to their preferences when it comes to development standard amendments. The City is using this feedback to shape the development standard amendments to bring to Planning Commission for consideration.

The eight poll questions and the results of these questions are included below.

Question 1: City SHOULD modestly reduce setback requirements to allow for MORE buildable area.

Yes (9 votes) No (2 votes) Need More Information (6 votes)

Question 2: City should NOT require a front stepbacks if they employ other methods to articulate the façade.

Yes (9 votes) No (4 votes) Need More Information (2 votes)

Question 3: City SHOULD allow podium parking on primary frontage to decrease need for subterranean parking.

Yes (4 votes) No (12 votes) Need More Information (3 votes)

Question 4: City SHOULD focus building break requirements on primary frontages and view corridors.

Yes (15 votes) No (1 vote) Need More Information (3 votes)

Question 5: City SHOULD allow building breaks to occur above the podium level to enhance feasibility.

Yes (14 votes) No (0 votes) Need More Information (4 votes)

Question 6: City SHOULD reduce open space requirements on Huntington and Ostrich Farm to reduce heights and improve feasibility.

Yes (7 votes) No (5 votes) Need More Information (6 votes)

Question 7: City SHOULD reduce minimum dimensions for courtyards in Downtown Specific Plan to reduce heights and improve feasibility.

Yes (5 votes) No (6 votes) Need More Information (8 votes)

Question 8: City SHOULD reduce minimum unit sizes in Huntington Drive and Ostrich Farm to allow more affordable units.

Yes (10 votes) No (2 votes) Need More Information (6 votes)

Planning Commission Community Meeting (Recommendations on Density, Height, Development Standards), June 2025

On June 16th, 2025, when the Planning Commission identified their favored density, height, and development standards recommendations, the Planning Commission and City hosted a final community meeting on the 16th. This community meeting consisted of a 10 minute introduction from Planning Commission, a 30 minute presentation by the City's consultant on the recommendations, and an hour for community members to circulate around several boards to learn about, ask questions about, and give comment on the Planning Commission's recommendations. Questions and comments from the public were collected by writing on flip charts, post-its, and the boards themselves.

Surveys

The City conducted public outreach via two online community surveys. Each of the surveys was launched prior to public workshops for the Housing Element Update.

Survey 1 – May - September 2020

The first survey was made available on the City's website in May 2020 and was open until September 2020 to allow for a long time period for input to be provided due to the impacts of the COVID-19 pandemic. The link to the survey was also sent to everyone who registered for Workshops 1 and 2. The main purpose of the survey was to gauge participants' experience with Housing Elements and the General Plan and to find out a little bit about their perspective on housing issues. A total of 33 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about housing and the General Plan Housing Element. This survey should take about 2 minutes.

1. *Are you:*
    a. *Renter in South Pasadena*
    b. *Property owner in South Pasadena*
    c. *Other*

2. *Have you heard of the Housing Element of the General Plan?*
   YES or NO
3. *Have you heard of the regional housing needs assessment or RHNA numbers?*
   YES or NO
4. *Please rank the following issues in order of importance to you.*
   a. *Production of additional housing stock*
   b. *Preservation of existing housing stock*
   c. *Creation of economically sustainable neighborhoods*
   d. *Providing a diverse cost range of housing opportunities*
5. *Has housing affordability impacted you or your family personally?*
   YES or NO
6. *Have you participated in the City's General Plan Update process?*
   YES or NO

The following summarizes the responses to the survey:

1. Are you a renter, property owner, or other?

   Approximately 60 percent of respondents were property owners, 35 percent were renters, and 3 percent chose other.

2. Have you heard of the Housing Element of the General Plan?

   Three quarters of respondents had heard of the Housing Element, one quarter had not.

3. Have you heard of the regional housing needs assessment or RHNA numbers?

   Approximately 80 percent of respondents had heard of RHNA, 20 percent had not.

4. Please rank the following issues in order of importance to you?

   Respondents ranked the four options in the following order from highest to lowest priority:

   - Providing a diverse cost range of housing opportunities
   - Creation of economically sustainable neighborhoods
   - Preservation of existing housing stock
   - Production of additional housing stock

   It should be noted however that most respondents chose all four options as priorities.

5. Has housing affordability impacted you or your family personally?

   Approximately 55 percent of respondents had been impacted personally in terms of housing affordability, approximately 45 percent had not been impacted.

6. Have you participated in the City's General Plan Update process?

   Approximately 58 percent of respondents had previously participated in the General Plan Update process, approximately 25 percent had not.

Survey 2 – September - October 2020

The second survey was made available on the City's website in September 2020 and was open until October 2020. The link to the survey was also sent to everyone who registered for Workshops 3 and 4. The main purpose of the survey was to identify the housing strategies people would like to learn about and discuss at Workshops 3 and 4. A total of 17 responses were received. The survey text is shown in italics below:

Thank you for taking the time to complete this short survey about how the City of South Pasadena can achieve its Regional Housing Needs Assessment (RHNA) allocation for the 2021 Housing Element Update. This survey should take about 2 minutes.

During the workshops on September 23rd and 26th, 2020 we plan to discuss the following topics that are options for the City to address its RHNA allocation:

- *Effort to Appeal the City's RHNA number*
- *Options to Address the RHNA and Receive a Certified Housing Element*
    a. *Programs and strategies for an aggressive program to produce more affordable Accessory Dwelling Units (ADUs) in South Pasadena*
    b. *Options for zoning changes to increase density (number of housing units allowed on a property)*
        i. *Allowing more ADUs to be built on a single-family property*
        ii. *Allowing multifamily housing buildings to be built in single-family neighborhoods*
        iii. *Allowing housing to be built in areas that do not currently allow residential development*
        iv. *Increasing building heights and densities to allow more housing units to be built in mixed-use areas in town and/or just on specific sites*

1. *Have you participated in the City's previous Housing Element workshops?*
2. *Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?*
3. *Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target? Choose as many as you agree with.*
    a. *Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units*
    b. *Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development*
    c. *Increased density in specific areas of the City*
    d. *Increased height in specific areas of the City*
    e. *Increased density and height in specific areas of the City*
    f. *Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood*
    g. *Other*
4. *What other topics/options would you like to see discussed at these or future workshops?*
5. *What questions do you have about the RHNA or 2021 Housing Element Update?*

The following summarizes the responses to the survey:

1. Have you participated in the City's previous Housing Element workshops?

   41 percent of respondents said yes, 59 percent said no.

2. Do you agree that the City should appeal its RHNA allocation of 2,062 housing units?

   35 percent said yes, 41 percent said no. Three people chose other and wrote in a response. The write-ins included two people who said the appeal won't work, another said don't spend any money on the RHNA appeal, and another said they don't know enough to choose yes or no.

3. Should South Pasadena's RHNA remain unchanged, which of the following options would you support to enable the City to meet this target?

   The number of votes each strategy received is shown below from the strategies that received the largest number of votes to those that received the least votes.

   - Increased density in specific areas of the City – 9 votes
   - Increased density and height in specific areas of the City – 9 votes
   - Upzoning single-family neighborhoods to allow more ADUs, duplexes, or aggregating properties for multifamily development – 8 votes
   - Increased height contingent upon additional design and development standards to ensure scale and character compatible with the neighborhood – 7 votes
   - Aggressive program to incentivize development of affordable accessory dwelling Unit/Secondary Units – 6 votes
   - Increased height in specific areas of the City – 6 votes

   Several write-in strategies were also proposed:

   - Convert any retail and business buildings that become vacant to residential
   - Widescale upzoning of single-family neighborhoods
   - Reuse empty commercial buildings for affordable housing
   - Increased height and density throughout the City.

4. What other topics/options would you like to see discussed at these or future workshops?

   - I would like to know what ways you guys are planning to fit the 2,062 housing units if the height limit is not changed.
   - Use of non-profit developers versus regular developers.
   - The aggressive ADU idea is an attempt to shirk the city's responsibility to build more housing. It will likely not succeed - as the state will not accept it. ADUs have been legal in South Pasadena for 3 years and there has been almost nothing built. There is little the city can do to get more "aggressive" - let alone reach the type of numbers being talked about. The City needs to allow real densities of greater than 30 units to an acre in your multifamily areas. The multifamily I've seen built has such low densities that it encourages only luxury 1,900 square foot condos.

- There is a lot of fear of change in South Pasadena. Can we help people visualize South Pasadena in a future that satisfies RHNA requirements? That might help focus energy on the choice between the options.
- Streamlined permitting process. Progressive ways to address the missing middle housing types.
- I hope to see the elimination of parking requirements to facilitate unit production and a serious discussion about inclusionary zoning.
- Adaptive reuse of commercial buildings for affordable housing.
- At the first Zoom Housing Meeting, numerous sites were presented as potential areas for development. But much of this data was based on a single conversation with the owner of the property who "said they were open to considering development." I found that rather loosey goosey. There were too many "ifs" in that scenario.
- South Pasadena, along with other towns, is bleeding commercial space. What are the options for converting some of these into work/living lofts?
- Finally, all of the development that has been greenlit in the city only offers 13 "affordable units." All development must focus on affordability or we can never come close to meeting the numbers. We know that developers don't make money on building affordable housing, so who will the city partner with to make that happen?
- What about the additional infrastructure that will be needed to support 20 percent more units and a 20 percent increase in population?
- We just came out of a 7-year drought. Where will the extra water supplies come from?
- Multiple studies in the last decade, including at Mission Meridian, have proven that transit based housing is an urban myth. It does not reduce traffic. If this plan goes forward, how will South Pasadena achieve its green Climate Action Plan goals in the coming 10 to 20 years?
- Regarding specific locations within the City to be up zoned – PlaceWorks' previous presentation at the Planning Commission did not address Huntington Drive or any area south of it.
- Even in a city as small as South Pasadena, effects of any changes will be distributed unevenly, which will produce uneven follow-on effects. I live near the Metro station and near the proposed Seven Patios project, which will create a significant traffic impact, especially on Farmer's Market days. How do any of the proposed options take into account the related structural changes that they will create?

5. What questions do you have about the RHNA or 2021 Housing Element Update?

- In what ways are you planning for the moderate and above moderate housing if you don't get the 1,000 ADUs?? What is the current zoning capacity of South Pasadena assuming the 50 units/acre for the Draft DTSP??
- In what ways is the City of South Pasadena critically thinking about progressive development, instead of just appealing the RHNA numbers?
- More information on inclusionary requirements, ADU considerations for RHNA counts, and Caltrans housing considerations for RHNA counts.
- I have some questions as to the accuracy of the predictions since they were determined pre-Covid. There are now more people moving out of the California than moving into the state.

- The increased density adjacent to the Gold Line Station under the pretense that all of these people will take the train to work in Pasadena/Downtown L.A. is a false flag. No one at the Mission Meridian Transit Village takes the Gold Line to commute. The ridership on the trains has steadily declined for three years. The few people I know who used the train to commute to Downtown Los Angeles are now driving as a precaution during Covid-19. The condos at the Mission Meridian Transit Village sold for upwards of $1.1 million in 2005. To be honest, it's highly unlikely that anyone who has paid that amount of money for a home is commuting by train. This was reported in the Los Angeles Times in 2007 and still holds true today. My council member used to ride his bike to take the train, but even he has quit doing that. He affirms that residents living at Mission Meridian are not commuting by train.
- Explain why South Pasadena never responded to the AFFH or LPFS surveys sent out by SCAG in 2018 and due back no later than April 2019. Our city's allocation now includes excess allocation from other cities who responded to the survey and saw their initial allocations reduced.
- When are you going to admit you want our city to look like Glendale, Pasadena, and Alhambra?
- Do we need to vote on these changes to the General Plan or will it be decided by the City? For instance, height increase was considered for the November Ballot, but up zoning wasn't. Who makes the decisions?
- Can we zone for/build more housing to exceed the target?
- What are resources I can consult to learn more about the RHNA process, specifically to understand how South Pasadena's RHNA number compares to that of other communities?

Hearings

City staff and their consultant, PlaceWorks, presented at multiple public hearings at different points in the update process prior to release of the public draft Housing Element.

July 21, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on July 21, 2020. The presentation covered the City's RHNA allocation, sites analysis and options for addressing the identified RHNA shortfall, options for inclusionary housing policy and ADU regulations, and potential options for increased density and height to accommodate additional housing. Information on potential changes to allowed density and height on specific sites was studied and presented. The following questions and input were received from the Planning Commission:

- Provide additional explanation of what moderate and above moderate RHNA means
- Has staff considered studying the Pavilions site?
- One consideration is changing what is allowed in single-family areas versus increasing the height limit in other areas
- Has staff looked at the stables site?
- Should think about a road diet on Monterey Road
- Consider street parking in the ADU regulations
- Could pre-approved ADUs include pre-fabricated units? It seems like they would be more affordable

- Are there precedents and incentives for converting market rate units to affordable units?
- What about the Caltrans properties?
- What about condo version to market rate then to affordable housing?
- Showing partial site redevelopment of Vons and Ralphs sites as the baseline condition with full redevelopment with density and height increases is misleading. If this is the approach needs to be supported more.
- Amount of parking provided for the precedent projects versus what would be required under South Pasadena's regulations?
- Wondering about the illustrative examples show versus the sites/areas a ballot measure to increase height would actually apply to
- Has City had conversations with the owners of all of these sites?
- Can regulations regarding height and zoning be adjusted after the Housing Element is adopted?
- Do Density Bonus units count towards the RHNA?
- Seems weird to have a ballot measure to increase height before the Housing Element.
- Will the RHNA change?
- Seems like the City would be forced to build more small units
- Makes sense to have less parking at the Gold Line Storage sites. Connect with the Downtown Specific Plan and General Plan and do that with all the 5 sites.
- Transit access to each of the 5 sites needs to be looked at
    - Ralphs site should be good, there are multiple bus lines
    - Ostrich farm site – not sure if there is sufficient transit access
- Increased density can add economic benefit/energize the area, just one edge might not make sense
- Premature for a height ballot initiative, the tail is wagging the dog
- Should fight the RHNA
- State Density Bonus – allows increased height
- South Pasadena isn't alone in facing a large RHNA increase
- The Council and the Mayor Pro Tem have personally written to and spoken with SCAG and state legislators and they aren't getting any traction on changing the RHNA
    - Alhambra – 6,000 + unit RHNA
    - San Marina – 398 unit RHNA
    - Beverly Hills – 3,096 unit RHNA
- The area a height increase applied to could be less site specific – a wider area
- More study is needed ahead of a ballot measure on height, leaning towards not recommending
- Supportive of strategic increased heights but thinks we aren't there yet, not enough time to make a decision to have a ballot measure ahead of the deadline for the general election. Not supportive of sending to City Council for November ballot
- Supportive of need to reconsider height limits
- Housing need is critical

- The consideration of height increase needs to be more thoroughly vetted, can't support at this time

Three recorded voicemail comments were received:

- First voicemail comment - SPRIG
  - Need an alternative that accommodates the RHNA within the 45-foot height limit
  - They gathered 67 signatures – don't want height increase
- Second voicemail comment
  - No height increase
  - Concerns about water, sewer, and electricity
- Third voicemail comment
  - Opposed to height-limit increase
  - Confirmed they had also submitted written comment

August 5, 2020

City staff and PlaceWorks presented to the City Council at their meeting on August 5, 2020. The presentation focused on the consideration by the Planning Commission at their July 21st meeting of recommending to the City Council to place a ballot measure to propose allowing increased height on the November ballot. Staff reported that the Planning Commission did not recommend moving forward with the ballot measure at this time. Staff also presented regarding a potential RHNA appeal by the City.

August 11, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on August 11, 2020. New analysis and information was presented about specific sites studied for potential height and density increases, following up on the presentation at the July 21st meeting. Updates included information on transit accessibility of candidate sites, parking ratios for precedent examples, and the addition of one site for consideration for potential height and density increases.

The following questions and input were received from the Planning Commission.

- Regarding Ostrich Farm Area:
  - Why not include parcels to the east of the vacant site?
  - Ostrich Farm area is appropriate, without needing to be as surgical as elsewhere
  - Need to look at how to make Ostrich Farm more of a complete neighborhood
  - Can it connect to Highland Park?

- Regarding Meridian Property:
    - Be careful to recognize historic district
    - Be careful not to overwhelm surrounding historic structures with additional height
    - Agree with sensitivity towards Meridian site
- Comments regarding sites in general:
    - Vons, Ralphs, and Ostrich Farm are good opportunities
    - Generally, site locations seem pretty smart
    - Concern about putting a lot of units in far corner of the city
    - Traffic and parking should be a top consideration
    - Traffic and parking analysis need to go hand in hand with these sites
    - Look at what State density bonus law means when considering additional heights
    - We need to build more housing
    - Presentation materials are going to be key pieces when communicating to residents
    - How much time do we have to make zoning changes outlined in Housing Element?
    - Does a height increase need to be in place at adoption of Housing Element?
    - What is required to prove redevelopment potential of a non-vacant site?
    - Question regarding ADU production target; answered that City will have to include aggressive programs
    - What does it mean if we don't raise heights? (need to explain to the public)
    - Is there a way to raise heights without going to the voters?
    - Can City get credit for units built in excess over prior Housing Element cycle?

September 8, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on September 8, 2020. The focus of the presentation was ADUs and options for supporting that housing type in the City as part of the Housing Element and ongoing City programming. Staff was specifically seeking input on update to the City's ADU zoning regulations and consideration of policies and programs to include in the draft Housing Element.

One recorded voicemail comment was received:

- City talked about ADU projection methodology at the July 21st Planning Commission meeting. Doesn't see that in the presentation this time.

The following questions and input were received from the Planning Commission:

- Will objective design standards be part of the near-term ADU ordinance update?
- Are the projected ADU numbers changing?
- Some ADU updates should be made now and maybe some later – before or after Housing Element adoption. The items to do later would be the more aggressive measures.
- Address parking problem related to ADUs
- Okay with duplex, deed-restriction ADU idea
- All were supportive of amnesty program.
    - One commissioner asked: Why does it need to be limited to non-historic properties?

- Yes, City should streamline planning and building review process
- Yes, supportive of homeowner assistance – guide to ADU development process
- Supports fee reductions for affordable ADUs
- Okay with ADU monitoring, but some concerns about staff time resources
- Okay with education and promotion around ADUs. Supportive of proactive/targeted outreach to certain neighborhoods and areas with larger lots
- Supportive of allowing two detached ADUs as long as there is enough room on the parcel for open space
- Concerned about streamlining impacts on staff workload. Should have as many standard ADU building types as possible. One-stop shop is a good idea.
- If City allowed two detached ADUs on a parcel could they require parking?
- Should include pre-fab ADU units – important for education program
- Should include costs and sources for loans in education and promotion program
    - City of Pasadena is offering two types of loans to encourage ADUs
- Careful who gets included on the list of resources (builders, etc.). Don't want to unfairly support or not support someone.
- Could tie education and promotion to streamlined approval
    - Homeowners could provide case study materials about the process, costs, how it went for them
- Could have objective criteria for which builders/others get included on the resources list

December 15, 2020

City staff and PlaceWorks presented to the Planning Commission at their meeting on December 15, 2020. The presentation focused on additional design and economic analysis PlaceWorks prepared for certain sites to understand what types of housing projects would be feasible and acceptable on those sites and how changes to the City's General Plan and zoning related to density would relate to what is allowed under State Density Bonus law. The additional focused most on the Vons site.

January 26, 2021

City staff and PlaceWorks presented to the Planning Commission at their meeting on January 26, 2021. The meeting focused on the proposed Inclusionary Housing Regulations. Supporting information was presented regarding analysis of height and density on certain sites, following up on earlier meetings, in particular, the December 15, 2020, meeting.

May 26, 2021

City staff and PlaceWorks presented an update on the Housing Element process to the Planning Commission at their meeting on May 26, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the Planning Commission:

- Was the City concerned by HCD's preliminary review of some of the Housing Element sections?
- Asked about thresholds for sites analysis.
- Asked about the overlay described in Table VI-4 and details of the proposed zoning column.

- Mentioned public comment from Josh Albrektson from the previous Planning Commission meeting, not to forget it.
- What happened at the EIR scoping meeting?
- Thinks the City is being too optimistic about the analysis of the sites. Should remove small and steep single-family sites. In general, overly optimistic in all categories including ADUs, vacant and non-vacant sites.
- Multiple commissioners agreed yes, density increases are needed.
- Should ask other cities for ideas of how to meet the RHNA, need some magical solutions.
- Do City-owned sites included in the Housing Element have to be surplus?
- Does not want to include the ballfield or stables as Housing Element sites.
- Can the affordable housing production program be strengthened?
- Generally concur with strategies that were in the preliminary draft programs submitted to HCD.
- Would like another chance to review sites at the time of the public draft.
- Could there be some sort of "pre-permit program" for ADUs as a way to gauge interest in ADUs?
- Would it be possible for the planning commissioners to do a driving tour some of the sites?
- Interested in the church sites strategy.
- Likes the idea of redoing the City Hall site.
- Could the parcels by war memorial building on Fair Oaks possibly be added to the inventory?
- Can existing units be rehabilitated and counted towards the RHNA?
- Multiple commissioners said yes to the affordable housing overlay.
- Don't rule out all historic sites.
- Should increase densities in Ostrich Farm and Downtown.
- Should put increasing the citywide height limit back on the table and continue the community conversation.
- Will minimum densities be put into place?
- Raising height limits on certain properties should be considered.
- Multiple commissioners felt the sites to receive the affordable housing overlay will be competing with state density bonus in terms of incentivizing actual development. The overlay should be calibrated to produce results.
- In favor of affordable housing overlay but not as spot zoning.
- Feels the City doesn't have enough staff capacity to implement all of the proposed Housing Element programs. There is a long wait time for processing applications for ADUs. Need dedicated housing staff.
- Maybe strategy for projecting ADUs can be to project numbers annually – make more specific – year 2, year 3, etc.
- Can the parcel assemblage program work in conjunction with overlay zoning?
- They have done lot consolidation on hillside sites. There was an example of this from the previous Planning Commission meeting.
- Should spend time justifying the ADU projection number.

- Have demolitions of affordable units been an issue in South Pasadena?
- What the EIR is evaluating is a moving target, can't really finish the analysis yet.
- Please post the PowerPoint for this meeting.
- Need to get the word out to the public that the comment period is coming.
- History and context information in the Housing Element will be very helpful.
- There should be more aggressive publicity about the ADU amnesty program.
- Supportive housing for those with disabilities is needed.

October 12, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on October 12, 2021. The meeting focused on the release of the 2021-2029 public review Draft General Plan Housing Element. Public comments included:

- 95% realistic capacity because of density bonus?
- No analysis of inclusionary housing regulations?
- ADU projection numbers are too high

The following summarizes the input and questions from the Planning Commission:

- Which programs are state mandates, which are continuing from previous Housing Element? Please present this at the Oct 21st community workshop.
- Asked for clarification on state requirements regarding Senate Bill 9
- Asked for more context for regarding the level of input sought from the community at this point in the process.
- Need to explain RHNA and why the number is high.
- The Planning Commission requested an informational update at their Nov 9th meeting, including HCD comments if possible.

November 9, 2021

City staff and PlaceWorks presented to the Planning Commission on the Public Review Draft Housing Element at their meeting on November 9, 2021. Four members of the public commented. These comments included:

- The City should have a requirement to hire local skilled workforce – both for reducing environmental/AQ/VMT impacts and for local jobs. The City of Hayward recently put this type of policy/requirement in place.
- Is the City applying for any state funding programs mentioned in the Housing Element programs?
- The ADU projection numbers are wildly optimistic.

The following summarizes the input and questions from the Planning Commission:

- Projected ADUs are only 20% of City's RHNA
- Is more than 50% of lower income RHNA being accommodated on non-vacant sites?

- Are there regional or nearby examples of projects - could any of that analysis or examples be strengthened/added to?
- The majority of the Planning Commission expressed concerns over the public's potential reaction to the rezoning and density changes included in the Draft, as well as the potential confusion about what the City is doing.
- Suggested strengthening the information in the water quality section of the Assessment of Fair Housing
- Asked for clarification about ADU track record information in the draft
- Could a program be added to close the gap between planning approvals and building permits?
- Could a program be added to work with prospective ADU applicants – ombudsman/mentor/technical assistance?
- Staffing and staff retention are critical to implementing the Housing Element programs
- Understand based on analysis presented earlier in the Housing Element project that the densities/units assumed in the HE will lead to bulkier buildings with smaller units if there is no density bonus/height increase for the project
- For rezoning, would be helpful to know what percent of the City will require rezoning?
- Agrees with public comment re: local skilled workforce and VMT reduction. Would be good for South Pasadena to have a local workforce requirement.
- Suggested more public outreach, with an emphasis on going to the people, and enhancing the site maps.
- What about the Caltrans housing?
- Some cities are fighting the RHNA
- Many of the regulations from the state in the Housing Element are impossible to meet
- Are many SCAG jurisdictions going to be in compliance?
- Sites maps could be better, add a legend/key. Note whether a site is vacant or non-vacant.
- Thinks the City has been doing a good job of getting the word out to the public about the project

November 17, 2021

City staff presented to the City Council on the public draft Housing Element at their meeting on November 17, 2021. No public comments were made during the meeting. The following summarizes the input and questions from the City Council:

- Does the Monterey Road site (Site #3 in Appendix A) have an approved project?
- Ostrich Farm sites – what input has been received from property owners.
- Asked about the Carrow's site.
- Can the densities proposed in the draft fit within the 45 foot height limit?
- When will the aggressive ADU amnesty program happen?
- Is the City considering objective design standards to implement SB 9?
- Could SB 10 apply to only one parcel?
- Impressed with staff and the outreach that has been done to property owners. Thinks they've gone a long way toward addressing any controversy in the community.

- Amazing that there was no public comment at this meeting.
- The RHNA formula was unfair to South Pasadena.
- The Executive Director of Move LA was concerned about the RHNA approach related to High Quality Transit Corridors (HQTCs). Communities don't want HQTCs identified in the future because they will receive higher RHNA numbers because of them.
- Staff and consultants – good job addressing this complex topic.

May 10, 2022

City staff presented to the Planning Commission on the 2nd Public Review Draft and discussed the revisions made to the new draft (in person/virtual hybrid format).

July 20, 2022

City staff presented to the City Council on the HCD review letter for the 2nd Draft Housing Element.

July 26, 2022

City staff presented at the Planning Commission on the HCD review letter for the 2nd Draft Housing Element.

November 9, 2022

The City's Housing Element consultant presented at a Joint City Council and Planning Commission. The presentation included an overview of the California Department of Housing and Community Development's response letter regarding the Third Draft Housing Element, discussed anticipated responses to address the comments in the letter, and received feedback from the community, Planning Commission, and City Council on the comments and proposed responses.

February 1, 2023

The City's Housing Element consultant provided a summary of HCD's review letter regarding the 4th Draft Housing Element to the City Council and presented options for addressing remaining comments, including missing middle housing, identification of additional city-owned sites for lower income homes, increased zoning capacity along arterial corridors, and tenant protections.

February 9, 2023

This meeting was intended to be a community meeting focused on the Housing Element, but a majority of the City Council wanted to attended so was noticed as a City Council meeting. The meeting was conducted as a workshop to further discuss revisions to the Housing Element and collect resident feedback.

February 15, 2023

City staff and the City's Housing Element consultant presented refined ideas for addressing remaining comments based on feedback received from the Council and community over the preceding two meetings. Staff rreceived direction from City Council and Planning Commission on how to revise the Housing Element.

July 17, 2024

The South Pasadena City Council hosted a special study session on the proposed ballot measure related to the height limits. During this study session the City Council discussed the need for new height districts in the Downtown, Ostrich Farm, and Huntington Drive areas to support the new housing units.

July 31, 2024

The South Pasadena City Council held a special meeting to place Measure SP on the November 2024 ballot. At this meeting the South Pasadena City Council adopted a Resolution ordering the South Pasadena Neighborhood Preservation, Local Control Measure (Measure SP) to be placed on the November 2024 Ballot. The majority of voters voted "Yes" on Measure SP.

March 26, 2025

The Planning Commission and City Council hosted a joint study session on Measure SP Implementation, including new height limits and development standards. The City's consultant presented on the undertaken outreach efforts, results of said efforts, and preliminary recommendations for discussion by the Commission, Council, and public. The Planning Commission and City Council provided the City and consultant with helpful feedback and direction for amendments to the Housing Element, Downtown Specific Plan, and Zoning Code.

April to June 2025

From April to June 2025 the Planning Commission held four public hearings focusing on the density, height, and development standard recommendations the Commission will be sending to City Council for consideration and approval. These hearings occurred on April 29th, 2025, May 7th, 2025, May 20th, 2025, and June 10th, 2025. Through these four hearings the Planning Commission was able to settle on their density, height, and development standards, which they presented to the community at the Planning Commission Community Meeting on June 16th, 2025.

June 2025

The Planning Commission held a public hearing on June 24th, 2025 to finalize their recommendations and officially send them along to City Council.

August and September 2025

The City Council held two readings of the Housing Element in August and September, the first on August 20th, 2025 and the second on September 3rd, 2025. On September 3rd, 2025 the City Council adopted the draft amended Housing Element.

Written Public Comments

Received Prior to Public Draft

The City received the following written public comments prior to the release of the Public Draft Housing Element.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 9, 2020) expressed concern over staff report indication that City does not currently allow ADUs within the Mission Street Specific Plan area. Mr. Gelfand noted that such a policy is unlawful, citing State code, GC 65852.2.

Mr. Matthew Gelfand on behalf of Californians for Homeownership (August 13, 2020) expressed satisfaction with the recent Planning Commission meeting where the City Attorney confirmed that the City is required to allow ADUs in the Mission Street Specific Plan's Districts that allow residential uses. Mr. Gelfand stated that during a Planning Commission meeting, staff suggested the definition of 'public transit', under the state ADU law, is limited to major transit stops. Mr. Gelfand states that this is not true and provided a citation for ADU state law, Gov Code 65852.2(j)(10). Mr. Gelfand states that the City does not have a parking problem, it has a "driving problem". Mr. Gelfand believes that reducing parking will actually alleviate traffic. Mr. Gelfand states that parking is meaningless in consideration of citywide. high access to transit. Mr. Gelfand states that the City's proposal to count 1,000 ADU units toward its RHNA allocation is preposterous; however, the City's plan to incentivize ADU development is taken seriously. They feel it will result in a modest increase in ADU production.

Leonora Camner, Executive Director of Abundant Housing LA, and Anthony Dedousis, Director of Policy and Research of Abundant Housing LA, regarding Preliminary Sites Analysis from the July 21, 2020 Planning Commission Agenda Report (September 4, 2020). Ms. Camner and Mr. Dedousis identified major issues in the Preliminary Sites Analysis, including:

1. The report appears to treat new housing capacity (i.e. the potential for new housing) as equivalent to realistic housing production (i.e. actual new housing). This is incorrect; they are not the same thing.

2. The report contains extremely optimistic forecasts of future ADU production which are extremely unlikely to be achieved even with aggressive policies, based on recent development trends.

3. The Preliminary Sites Analysis for lower-income housing is unlikely to meet California's standards for affirmatively further fair housing.

4. By accommodating insufficient housing growth to meet the RHNA targets at each income level, the Preliminary Sites Analysis is likely to fall afoul of the No Net Loss requirement.

They conclude their letter noting that Abundant Housing LA (AHLA) published a detailed memo, "Requirements and Best Practices for Housing Element Updates: The Site Inventory", explaining the key legal requirements and AHLA's recommended best practices for housing element updates. They offer availability to discuss our concerns further, and offer recommendations for additional policies to incorporate into South Pasadena's Housing Element Update.

Dr. Josh Albrektson (via email to HCD, February 25, 2021) informed HCD that they would receive a letter from Abundant Housing LA, YIMBY Law, and others regarding South Pasadena's current Housing Elements plans. Dr. Albrektson claims the City is not following any of the rules in the HCD's June 10th memo. Dr. Albrektson states the City is going to HCD for a review soon, so Dr. Albrektson wanted to give HCD some local knowledge. Dr. Albrektson states that the City is passing an ADU ordinance that will make it harder to build ADUs. Dr. Albrektson states that in the fire zone, they will require all ADUs to be within 150 ft of the front property line, have sprinklers, and for all garage and structure conversions the parking lot must be replaced.

Dr Josh Albrektson (March 8, 2021) provides a list of six issues he identified as "illegal" in the preliminary draft Housing Element sections, referencing a Housing Element Memo he states the City does not comply with. Theses issues are:

1. Claiming a projection of 1,000 ADUs in the Housing Element.

2. Objective design standards versus subjective design guidelines for ADUs and what really qualifies as an objective standard.

3. It is illegal to backdate an ordinance or apply it to projects that have completed a pre-application checklist. This comment related to the City's inclusionary housing ordinance and the definition of "deemed complete."

4. Inclusionary units and density bonus cannot be used to count for RHNA units in the Housing Element. The analysis MUST use the base zoning.

5. The inclusionary housing ordinance will cause a significant drop in realistic development capacity.

6. AB 1505, regarding rental inclusionary housing, commenter provided a link to an HCD 2019 memo about this law.

Dr. Albrektson concludes with stating that South Pasadena will not produce a compliant Housing Element due to not following HCD's guidelines. Dr. Albrektson states that there are more reasons other than what he listed for which he predicts HCD will reject the City's draft element.

Abundant Housing LA (March 10, 2021) references a past 2020 letter the organization sent to the Mayor and identifies five concerns, some of which are carried forward from the 2020 letter, about the City's preliminary draft Housing Element sections. The five major concerns are:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its map of best candidate sites appears to include many sites where redevelopment is extremely unlikely.

2. Planning continues to make overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies.

3. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

4. Planning indicates that the proposed Inclusionary Housing Ordinance will help the City achieve its lower-income RHNA targets without a clear assurance that this ordinance will be accompanied by adequate zoning densities.

5. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

The organization provides recommendations for each identified concern for the City to consider.

Dr. Josh Albrektson (via email to HCD, April 12, 2021) introduced himself and summarized past public comments he has provided to the City about the Housing Element. Dr Albrektson indicates when he believed the City's actions were in conflict with State housing law and/or other guidance from HCD. The time frame of his comments range from July 2020 to April 2021.

Dr. Josh Albrektson (via email to HCD, April 13, 2021) presenting items he would like HCD to tell South Pasadena regarding its preliminary draft Housing Element sections. The list of points is below:

1. ADU estimates must be realistic.
2. A 10% Low and 10% VLI inclusionary housing requirement is a significant governmental constraint to housing and that must be accounted for in the realistic development capacity calculations.
3. Realistic development calculations must include factors like topography [and existing uses meaning that]...realistic development potential for these sites ...should be much less than 50%.
4. All sites included must be realistic. Sites that are currently leasing or have no owner affirmation or city sites that require replacements cannot be included in the sites inventory.
5. All sites included in vacant land list must actually be realistically able to be developed.
6. All sites must include a realistic number of possible affordable units.
7. Provided link to own sites inventory sheet

Dr. Albrektson provides additional information in the email that generally appeared to support his initial points above and offered some new ideas, listed below:

- Development limitations, including the City's height limits and inclusionary housing ordinance are impeding development.
- Market trends indicate multifamily development interest is low
- The City offers "representative project" examples that are dated (from 2005/2017) and would not comply with current laws and are therefore not representative.
- Using inclusionary units and state density bonus is not a substitute for appropriate zoning and is specifically outlawed. What this will actually do is make it so that almost all buildings can no longer be financially viable and nothing will get built in South Pasadena.

Andrew Jarnagin (April 28, 2021) describes what he identifies are three key issues with the City's 5th Cycle Housing Element that should be addressed in the 6th Cycle. These three issues are:

1. Encourage transit-oriented development in the downtown area
2. Remove barriers to affordable housing
3. Provide data to support policy and projections

Mr. Jarnagin offered additional comments for the City's Planning and Building Department. Mr. Jarnagin concludes with questions for the City related to its capacity to support meeting RHNA targets.

Dylan Casey, Executive Director of California Renters Legal Advocacy and Education Fund, (May 5, 2021) commented on the City's ADU ordinance. Mr. Casey states that the ordinance as currently proposed presents numerous conflicts with state ADU standards. Mr. Casey claims that if the Council fails to amend the ordinance to resolve these conflicts, South Pasadena would lose the ability to apply any development standards to ADU permits, and be forced to apply only the state minimum standards. Mr. Casey states that the proposed ordinance is in violation of Gov. Code Section 65852.2, as it would be more restrictive than is permitted under state law. Mr. Casey believes that the City should embrace ADU development and consider its benefits.

Anthony Dedousis, Director of Policy and Research at Abundant Housing LA, (via email to HCD, May 5, 2021), referenced two past letters (September 2020 and March 2021) submitted to City Planning. Mr. Dedousis notes that they have not received a response from City staff and City councilmembers.

Dr. Josh Albrektson (via email to HCD, May 20, 2021) sent information about inclusionary housing ordinance affordability levels recently passed by four different cities to provide a comparison demonstrating that South Pasadena's should be lower. The comparison cities were Pomona, Alhambra, Pasadena, and San Francisco.

Andrew Jarnagin (July 26, 2021) notes that he attended the May 26th, 2021 South Pasadena Planning Commission meeting and reported that HCD's review of the preliminary draft Housing Element sections was discussed in a positive light, which oversimplified the significant changes expected of the Housing Element in order to be in compliance. Mr. Jarnagin provided comments about HCD's informal review of the City's ADU projection and sites inventory. Mr. Jarnagin states that the South Pasadena community should be prepared for a non-compliant Housing Element from HCD. He believes that elected officials and residents must be presented realistic options for RHNA numbers to assess different approaches and determine policies that best align with local desires.

The Steering Committee Members of Our Future LA (September 14, 2021) provided feedback broken down into six focus areas. The focus areas are listed below along with the major topics within each focus area:

1. Protections – tenant protections including just cause eviction protections and enforcement, rent stabilization, tenants' right to counsel, strengthen permanent tenant education, and tenant anti-harassment protections.

2. Preservation – prioritize rezoning in high resource neighborhoods, don't include rent stabilized units in the sites inventory, implement no net loss laws, institute local programs and funding sources to preserve existing affordable housing.

3. Prioritization of Affordable Housing – value capture, create affordable housing on public land, 100% affordable housing overlays including for areas zoned R1.

4. Site Capacity Assessment – likelihood uses will discontinue, realistic capacity, report on progress towards 5th cycle RHNA, include a 15-30% buffer of sites.

5. Affirmatively Furthering Fair Housing – increase concentration of lower income households in areas where concentrations are currently low, reduce concentrations of lower income households in areas of noise or pollution, reduce noise and pollution, invest in historically disinvested areas including place-based strategies, analyze patterns of segregation and discrimination, prioritize site identification in high opportunity census tracts, identify funding

and programs to ensure affordable units are built, solicit input on the housing element from all socioeconomic groups.

6. Forecasts of ADU Development – should use safe harbor methodology, provide for mid-cycle adjustments, use city-specific data to forecast affordability.

Our Future LA requested the opportunity to meet with the City to address their concerns in greater detail.

Comments Received on Public Draft

Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes

and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.

- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.
    b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.
    c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.
3. Accessory Dwelling Units
    a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
    b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
4. Zoning
    a. Allow residential to be built in areas that are zoned for commercial use.
    b. Allow flexibility in inclusionary zoning.
5. Better entitlement process and reducing barriers to development
    a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
    b. Reduce parking standards and eliminate parking minimums.
    c. Cap fees on all new housing.

d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.

Anne Bagasao/John Srebalus (May 2 2022)

Our comments are primarily focused on 6.4 Fair Housing Assessment.

1) 6.4.1 Outreach

We question the validity of the data collected in community meetings during the Spring and Fall of 2020. South Pasadena residents and city staff were in the throes of a global pandemic. After delaying this process for two years, the City, in all it's wisdom, determined that the best time to ask for public participation on the Housing Element was two months into an internationally unprecedented health and economic crisis.

At this time, South Pasadena Tenants Union was hyper focused on keeping South Pasadena tenants in their homes with little or no help from the city's contracted agency Housing Resource Center. The City planning department and City Manager's instead of trying to help tenants, were busy scheduling important data collection surveys and meetings that would impact the future of South Pasadenans for decades to come. This was extremely poor planning on behalf of the City as many of us were scrambling to find the capacity to shift mental gears away from how to avoid getting sick to addressing the complexities of RHNA numbers and development in our city. We are not satisfied that City outreach to residents was adequate and therefore not accurate. As evidenced in the poor response to these surveys and attendance at meetings that were exclusively available to those with internet access in their homes, computers or mobile devices, we submit that your assessment data is insufficient and therefore your assessment is flawed.

It is stated that outreach was done online and through emails however both John and I were either excluded from participation or were not kept in the loop. We recall that in September 2020, an email was sent to Planning Director Joanna Hankamer with a copy to all members of the Council, Margaret Lin and Arpy Kasparian. Concurrently, similar community meetings were being conducted by the City regarding the Climate Action Plan. I remarked in my email dated 9/30/2020 that I was impressed with the content and frequency of the email contact from the City regarding the Climate Action Plan meetings. The majority of South Pasadenans ,who would be able to provide the most valuable input with regard to affordable housing needs, were managing unemployment issues, homeschooling and health issues. The City is well aware of the advocacy and work that South Pasadena Tenants Union, CareFirst and CalTrans Tenants United invest voluntarily and passionately into housing issues in our town. It is inexcusable, that the City did not ensure that we were at every meeting and could have easily emailed us directly as everyone in Planning and on the Council has our contact information on hand.

In the Outreach Summary section of 6.4.1 the document states that "feedback was received from members of the public, stakeholders, elected officials and others." South Pasadena Tenants Union and CareFirst are the viable stakeholders in issues of affordable housing, the homeless and low income households. The Housing Element document fails to identify these "stakeholders" referenced in 6.4.1. If the purpose of this plan, which I understand has cost us tens of thousands of dollars and hundreds

of hours of staff time, was to produce the best possible housing element, why did the City not go out of its way to make sure that we were at 100% participation?

In my email addressed to Joanna Hankamer, et al. on 9/30/2020 I mentioned that real estate development interest group Abundant Housing LA was actively recruiting non-South Pasadenans to attend the meetings to push the pro-development anti-affordable housing agenda. While SPTU was not in attendance because we were busy keeping South Pasadenans housed and the homeless cared for, Abundant Housing LA mouthpieces were at the table affecting housing policy in South Pasadena. Abundant Housing LA went so far as to take out sponsored social media ads to encourage their members from Los Angeles to infiltrate our community meetings. Of the attendees at the Fall workshop, to which you are using data to support your assessments, 10% were identified as Abundant LA members.

In July 2020, Mayor Khubesrian called a private meeting with four residents to discuss the housing element. Two were from CareFirst and only one member of South Pasadena Tenants Union was invited. The fourth was Josh Albrekston. The discussions in these meetings were not made public. Does the City or any of the consultants know if content from discussions in that meeting were used to form the Housing Element documents in any of its forms? If so, it should be disregarded because it was no part of public record. To my knowledge, City Manager Stephanie De Wolfe and Joanna Hankamer were in attendance but no other members of the Council.

On March 3, 2021 the City was to have posted the revised Housing Element for public review before closing for the weekend starting on March 5th. I received a message from Joanna Hankamer at 11:09 on March 5th that the agenda was delayed.

Conclusion:

When you come to the public and ask for our help but then don't make a good effort to provide us with the resources to participate, we question the commitment of the City in seeking community input. We should not have to chase down City staff to be able to participate. The City should make public participation as accessible as possible by ensuring that every resident is informed, and informed again, and that all stakeholders are at the table before moving forward with assessments and data and reports that claim to represent public interest.

We will not legitimize the Housing Element with our further analysis and feedback and demand more public input. We do not accept your findings as a true representation of housing needs in South Pasadena. Also, much of the data is over two years old. Much has changed. Much has changed.

Josh Albrektson (May 2, 2022)

This Housing Element doesn't address the main problems HCD had with the October Housing Element. For everything related to the 2017 laws and the 6/10/2020 HCD memo there is no significant difference between this draft and the October draft. It doesn't show how 65 to 70 DU/Acre is achievable under the base zoning of South Pasadena, it doesn't show how the highest inclusionary housing element in the state affects feasibility, and it doesn't address the timeline and how it takes multiple years to approve multifamily homes.

It also is unchanged in the Above Mod/Mod category even though there are multiple claimed units on hillsides and backyard tennis courts that due to environmental constraints homes can never be built.

It includes the three grocery stores and business park that SoPas was told to remove. And it goes from assuming 297 ADUs to 318 ADUs even though HCD told South Pasadena it should be around 10 ADUs per year. There also was none of the outreach performed that HCD told South Pasadena they were required to do and none of the public comments was address in the Housing Element. This Housing Element completely ignored all of the problems that HCD had with the October Housing Element and will be rejected just like that one was. Of note, I sent an e-mail on March 18th that was much more extensive regarding the October Housing Element. Everything in that e-mail still applies to this new Housing Element draft --

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

Delaine W. Shane (May 2, 2022)

Dear Honorable Mayor and Council Members:

I appreciate the opportunity to comment on the subject document; however, a frank discussion of what really is at stake beyond this documentation is even more important. South Pasadena cannot simply stand by and do whatever the State dictates on housing, while not equally judging the truly complex intricacies, relationships, and outcomes of water supply/drought, climate change, unequal economic/social justice issues, misguided actions that harm historic preservation, and minimizing fiduciary responsibility regarding the sale of Caltrans properties.

I fully understand the constraints that this subject document must adhere to as based on recent legal state mandates, and yet we cannot divorce ourselves from other planning and environmental areas that clearly interact with the proposed draft Housing Element. All documentation should be discussed in unison instead of separating the Housing Element from the General Plan Update, the Specific Plan Update, Zoning modifications, Environmental Impact Report, and even the already approved Climate Action Plan. It is a complex undertaking to plan the City's future when there are so many aspects to consider. All sides of this debate on housing must be heard; these plans are so vital to the City's development for the next 20 to 30 years in the long-term and even more so in the short-term within the next eight years.

My comments are divided into two sections: general perspective for your consideration and specific comments on the subject document for the planning consultants. Yes, the State long ago forcefully told our community that we residents must prepare for a freeway to be built through South Pasadena. We stopped that transportation fiasco and now we must stop the outrageous and exaggerated RHNA mandate and the related state housing legislation that will shred the character of our city. We need to control our own destiny. That is true democracy.

South Pasadena needs more affordable housing—without question. Housing should not be about pleasing the State or the for-profit developers who focus on luxury units. South Pasadena housing should be planned and accommodated in a sustainable manner for our residents and for those yet to come at truly affordable prices. This planning needs to be within the context of a small city that is merely 3.5 square miles and that will be able to operate with sustainable infrastructure, environmentally supportive practices, and financially sound protocols for our residents (homeowners and tenants, rich and poor, and the entire spectrum of diverse ethnicities, religions, etc.). That planning effort is very difficult to do today with the State's stranglehold on local jurisdictions, yet we must strive to try together.

We cannot follow blindly in step with the State. As of this moment, only nine out of 197 jurisdictions have approved housing elements for the State's planning cycle (In South Pasadena Review. 2022. By Haley Sawyer, "Progress on Housing Element Plods Ahead," April 29th, page 13). We are not alone in this quagmire of overzealous and misplaced mandates, along with highly restrictive instructions/-requirements on what constitutes a compliant housing element.

A coalition (Mission – Livable California) is currently collecting signatures and asking for support to have a State Constitutional amendment approved by the voters in 2024 to return land use and zoning directives back to the cities and counties. Council Member Evelyn Zneimer is the only elected representative from South Pasadena that openly supports this measure. Why doesn't the whole Council

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support this as well? Or, if not, why doesn't the Council push back more with the State and build its own coalition to fight the onerous RHNA mandate? Just because of one appeal that was destined to fail anyway does not mean that South Pasadena should surrender its rights to develop a more reasonable and accommodating expansion. South Pasadena, the fighter, stops after just one loss in a huge battle for control of its destiny? That's not the South Pasadena way that I recognize.

Here is the list of the jurisdictions and their representatives across the State that do support this proposed voter measure: Endorse - Our Neighborhood Voices. This coalition's principles dovetail perfectly with South Pasadena:

• Support housing as a basic right.

• Fight for truly affordable housing.

• Assure self-determination of local government.

• Preserve quality of life in our communities.

• Achieve smart and balanced growth.

• Respect lifestyle choices.

• Protect home ownership.

• Value the American dream.

It is time to collaborate with other jurisdictions and join coalitions to bring sense and true planning back to local control with respect to land use and zoning, and especially in all matters regarding housing in South Pasadena.

Thank you for your consideration.

Sincerely,

Delaine Shane

Delaine W. Shane

2003 Meridian Avenue

This generic document does little to validate the excessive development scenario proposed for our small 3.5-square-mile community. Clearly the draft Housing Element is not dealing with today's reality. It is light on specific details concerning critical and defining zoning and planning standards and criteria. It simply notes that this critical information will be determined after the adoption of the Housing Element. Conducting public outreach and participation by the city staff and consultants should not be done this way. This strategy is top-down planning and prevents honest discourse between different views during the genesis of the Housing Element.

The Housing Element should be presented with all other related plans/zoning/design requirements together, so that the full portfolio of planning tools, strategies, and options can be understood and considered in the context of South Pasadena and its position on accommodating future growth.

Notice my statement in the previous paragraph as "in the context of South Pasadena and its position on accommodating future growth." It's about what WE want and not the State. That is a huge difference and an important distinction being made. For example, other than building new housing units, I do not have a real sense from the Housing Element what the City policy and priority is in retrofitting old office buildings for apartments or the real seriousness for educating property owners on developing Junior ADUs. Adaptive reuse of existing buildings and junior ADUs are mentioned in the Housing Element but just that and not much more. Modifying existing buildings can generate less carbon and greenhouse gas emissions over new construction and can also preserve the historic nature/character of the neighborhood where the buildings stand.

Briefly, I will state very obvious facts that cannot be ignored by the City or by the State, and especially not in the Housing Element.

Water Supply and Drought

No matter how we conserve, adding 2,067 housing units will have a significant impact on our current ability to supply water to all South Pasadena residents. Water shortages and rationing are now a reality. We will have less water and more costs by the various water districts that will ultimately be passed onto us residents.

California Department of Water Resources

Survey Finds Little Snow as Statewide Snowpack Drops to 38 Percent Following Record Dry Months (ca.gov)

Metropolitan Water District of Southern California (click on weblinks for full details)

Metropolitan Cuts Outdoor Watering To One Day A Week For Six Million Southern Californians (mwdh2o.com)

Metropolitan Adopts Two-Year Budget To Address Drought, Climate Change While Mitigating Impacts of Rising Costs, Lower Sales (mwdh2o.com)

Upper San Gabriel Valley Municipal Water District

Drought – Upper District

Climate Change

With water shortages/droughts, climate change will impact reservoirs as well. As the levels in our state and federal reservoirs continue to drop to historic lows, there will also be losses in energy levels related to generating hydroelectric power. Apparently, if you subscribe to Clean Power Alliance-SCE, for 100% Green Power, the power source does not rely on hydroelectric processes. However, if you don't subscribe to this service, you may find yourself having more black and brown outages in the future. Refer to: Power Sources - Clean Power Alliance.

Lawns, trees, and other vegetation will have to be watered under key restrictions and quite possibly lawns may be prohibited in the future if we fall within a persistent, severe drought. This will have to be balanced with the need for open space, parks, habitat preservation, as well as considering shading alternatives if more trees die out. It is worth a discussion and evaluation in weighing the growth patterns of the City amid increased impacts to these biological resources.

Social/Economic Justice

How will building so many luxury condos (while adhering to the state's mandate of density bonuses/inclusionary incentives) benefit or balance the social/economic injustices we have in South Pasadena? There are discussions on "housing mobility opportunities" in the Housing Element for those residents who are struggling from paycheck to paycheck. Except for getting out of substandard rental units, I am not clear as to what difference it makes where individuals with extremely low/very low live, so long as it is in South Pasadena. Repairing the units and allowing people to remain in them at affordable rents (with voucher assistance) and not uprooting them seems the better approach and less draconian. Conversely, is it possible that the Housing Element as it now appears could impact persons of color who qualify for such "housing mobility opportunities" but fail to remain due to gentrification. No one should be paying up to 50% of their income for rent, yet some of our residents do.

Historic Preservation

I have absolutely no idea as to how historic preservation will survive in this housing planning cycle. Overlays, zoning, development criteria, and design are for another day depriving us of thoughtful discussions about historic preservation, new construction, and possible alternatives. This is simply not transparent and is wrong to have this information withheld or not completed until after the Housing Element is approved or close to being approved. Though this is not the CEQA process, it really shuts down any initial opportunity to set draft policies within our community through collaboration and cooperation. We have a precious historic treasure trove of buildings, and we have a responsibility to be good stewards in maintaining this historic fabric and character of South Pasadena. That doesn't mean everything will be frozen in time. No, we must develop the downtown further, but in a manner that complies with federal standards and our vision of what direction South Pasadena will take: Rehabilitation Standards and Guidelines—Technical Preservation Services, National Park Service (nps.gov).

Fiduciary Responsibility/Caltrans Properties

The City and its third-party vendor must stay out of the property management business with the remaining Caltrans properties. Seriously.

Where is the funding source for the City to make such purchases?

Where are the checks and balances to ensure things will be operated and maintained properly?

My neighbors and I are completely against SB381. We live adjacent to or within a few doors down of many Caltrans properties. The views of the Caltrans tenants have also not been heard and are not reflected in the Housing Element. No decision, such as making the properties permanent rental, should be made without the full public participation and discussion with our neighbors, including Caltrans tenants. We support the recommendations made by the South Pasadena Preservation Foundation and want to see existing or previous tenants have success in buying their homes.

Conclusion

South Pasadena doesn't need a boiler-plated, word padded State template to guide our City for the next eight years in housing development. Instead, South Pasadena needs to be a leader and examine its own resources, listen to its residents (especially renters who don't have a renter on the City Council and yet comprise some 50 to 55% of the population) on what is sustainable growth. South Pasadena also needs to collaborate with other jurisdictions and coalitions to fight the State on these RHNA numbers. If you haven't seen the Los Angeles Times today, one of its leading stories states: "California's population fell, again. But an inland boom could be turning things around." "Population growth remains strong in the Central Valley and the Inland Empire." This article requires a paid subscription, so I am including just a snippet. I am not suggesting that South Pasadena have no affordable housing units. It must. Just what can be determined as truly sustainable and not what SCAG or HCD wants.

SPECIFIC COMMENTS

Comments on Table VI-2 (Summary of Housing Programs for the 2021-2029 Housing Element)

1. Page 5, Program 1.a.—Energy Efficiency. "The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources." Why should solar systems continue to be encouraged by our City? While I am in favor of promoting renewable energy systems, more discussion on this one is needed. As noted on page 173 of the Housing Element: "In 2021, 95% of residents subscribed to the 100% Green Power option." That is in reference to the City's success in getting most of its residents to accept the Clean Power Alliance-100% Green Power. So, how does having an individual solar system on one's home improve that goal on energy efficiency from the City's standpoint? It is my understanding that the California Public Utilities Commission may be considering added charges on metering that may make it less cost effective for owners of these systems to get reimbursed when they sell their excess energy. Furthermore, manufacturing of solar panels is not carbon neutral, and there are environmental issues with disposal of older panels. From a financial standpoint, it may not make sense for some property owners to invest in this type of system, especially if they don't intend to stay in South Pasadena for a long time. Financing this type of system with some private installers may result in liens being placed on the properties that can be problematic during subsequent sales. Wouldn't it be more productive for City staff's time and efforts to focus on the other conservation techniques than on the solar systems? Perhaps, it is time to review the hastily approved 2020 Climate Action Plan and revise it so that it can also be properly interwoven into what is now being discussed in this element and the General Plan Update?

Page 5, Program 1.b.—Housing Acquisition. "The City will have priority to purchase the surplus properties after the existing tenants." My neighbors and I continue to object to this proposed action by the City via Senate Bill 381. This legislative piece was never thoroughly vetted by the residents, especially the Caltrans residents. The City has no ability or resources to take on the responsibility of purchasing many if not all the Caltrans properties within South Pasadena. We still wait for the two vacant former Caltrans properties to be converted into pocket parks. The whole process has been plagued with delays, neglect, and empty promises. The real intent we believe is to use these Caltrans properties with existing housing for permanent rentals with oversight from a third-party management firm. That is NOT what our neighborhood wants. We want existing tenants to OWN these properties. The City's policy should be to help the residents navigate and provide/seek funding if there are short falls in financing and not let the residents fail to secure their homes. That is why our community supports the South Pasadena Preservation Foundation's recommendations. These recommendations should be part of this section of the housing element. Managing rental properties by the City or more likely its contractor is not doable. The daily administrative duties and operations, the collections of rent and processing of vouchers, the complaints under an array of situations, the continual maintenance issues, the liability of injuries, etc. will be beyond the capabilities of the City to accomplish this monumental task without additional staffing and costs. A third party will minimize all these issues, like Caltrans did, to get the most out of the renters' money (and taxpayers too) and our neighbors who live next door to these houses and apartment buildings will be directly impacted through the neglect as what is the current situation. The City should act as a facilitator and "hand holder" for the tenants to get them approved by mortgage lenders and to be a point of contact for further advice, if needed. Program 1.b is simply a tremendous undertaking that the City lacks in being able to carry out and could be a financial disaster for us as a community. At the very least, the City should identify in this element, the projected costs of purchasing, maintaining, and operating these properties by the City (or a third-party designee) versus assisting the tenants to buy their homes and then helping them seek grants and loans to fix the housing units. The tragedy is that these were once quaint, working-class homes for hard working people. Caltrans took on the mantel of slum lord and we see the results of their cruel management.

Page 6, Program 1.c.—Housing Rehabilitation and Code Enforcement. "The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing." I completely agree with this statement. No one should live in substandard housing; however, I see no text in this housing element that protects the tenant when they make a complaint. This section needs to state how the tenant will not be evicted while the landlord makes good on complying with code enforcement's correction/abatement orders. Will the landlord pay for the tenant to be in a motel until they can move back in upon approval of code enforcement if substantial corrections are required? How will potential retaliation be prevented? Can the landlord use this as an excuse to "remodel" the unit and then increase the rent prior to the tenant moving back in? I believe that renters comprise well over 50-55% of South Pasadena residents. There needs to be more specificity in this section to ensure that existing tenants who have the ongoing misfortune to occupy substandard housing units will not be evicted or retaliated against when they register a complaint with code enforcement.

Pages 6 and 7, Program 1.d.—Assisted Housing Unit Preservation. "The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives." …. "If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources." This program is therefore to show compliance with the RHNA numbers for those residents that are earning extremely low/very low income (1,155 housing units). This program

will undoubtedly require the work of two or more FTEs (full time equivalent individuals, either employees or contractors). This program should not be funded by the General Fund, but by the State given such high numbers. If this must go through the General Fund, then the Housing Element should indicate the approximate cost to the taxpayers to implement this State mandate. How will this program be structured so that it can be meaningful to those who truly need such services rather than it de-evolve to just list some numbers (with or without verification) and then hand out fact sheets rather than be proactive and collaborative? After all, there are a lot of programs proposed by the City and not all can be carried out and monitored with a small staff. We cannot pay an endless amount to outside contractors. On Page 7, the last paragraph in the program explains what happens if owners sell their properties before the 55-year (for owner occupied units) and 45-year (for rental units) requirements that ensure such properties remain affordable for their set periods of time. Two questions come to mind. First, if a developer is relying on Program 3.d (Enable Parcel Assemblage) to build multi-housing units and one or more of the small properties are under Program 1.d (Assisted Housing Unit Preservation), does the owner/seller of the existing property still have to pay any money beyond the affordable sell price to the City? Several sad situations exist for why owners of affordable housing may have to sell, such as the death of the primary wage earner, the aging out of the owner, divorce, etc. but under the scenario I have presented here, it appears that only the City and developer would reap the monetary rewards and not the property owner. Second, does the placement of a "roll-over" restriction for another 45-55 years to protect at-risk units where the property owner sells the units prior to the first-time frame legally sound? I am all for ensuring affordable housing, but is there a legal precedent for this "roll over" restriction that essentially restarts the entire period again or just maintain the remaining affordable years left by the previous owner. It just sounds particularly onerous and not a true legal nexus. Could this "roll over" restriction place the City in legal jeopardy?

Page 7, Program 1.e.—Environmental Health. This program needs to be expanded to include air and soil contamination testing and mitigation on properties (especially those with existing structures) to undergo rigorous evaluation before constructing new housing units. I still go on record that the evaluation of buried soil contamination at the Seven Patios Project site was unsatisfactory and should have had more rigorous testing.

Page 8, Program 2.a.—Provide Technical Assistance for Projects with Affordable Housing. The second paragraph should become the first paragraph in this discussion and the number one priority of this program with these edits: "The City will reach out proactively to developers of 100% affordable housing to identify and vigorously pursue opportunities to the maximum extent feasible on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency." Still on Page 8 of this program contained within the column entitled eight-year objective with this edit: "Expand housing mobility opportunities through affordable housing in locations distributed throughout the City and encourage affordable development in high resource areas by facilitating timely review of development proposals…." This edit reflects more accurately and explicitly Goal 2.0. Last comment for this program within the same column: "The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023." Clarification of this statement is needed. Does the City's objective for the 100 applications mean just in receipt of or does it seriously mean processing them and seeing these through completion as built units? What if no applications are received at the extremely low/very low income levels? What then? And if high numbers of applications are submitted within a short timeframe, which income level(s) applications will be given the highest priority?

Page 10, Program 2.e.—Facilitate Density Bonus for Projects with On-site Affordable Housing. "The objective is to approve at least 600 affordable units during the planning period through density bonuses

to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households." Of course, streamlining approvals means excluding CEQA discretionary action and making it ministerial. This separation rather than complete discussion of the Housing Element, the General Plan Update, Specific Plan Update, Zoning Modifications, Design Requirements, and Climate Action Plan combined is extremely problematic. It is precisely at this ambiguity juncture where we are concerned that with the loss of CEQA input, our voice in how the development is proposed, designed, and pushed through will be lost.

Page 10, Program 2.h.—Incentivize Special-Needs Housing. This program needs to ensure that such housing be distributed throughout the City. Once such buildings are erected, what will be the mechanism to ensure that the operators of said housing will be good stewards and good neighbors?

Page 12, Program 2.j.—General Plan Affordable Housing Overlay and Program 2.k—Affordable Housing Overlay Zone. These overlays should be made available now for public review. One will be adopted by the General Plan approval date and the other no later than October 15, 2024. That does not allow for much public discussion or flexibility in revising such overlays, as needed.

Page 12, Program 2.l.—Facilitate Affordable Housing on City-owned Property. "This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023." Shouldn't the public know what the City's assets are that could be considered for public housing first before this Housing Element is adopted? We have very little open space/parks in several parts of our City. Some of these assets also need to be utilized for that purpose. As a side note, it is difficult to hear that the City doesn't even know to the full extent what properties it owns outright, rents, or has easement rights over. And yet, the City expects to deal with all the bureaucracy, financial peril, and personal involvement that will entail encouraging development and managing Caltrans properties. Simply unbelievable.

Page 13, Program 3.a.—Rezone and Redesignate Sites to Meet RHNA. This program is nothing more than promoting refill parcels or redevelopment parcels-still a controversial approach for generating more affordable housing. If a property owner wishes to voluntarily participate, then it is not an issue. This program should not be a planning tool in which the City decides which properties are not at their highest and best use. Nor should eminent domain be employed for this program.

Still on Page 13 under this same program: "The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program." These statements should be discussed publicly now and not near the end of the General Plan Update/rezoning identified as being October 15, 2022. These other documents that the consultants have been writing about will be hundreds if not thousands of pages long collectively. Again, it is the State driving this deadline and that is why the City needs to push back. Height limits, open space, and parking are very critical issues to our neighbors and our community. And we are asked to sign off on this Housing Element without understanding what the City will define as its new standards. Ultimately, we will lose our recourse to remedy mistakes because CEQA will no longer come into play. This is wrong and not democratic.

Page 14, Program 3.b.—Mixed-Use Developments and Adaptive Re-Use. We don't have information on the zoning changes at this point. We need to see how the zoning within the City will change to support the Housing Element.

Page 14, Program 3.c.—Replacement of Lost Units from Residential Demolitions. "Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community." This needs clarity to ensure protection for the residents. Does this mean that before existing affordable housing is demolished, the current tenants will be guaranteed replacement housing before demolition commences? If so, who is responsible for their temporary housing costs (which might last for a year or so)? If not, how can you make a statement that residents will be able to remain in the community if they are amongst the first "casualties" of demolition? Vacancy rates in South Pasadena are low even for rental units that moderate income individuals can afford. What about the extremely low/very low income population?

Pages 14-15, Program 3.d.—Enable Parcel Assemblage. What if an adjacent property owner does not wish to sell their home to the developer? Will the City then proceed to take the property through eminent domain to ensure that the RHNA numbers are being met? With all the incentives the City is proposing to give to the developer, such as more height, additional stories, waive lot merger fees, and perhaps a lessening of parking requirements in areas that are already built out, absolutely no consideration is given to the residents. There is no acknowledgment from what I can tell from the Housing Element on how much our neighborhoods already suffer and that with new development will be compounded such as deteriorated streets and limited to no parking. The developers cannot fix our current problems. Does the City expect that the character of our small City will remain unchanged with this over-the-top densification? How will the City prioritize the historic homes on the inventory list throughout the City? Many homes have been modified over the years. So, will the City follow the tactic of Caltrans and deem that these historic homes can therefore be demolished? And again, what can other neighbors say about it, when it has become a ministerial action with no CEQA involvement because it fits with an ambiguous housing element with no zoning modifications presented to us at this time to discuss and consider?

Pages 15-19 for Programs related to Accessory Dwelling Units (ADUs). I could not find anything about short-term rentals (e.g., AirBnB). Such housing stock is detrimental to achieving affordable housing goals and objectives. One or more of these programs need to explicitly state the policy of either no such rentals permitted or a set limit with specific restrictions in a policy/ordinance. I am certain there are already residents that have this type of operation in service, so it is important to have a dialogue to see what is most reasonable and fair.

Page 19, Program 3.m.—Implement SB 9 and SB 10. Isn't SB 10 optional for the jurisdictions? The text indicates that SB 10 zoning amendments would be considered by December 2024. Why the delay? All these pieces need to be examined now. Is the City piecemealing this planning effort? The Housing Element needs to focus more on potential adaptive re-uses of existing commercial buildings and junior ADUs. They are mentioned but their actual potential is not really examined or prioritized.

Page 20, Program 4.a.—Land Use Controls-Emergency Shelters. What does the BP zone mean? I was unable to find the definition in the Housing Element. Location of such shelters are important and the zoning of them should be discussed now and not one year after the Housing Element is approved.

Page 20, Program 4.b.—Land Use Controls—Transitional and Supportive Housing/Low-Barrier Navigation Centers. This is a euphemism for half-way homes. The City is planning to revise the Municipal Code so that these homes can be placed without discretionary CEQA review in areas zoned for mixed use and non-residential zones permitting multifamily uses within two years after the adoption of the Housing Element. I know this is also a controversial topic, but it needs to be discussed now. All the "pieces" of the planning jigsaw must be available for people to understand, discuss, and voice their opinions.

Page 21, Program 4.c.—Land Use Controls-Flexible Zoning Regulations. Does this flexible zoning program also include those centers (i.e., half-way homes) in Program 4.b?

Page 21, Program 4.f.—Senate Bill 35 Procedure or Policy. This draft policy on streamlining "eligible" projects per the cited California Government Code needs to be available for us now to review and not by the end of the year when the Housing Element is already adopted.

Davis White (May 31, 2022)

To whom it may concern,

The California Department of Housing & Community Development (HCD) recently published a letter in response to Temple City's implementation of Senate Bill 9 (SB 9) which has sweeping implications for other jurisdictions in this process. The letter focuses on the city's ill-founded attempt to reduce the intensity of land use for SB 9 projects without any attempt to concurrently increase intensity elsewhere, as required by the Housing Crisis Act of 2019 (HCA). Any change in intensity of units or size without counterbalancing affects feasibility. HCD has found this violates state law. Temple City's SB 9 ordinance—and HCD's response—also contains a laundry list of don'ts which may affect a jurisdiction's Housing Element compliance. Specifically, the letter called out Temple City's use of square footage restrictions, height and story restrictions, courtyard requirements, parking limitations, LEED standards, underground requirements, and even affordability deed restrictions. All told, such requirements for SB 9-related projects which go beyond standards for other projects may be construed as governmental constraints.

Jurisdictions will have to identify and justify such constraints in their Housing Elements. Lastly, the letter stresses that a jurisdiction's implementation of SB 9 is covered by state laws other than the HCA and State Housing Element Law. This includes, but is not exclusive to,

State ADU Law, AFFH, and Anti-Discrimination in Land Use Law. How a city implements SB 9 has wide-reaching considerations. Jurisdictions should be fully aware that SB 9-related projects are not separate nor exempt from their ordinary zoning laws

and instead should be included within existing codes. The point of SB 9 is to give homeowners the means to increase the density of their properties. It is not a dead-end in state law.

Attached to this email is HCD's letter to Temple City for reference.

Sincerely,

Davis White

--

Davis White he/him

yimbylaw.org

(415) 298-0788

Josh Albrektson (June 20, 2022) (Twitter Post)

South Pasadena is required to show they have enough zoning to allow 2,067 homes will be built over the next 7 years. They just released a Housing Element that shows where they claim the "Future homes" will be built. Me and @taxingainteasy are gonna take you so see them.

To start with, South Pasadena claims that this entire mountainside will be redeveloped with homes. They have no plans to actually do it and never actually would, but they still make the claim.

(Blue dot is where I am standing for video)

In fact, in the Housing Element they even specifically state that it will always be open space at the same time they claim housing will be built on it. They had these same sites in October and were told to remove them by HCD, but they are still there.

You really don't get a sense of how steep this mountain is until you actually go up there. This will be the first and last time I go up there. [He describes location of and road in relation to estimated "45 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 65 homes are going in this area (25+40)]

This is another place where they claim that homes will be built on a mountainside with a 60 degree incline road. Blue marks where I am standing for the video. [He describes location of housing sites in relation to estimated "70 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 11 homes are going in this area (7+4)]

Here is the video for reference.

SoPas claims that every major grocery store will be turned into low income housing. This Ralphs which serves most of San Marino and Alhambra and is the only grocery store around will be 133 homes, even though the owner never responded to any e-mails from SoPas. (Sound on) Video says: "Does this Ralphs look like it's about to go out of business? Looks pretty busy to me"

This SilverLake Ramen is actually about to open and at the last City Council meeting the mayor talked about how responsive the staff was to get the permits approved when it hit a snag. But According to South Pasadena this will be torn down in 7 years and turned into 263 homes.

Not only that, but this entire complex is planning to do massive renovations this year. In order to be included as a low income site you have to show that the current use is likely to be discontinued in the next 7 years. You don't spend millions on buildings to tear them down.

Speaking of grocery stores undergoing renovations, SoPas was told to remove this Pavilions from the list. SoPas is claiming they talked to the owner and he now wants to tear it down and build housing. SoPas will not give me any evidence of that conversation.

Here is HCD telling SoPas in December that these sites should be removed, but they are still there.

This was also featured in an amazing article by @RegJeffCollins with follow up articles by @publiceditor

On a related note, SoPas makes all kinds of claims in their Housing Element for communications with owners, but they don't publish them and have repeatedly refused to show them when asked. I have even put in PRAS and 210 days later I have yet to get a response from SoPas

See these power lines??? They are the main power lines that got from a power plant and supply most of the power to SoPas, San Marino, and Alhambra. South Pasadena claims that 15 homes will be built under these high voltage power lines.

But not only that, they also claim that they will move their Public Works yard here and build 34 units at that site. I am sure Edison is totally cool with storing heavy duty trucks under high voltage power lines. We will just shut down power for a year when it is built.

This is the parking lot for Rite Aid and other stores in a shopping complex. South Pasadena claims that the parking lot is not used for businesses. They would be shocked to learn there is a tunnel going strait from the parking lot to the businesses.

Rite Aid would also probably disagree with the assessment that the parking lot is not used for their business.

See this McDonalds??? It is one of the nicest McDonalds I have ever been to. No response from the owner, but South Pasadena claims that they will be turned into 47 new homes.

You might recognize a lot of these sites because they are almost unchanged from the sites that South Pasadena submitted over a year ago. They were told at the time most were not eligible, but they are still there.

Now, let's go to some of the little sites that SoPas claims will be housing. It is obvious that they just pulled these from a random computer program and never even looked to see if they were valid. This is my thread from the first draft they had.

They have lots that claim a driveway will be built on a 6 foot strip of land up into the hills.

Does this look like a future driveway up into the hills???

Random street next to high school is apparently going to be a home.

Street demonstration by @taxingainteasy

This home (red) and this persons backyard (blue) will be torn down and turned into homes.

I bet this home doesn't know it is going to be torn down.

15 foot wide strips of land are apparently potential future homes.

Some dudes tennis court(red) and the main walkway connecting Monterey Hills and the High School (blue, called the snake trail) are both supposed to be housing.

This lot has approved plans for a pocket park that is supposed to be built this year. SoPas also claims it will be a home.

This thin strip of land is supposed to be a home.

Sometimes you have random strips on land in the middle of the mountain.

Not Kobe!!!!! This building is half a block from the train station. SoPas claims it will be torn down and replaced with apartments at 70 DU/Acre. The only problem is there is a 25 foot height limit and one parking spot per bedroom minimum parking requirement.

Finally, Krispy Kreme. This is not being torn down, we are just happy it is here.

This list is just some of the worst examples from the Housing Element. I don't include how South Pasadena enacted the highest inclusionary housing ordinance in the state to make sure no buildings will be financially feasible, in part because you cannot take a picture of that.

BTW, if you are looking for who to blame for the Housing Crisis,

@GVelasquez72 is in charge of @California_HCD. Under his leadership countless examples like the ones above have been approved. Like Vista being allowed to claim their 10 year old city hall.

You also have @Jason_Elliott and @CaHousingGuy who have yet to refer a single city for prosecution for a lack of compliant Housing Element, even ones that are openly defiant. Jason claimed that Newsom was going to hold cities accountable.

ADDITIONAL NOTES

Outreach to low income housing providers: Need to add reference to City outreach to Hollywood Community Housing Corporation to explore possibilities of partnerships and to understand the needs of LI housing providers.

Site 9 - (Yards): The site identified has been further examined and seems not to be feasible. Change on the notes to say that the current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the Yard, in order to vacate the property for an affordable housing project.

Josh Albrektson (June 21, 2022))

There are a lot of amazing claims made for the low income sites in this new Housing Element. In March before it was published I asked Angelica if she could share anything that will be used to claim a site is suitable and Angelica refused to send anything over (See below) The day after the new Draft Housing Element was published I asked Angelica for specific things related to the claims made in the Housing Element. She refused to send them over. I filed specific PRAS on May 11th for communications with the single family homeowners that they claim will develop in sites 14 and 15, any contact with Edison over the moving of the Public Works yard beneath the power lines for Site 9, the new communications with Vons and Pavilions about owner interest in developing housing (sites 20 and 21), and communication with this YMCA board member for site 23. These were not broad PRAs and should have returned 1-3 documents each, documents that Angelica should have easy access to. South Pasadena has not filled a single one of these PRAs despite multiple requests. South Pasadena is making claims in their housing element about low income sites and deliberately making sure the public cannot examine the validity of these claims.

Angelica Frausto-Lupo (March 14, 2022)

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Friday, March 11, 2022 8:00 AM
To: Margaret Lin <mlin@southpasadenaca.gov>; Angelica Frausto-Lupo <afraustolupo@southpasadenaca.gov>

Subject: Can I get some information

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe. With the Housing

Element release coming up I was wondering if I can get some information. I'm asking for it by e-mail because it would be much easier for you guys than more extensive PRAs. All of this information should be easy to obtain. 1. How many ADU building permits were issued in 2020 and 2021?? 2. Can you give me a list of projects that have turned in applications that the IHO would apply to since it was implemented?? I don't need anything extensive, just the address and number of proposed units in each project. 3. The evidence for each low income site in the Housing Element that you are using to claim as substantial evidence that the current use will be discontinued?? Margaret knows what I am talking about for this stuff. Thanks.

Josh Albrektson (June 30, 2022))

South Pasadena just e-mailed a comment letter to residents 8 days before the HCD letter is due. It is an incomplete document and even being somebody who knows housing law it is hard to fully comprehend. This is not real community outreach. Because I am off this week I should be able to provide a comment on some of the things in that letter that is misleading/false by the end of the week. I will include one thing here. " Proposed revisions in the section under Historic Land Development Patterns (approximately page 94) ahead of the sentences about the height limit initiative: The City does not have any growth control or management policies in place, and has not historically," This is just flat out wrong. They enacted the 45 foot height limit in 1983 and also enacted a slow growth policy placing a cap on 60 new housing units a year. They did this in part because Asian people were moving to South Pasadena. They also banned minorities from owning homes until 1965. Here are articles from the LA Times in the 1980's describing South Pasadenas growth restrictions. I have pulled out the relevant paragraphs and italicized them. https://www.latimes.com/archives/la-xpm-1987-10-25-ga-16043-story.html Minorities, Growth Like other cities in the western San Gabriel Valley, South Pasadena, which covers less than 3 1/2 square miles, has experienced both a significant influx of minority residents and a drive to build. Almost a quarter of the city's 24,400 residents are Asians, according to city officials. Fearing that South Pasadena is losing its character as a typical American small town of single-family homes, residents have battled plans for condominiums and major commercial projects. In 1983, voters rejected a proposed twin-tower office building that had been unanimously supported by the City Council. Then, after Simmons and Getchell petitioned for a ballot measure, voters imposed a 45-foot height limit on new construction. Now Simmons is leading a similar initiative drive to restrict minimall construction in the city. Cap on New Housing Last year, the council, under pressure from citizens' petitions, voted to place a cap of 60 new housing units a year in the city. https://www.latimes.com/archives/la-xpm-1988-11-28-me-363-story.html But city leaders say South Pasadena and its old-fashioned way of life are protected by a community-nurtured resistance to change. South Pasadena was one of the first cities in the region to adopt a slow-growth policy. In 1986, faced with a proliferation of condominium complexes and apartment buildings in the southern part of the city, as well as a voters' revolt, the City Council imposed a 60-unit annual limit on new multifamily developments. "We've protected ourselves pretty well," Woollacott said. Static Population The city's reluctance to build is reflected in population statistics. The population in neighboring cities has ballooned, mostly with new arrivals from Asia, but South Pasadena's has increased by an average of only 84 people a year since 1970. While the city was keeping a lid on new apartment buildings, slowgrowth activists turned down a string of proposed commercial developments, using intense political pressure or the initiative process. For example, in 1983, when a local merchant proposed to erect two multistory office buildings, angry residents petitioned for a ballot measure limiting the height of new construction. The measure won, and the so-called "twin towers" died a sudden and unlamented death. In recent months, two major projects have also succumbed to slow-growth sentiment. First, developer Thomas Stagen withdrew a plan for a 150-suite hotel on Fair Oaks Avenue, citing the community's "virulent opposition" to the project. Then, the City Council, acting as the Community Redevelopment Agency, scuttled a move to declare 74 acres of prime commercial area in the city a redevelopment area, after rebellious local merchants displayed signs

portraying the council as a big octopus, seeking to control the city. In 1989 led by a local NIMBY Group SPRIG South Pasadena began implementation for a new general plan that downzoned the city from having a capacity of 60,000 to 25,000. LA Times article at the start: https://www.latimes.com/archives/la-xpm-1989-08-27-ga-1552-story.html General Plan update that includes a excerpt from the Task Force from 1990:(page

13) https://www.southpasadenaca.gov/home/showpublisheddocument/220/636721709083330000 As the new decade begins, however, South Pasadena is faced with the twin threats of burgeoning multi-residential growth and continued deterioration of its commercial areas and business tax base. South Pasadena did not allow minorities to own houses. In 1964, a latino USC professor was allowed to buy a home because they mistakenly thought he was Native American. There is a TON more racist things in this article that South Pasadena did such as banning black children from the community pool and blocking off a street that connected them to the Latino El Sereno, but those were not housing related. https://www.coloradoboulevard.net/when-south-pasadena-was-a-sundown-town/ Housing In 1964, Manuel Servin, a Mexican-American professor at USC, managed to buy a house in South Pasadena, even though Mexican Americans were specifically restricted from doing so. Native Americans had no restrictions placed on them and City officials mistakenly approved his purchase in South Pasadena. Shortly thereafter, in the mid-sixties the Federal government provided funding for affordable housing with the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents and more law suits against the City of South Pasadena.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Josh Albrektson (June 30, 2022)

I'm gonna send my comments as I write them because SoPas dropped this letter 8 days before the deadline for HCD to make their findings.

Comments on Responses to HCD Preliminary comments.

1A. City needs to remove all sites from Table VI-44 that have backyard tennis courts, current homes, plans to be a pocket park, sites that do not exist on the APN map, and ones that are trails that are used to get to the high school.

1B. The Los Altos housing development covering SouthWest South Pasadena was done in 1965. Since that time there has not been a single new road built in the mountains of South Pasadena. There have been lots developed, but all of these lots are on existing roads. All lots that do not have road access should be removed, regardless of the slopes.

Page one contains a list of all sites by APN which should be removed.

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/ edit?usp=sharing

You all have seen the videos but you can see how unrealistic it is to claim a road will be built down this hill.

https://twitter.com/JalbyMD/status/1538986717599830016?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

1C. More than 50% of RiteAids business comes from people who park in the parking lot. You cannot just claim "This will be resolved." And the parking lot was not for sale, the whole site including the Rite Aid building was sold about 8 years ago. It was not just the parking lot.

See how many people are using the tunnel to get to the parking lot:

https://twitter.com/JalbyMD/status/1538992058236407808?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

2A. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

2B. The City talks about the single family homes in the South West of the City and how ADUs would help increase housing on those sites. South Pasadena enacted a ADU ordinance that made that area a high fire zone and instituted many restrictions so that ADUs cannot be built in that area. There is a e-mail from Reid Miller of the HCD ADU team to Liz Bar-El talking about and this included in the 5/21/21 e-mail sent out by Paul to the City. (see attached email)

3A. Sent out different e-mail quoting the LA Times articles from the 1980's about how "South Pasadena was one of the first cities in the region to adopt a slow-growth policy." And banned minorities from buying homes until 1965.

3B. "The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles."

On May 23rd South Pasadena decided against implementing bike lanes in the city and instead used the money to expand a one lane road of Orange Grove to a two lane road at a cost of $500k in order to make it easier for people to get on the freeway. As part of the Housing Element South Pasadena should commit to implementing the adopted 2011 master bike plan by 2025.

Link to them rejecting the bike plan for the road widening:

https://twitter.com/ActiveSGV/status/1528818927588937728

Adopted but not implemented 2011 Bike Plan.

https://www.southpasadenaca.gov/home/showpublisheddocument/1793/636721709083330000

3C. Regarding Program 2.e and the IHO increasing the supply of affordable housing. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

Josh Albrektson (July 1, 2022)

5A. Site 18 cannot be developed without destroying the McDonalds drive through in site 17.

5B. Please ask to see the last contacts of the City with sites 3 and 6. What I have received from my PRAs implies both sites are not viable, with site 3 specifically telling the city that the IHO means his project can no longer work.

5C. Almost all sites are in locations where commercial projects can also be built and the probability of that happening is not taken into account at all. In the case of Vons and Pavilions, sites 20 and 21, that is actually happening with both undergoing extensive renovations in 2022. (Pavilions now and Vons planned)

5D. South Pasadena limited SB 9 so that all units can be a maximum size of 850 st ft. That guarantees a single family home is more likely to be built since they can build to 0.35 far. San Francisco did a feasibility study on SB 9 and determined that there was almost no sites in San Fran that a SB 9 project would be more feasible than a single family home, and that is without the 850 sq ft maximum SoPas does.

https://sfplanning.org/sites/default/files/documents/citywide/SB9_Summary_FinancialFeasibilityAnalysis.pdf

6A. I think the numbers "consolidation on sites 10, 15, 19, 21 and 25" on the HCD letter is wrong. There is no site 25.

6B. Sites 10, 20, and 23 have the same owner. Sites 13 and 14 do not have the same owner. Site 14 the city met with an affordable housing developer and instead of developing decided to extend the lease of the playhouse located on the site.

7A. Paul told the city in May that the power lines are not a feasible site for anything. The Public works yard (site 9) should be removed from a list of viable sites. South Pasadena also counted the power lines sites for 15 moderate income sites on Table VI-44, line 6. This should also be removed.

7B. See comments 1A and 1B above. There has been no new roads built in the Los Altos (SouthWest SoPas) since 1965 and the only lots that have been developed since that time had access to a road. All sites without road access, the planned pocket park, the guys backyard tennis court, the snake trail, and sites that don't exist should be removed.

Every site on page one of this spreadsheet:

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/edit?usp=sharing

8A. They should only be allowed to claim the average ADU building permits for the last 36 months of whenever they get an approved housing Element. Other cities such as Los Angeles show there is a bump for two years due to pent up demand but then there is a drop in applications over time.

8B. SoPas does not address the fact it is one of the richest cities in the Los Angeles II category of the scag survey and that it is unlikely that any ADU will be affordable to a low income family or individual unless it is given to family. Also they do not factor in that about half of all ADU applications will not be used for new housing but is instead an expansion of the current living space.

9A. They should never be allowed to have an "eight year objective" because that means it will never happen.

10A. Program 3.a is just a program that says sometime in the future they will study what kind of zoning is required to allow the density claims made in the Housing Element to be feasible. That kind of information should be done in the Housing Element itself.

10B. The city forced 815 Mission to do a feasibility study for its density bonus. This feasibility study showed that the only way a 10% VLI housing project is feasible is if 57 feet is allowed, significant FAR increase, and almost every single open space and other requirement was waived. I would imagine a 10% VLI and 10% LI would require a much higher height and FAR limits than South Pasadenas base zoning has. You can find the feasibility study on page 104 and the concessions granted on page 120.

https://www.southpasadenaca.gov/home/showpublisheddocument/29308/637855358954070000

11B. No mention of the Pre-Application or the times to get through Building. Mission Bell started the permitting process in August 2017. It received planning commission approval in Feb 2020. It still does not have building permits, almost 5 years since the first contact with the South Pasadena planning department.

https://southpasadenan.com/mission-bell-project-approved-planning-commission-tweaks-conditionsauthorizes-venture/

12A. I told the city as they were implementing the IHO that it was the highest in the state. I have repeated this statement about 15 times over the past year so the city cannot claim they did not know it. I provided them with examples of every local city IHO. I did math problems showing how it was non-viable.

They did a recent economic study this April that I sent in a different e-mail that showed that the IHO raised the prices by 11%. They implemented it with the purpose of shutting down development, as demonstrated by trying to backdate it illegally to apply to 815 Fremont. I sent in a report to HCD and Melinda Coy told South Pasadena this was illegal under SB 330 and they eliminated the backdating.

12B. The economic report that they are doing is to show how feasible a density bonus project would be.

They are not examining if the IHO is feasible under the base zoning standards. On page 121 of the recent agenda packet the South Pasadena states "Building on the pro forma analysis completed in Task 2 and the understanding that the IHO will automatically trigger the State Density Bonus"

https://www.southpasadenaca.gov/home/showpublisheddocument/29512/637879719642900000

Automatically trigger the state density bonus means that South Pasadena knows it makes any project under the base zoning infeasible. They also applied it to buildings under 10 units which are much more likely to be infeasible with the added costs.

Since it was enacted in April of 2021, there has been only one project submitted. That was site 11 where the developer purchased the site not knowing the IHO was going to be implemented. And if the 19 Moderate and 89 above moderate numbers are true, it means South Pasadena is not applying the IHO to this project.

We are one year into the cycle and South Pasadena has intentionally killed all housing projects with this IHO.

Because of this South Pasadena should have to provide excess zoning and programs to catch up from them shutting down all projects.

12C. There were contacts with developers when the IHO was being implemented. You will find comments from the developers of sites 8 and 3 on page 29 and 41, respectively, on the agenda packet when South Pasadena was considering the ordinance. You will see them stating that their projects are no longer viable. Victor Tang even did the feasibility analysis and showed that the IHO would cost the developer $933,000. For site 3 there has not been any contact with Victor Tang according to my PRA requests since this letter.

https://www.southpasadenaca.gov/home/showpublisheddocument?id=25699

13B. See Comment 11B. There has not been a single recent project that has received building permits. Ask the city for the dates between planning commission approval and building permits for Mission Bell, the Senior center on Fremont, and Seven Patios. All of these projects have taken over 2 years to get building permits and as of recently none of them have building permits per year.

18A. What the city describes as "Public outreach" is a combination of trying to talk to people who could give them more cover to claim that non-viable sites are actually viable. There were no meetings from November 17th until after this draft of the housing element was submitted. There was no effort to reach any residents, let alone renters or low income residents.

19A. Appendix B explains why the city doesn't think the comments are valid or applicable. It does not integrate any of the comments into the Housing Element.

Matthew Gelfand (July 5, 2022)

Dear Mr. McDougall:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. Our organization is monitoring local compliance with Housing Element law. We are writing to comment on the revised draft Housing Element submitted to HCD by the City of South Pasadena on May 11, 2022, as modified by the City's June 29, 2022 responses to HCD's anticipated comments.

At the outset, we note that other commenters have extensively detailed the inadequacies in the City's sites inventory, both in the context of the City's first draft housing element and the revised draft that HCD is reviewing now. Our comments are intended to highlight some of the most egregious problems with the inventory. We encourage you to review the comments made by others, including the extensive documentation provided on Twitter by Josh Albrektson. [https://twitter.com/JalbyMD/status/1538985994602459136?cxt=HHwWgMClqfbmydsqAAAA]

We also note that although the City provided some information about planned changes to its housing element in its June 29, 2022 responses to HCD's anticipated comments, the City did not provide specific information about which sites it intended to remove from its sites inventory.

Our comments here are based on the limited information provided by the City.

Non-Vacant Sites

The sites inventory in the City's draft Housing Element does not meet the requirements in Government Code Section 65583.2(g). The inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period.

What's more, the City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA. But the inventory does not identify evidence that the existing uses on each of these sites will be discontinued during the planning period. For example:

 HCD's prior letter pointed to three specific examples of sites with existing uses to be further evaluated or removed. For two of the sites (the Pavilions site and YMCA site), the revised draft Housing Element adds only vague statements about owner interest and does not adequately address the impediment of existing use. No additional information is provided for the other singled-out site (the Vons site), which is purportedly able to accommodate the largest number of units of any site with 157 lower-income and 263 total units. The City should be required to remove these sites from its inventory.

 More generally, the inventory lists three of the five area grocery stores. Each existing grocery store is a vital existing use that is exceedingly unlikely to be discontinued within the planning period. But it is even more unlikely that more than one of these stores will be closed, as the remaining stores will be forced to shoulder the burden of additional demand once one store closes. Although in one case the City is treating the store's parking lot as the area for development, the parcel includes the store itself and state law requires the City to show that the existing use (the store) will be discontinued in order to avoid the presumption that it will impede development; this makes good sense, as there is no way to develop on the parking lot parcel without discontinuing use of the store for at least several years in the absence of parking. The City should be permitted to list no more than one existing major grocery store on its inventory.

 The inventory includes a number of other sites containing existing uses for which the City acknowledges there is no evidence of developer or owner interest in redevelopment, and the City should be required to remove all of these sites from the inventory:

APN 5318-015-017 (900 Fair Oaks Ave.), purportedly able to accommodate 18 lower-income and 29 total units: This parking lot is leased to the Rite-Aid corporation through December 2035.2 [https://www.loopnet.com/Listing/900-Fair-Oaks-Ave-South-Pasadena-CA/14380777/] The draft Housing Element states that there is no interest from developers or the property owner. The fact that the property is not subject to a covenant with the adjoining property does not help the fact that it is encumbered by a lease until 2035 and cannot be developed within the planning period. The housing element notes that the site has been listed for sale, but conspicuously fails to reveal that it was listed as a parking lot to be used for income property through 2035, not as a development property.

APN 5311-012-019 (301 Monterey Rd.), purportedly able to accommodate 19 lower-income and 31 total units: Commercial building with an existing use as a liquor store. The draft Housing Element states that there is no interest from developers or the property owner.

APNs 5318-004-012, 5318-004-019, and 5318-004-023 (716 Fair Oaks Ave.), purportedly able to accommodate 17 lower-income and 29 total units: Commercial property with an existing use as a relatively new McDonald's restaurant. The draft housing element states that there is no interest from developers or the property owner.

APN 5311-004-010 (143-161 Pasadena Ave.), purportedly able to accommodate 50 lower-income and 83 total units: Commercial property with new tenants. Although the draft housing element suggests prior interest in development, it indicates that the current status (presumably since the new tenants) is unknown.

Undevelopable Vacant Sites

The sites inventory lists as sites for housing a large number of vacant parcels on mountainous terrain, not served by paved roads and with no access to utilities. Most of these sites have zero likelihood of being developed and they are either publicly owned with no plans for sale or privately owned and considered undevelopable by the owners. In some cases, themaps included with the City's housing element include references to roads that do not actually exist, such as "Harriman Avenue." "Harriman Avenue," as depicted in housing element (left) and the entrance to "Harriman Avenue" from the ground (right). In addition to having little or no likelihood of development, the City has not met the requirements of Government Code Section 65583.2(b)(5)(B) for these parcels.

Because these parcels are generally not served by a paved road, they should be addressed by requiring the City to remove all vacant parcels not served by an existing paved public roadway.

Density Assumptions

The highest-density project identified in the City's table of representative projects is a 50 unit/acre project that used 98% of the available FAR. Nevertheless, the City has used for some parcels an unrealistic assumption of 70 units/acre—a density that stands no chance of being achieved due to the City's voter-mandated 45-foot height limit and its restrictive development standards for FAR, setbacks, open space, parking, etc.

To justify this assumption, the City has cited two projects from other cities with very different development standards. The first project, in Hercules, is above the South Pasadena's height limit, so South Pasadena appears to have taken the absurd approach of simply omitting the unit count for the project's top floor in calculating the project's density without accounting for the feasibility and economies-of-scale differences between developing a four- versus three-story project. The second project is a smaller project in the City of Santa Monica. Both projects appear to be built up to the property line (indeed, the Hercules project appears to extend over the sidewalk) and have no visible parking. Nothing resembling these projects could be built in the City of South Pasadena.

The City should not be permitted to use a density assumption above 50 units/acre for any site on its inventory. In the alternative, the City could commit (in its rezoning program) to abandon its height limit or its FAR, setback, open space, and parking requirements on the 70-unit/acre parcels.

Thank you for considering these comments as you review the City's draft housing element.

Sincerely,

Matthew Gelfand

Ross Silverman (July 18, 2022)

To all involved;

I believe it is imperative that the upzoning include all CG, M, and even R zones adjacent to commercial corridors in South Pasadena.

Thank you

Ross Silverman
1008 Mound Ave.
South Pasadena, CA 91030

Josh Albrektson (Jul 18, 2022)

17 months ago South Pasadena enacted the highest IHO in the state. It was done to make sure that no housing could be built in South Pasadena and it succeeded. It killed every project except one. That is the schoolyard project where they purchased the land not knowing the IHO was about to be enacted.

In case the recent Housing Element letter wasn't clear, HCD actually wants housing to be built and doesn't care for bullshit fake "owner interest" and "Legal R1 lots" that housing will never get built. Here is one line:

"analysis on how given land use constraints such as height limits and the inclusionary zoning requirements may make development infeasible on sites"

After listening to the City Council meeting again I am certain that staff and Placeworks still don't know what the Housing Element law is in relation to the IHO. Amy Senheimer quoted the wrong law in the meeting and staff kept claiming this study proved the IHO to be feasible.

As I have said many times in public comment, you cannot use a density bonus to make anything possible for the Housing Element. It is at the bottom of page 14 of the June 10th 2020 HCD memo on Housing Elements.

" The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

Not only that, the city has to show that the IHO is not only barely feasible, but you have to show that it is LIKELY that the buildings will still happen with the IHO AT THE BASE DENSITY.

As I am writing this on Thursday I believe that SoPas will propose a 15% Low Income IHO. A 15% Low income IHO was not analyzed by EPS, but EPS did produce some great data that can be used to analyze IHOs in South Pasadena.

And this data shows that a 15% low income IHO is not feasible in South Pasadena with the current conditions at the base density (or even with significant upzoning). This would be very easy for me to prove to HCD using the data provided. It would also be obvious to anybody who has experience developing buildings or providing loans for buildings. It takes about $5 per sq ft rent to be feasible.

I want an IHO that actually means the buildings actually get built. For 17 months you had one that made sure that no buildings could get built despite my objections and proof it was the highest IHO in the state.

So if you want my support on this IHO this is what I propose:

1. 5% Very Low OR 10% Low OR 25% Moderate IHO

2. Buildings under 10 units fully exempted

3. In Lieu fee for fractions as described in the April Report. Builders can fully pay the In Lieu fee to opt out. (This is required by law)

4. If South Pasadena produces less than 200 units a year starting with the 2024 APR, then the IHO is eliminated.

Or you can enact a 15% Low Income IHO and wait for it to be rejected when I show HCD that it is not feasible using the data in today's report.

There is no developer or bank that would consider a 15% IHO feasible based on the data provided. I will also point out HCD told the City to reach out to developers in part so that the developers would tell them that the 15% is non-viable.

"Other Local Ordinances: While the element now describes the inclusionary housing requirement and local height initiative, it generally does not analyze the impacts on housing cost, supply and ability to achieve maximum densities, including densities proposed as part of this housing element. For example, the analysis of the inclusionary requirement should, among other items, address the 20 percent requirement and cost impacts, 10 unit threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law. The City should engage the development community as part of this analysis. Please see HCD's prior review for additional information."

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

Josh Albrektson (July 22, 2022)

The agenda packet has been published and I have read through it. Your staff still doesn't know the law/requirements of an inclusionary housing ordinance as it relates to the Housing Element, no matter how many times I have posted the paragraph at the bottom of page 14 of the June 10th, 2020 HCD memo.

All proposals guarantees a rejection of the Housing Element, so this entire meeting will be a waste of time.

Alan Ehrlich (August 11, 2022)

Hi Angelica,

A "draft' ordinance originating from CHC was brought to my attention yesterday but I haven't been able to determine if it was in fact enacted. While the draft does not appear to outright ban demolition of older buildings, if it does exist, it might be seen as a constraint on developement.

To the extent Josh A (or HCD) has not mentioned anything about this, either he (they) is (are) not aware of it or, as it appears, is a lesser issue of concern. Could you please confirm is this draft, or something similar, was actually adopted and on the city's books.

thank you,

Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

-"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

See #3 on Page 20. This is from 2017.

ORDINANCE NO (southpasadenaca.gov)

If this process is removed to allow for the development of affordable multi unit housing we could get more sites. There is nothing culturally or historically significant about most the buildings on Huntington or even those fourplexes on Brent and Park.

Josh Albrektson (September 1, 2022)

These are the programs I would like to see South Pasadena adopt.

In the June 29th letter to HCD the City made a commitment to increase the transportation options to lower income residents without cars (Page 10). I know this was probably a bullshit throwaway line so that you could pretend to be doing something without actually planning to do anything. Here are the bike programs that need to be firm commitments with deadlines and not just some bullshit "We will look into it sometime in 7 years." Of note, just last month 3 people were killed by a car on Marengo St, something that possibly would have been prevented if these changes were implemented.

1. The Mission Street Slow Street program is made permanent. (Bottom of page 9 of 6/29 letter). Bike lanes and no more than one lane of car traffic in each direction would be implemented and remain implemented. Right now there are bike lanes on Mission Street East of Fair Oaks and Bike lanes on Marengo. This would allow the entire eastern half of the city to have a safe route to bike to the train station. This should be done by the end of 2023.

2. The Bike lanes and one vehicle lane is extended west of the train station to Pasadena Street where there are bike lanes that extend to the Los Angeles border. This would allow the west part of the city to safely travel to the train station. This should be done by the end of 2023.

3. Monterey Road in Los Angeles has bike lanes. These lanes end at the South Pasadena border. The bike lanes should be extended to the junction of Monterey Road and Pasadena Ave. This should be done by the end of 2024.

4. South Pasadena schools are known as one of the best schools and there is no safe route for kids to bike to the 2 elementary schools on flat land. As mentioned about just last month 3 people were killed on Marengo Street.

4A. Class one Bike lanes should be done on Marengo Ave from Garfield Park to the City of Alhambra. These would be two way bike lanes on the east side of the street where Morango elementary school is. Going from west to east, it would be Parking south, Traffic lane South, Traffic lane north, Parking north, Bollards, Bike lane south, Bike lane North. This should be done by the end of 2024.

4B. Class one Bike lanes should be done on the South Side of El Centro extending from Orange Grove to Pasadena Ave where Arroyo Vista Elementary school is. Going from North to South it would be Bike lane going east, Bike lane going west, bollards, Parking going east, traffic going east, traffic going west, parking going west. This should be done by the end of 2024.

4C. The El Centro bike lanes should be extended from Orange Grove east to the train station. The South Parking lanes would be removed. Of note EVERY home on the south side of El Centro in this stretch has a garage and driveways that could fit at least 4 cars. From south to north it would be Bike lane going east, Bike lane going west, bollards, traffic going east, traffic going west, parking going west. This should be done by the end of 2025.

Timeline: For the last 4 multifamily projects South Pasadena has not had a single project get building permits, even though the earliest project was initiated in 2018. Extensive changes need to be made in the manner that South Pasadena processes housing. These are just some of the changes that should be implemented.

5. A total of 5 planner equivalents are required to be employed at all times. This could be 4 full time employees with 2 part time. This should be implemented immediately.

6. The pay for entry level planners, both currently hired and for all job postings, should be the average of Pasadena and Los Angeles plus 2% and benefits. This should occur immediately. For the last 7 years there has been EXTENSIVE turnover with the average person lasting 1 year in South Pasadena. There is currently only 1 part time planner who was employed by South Pasadena who was present a year ago.

7. The Community Development Director has her Salary immediately changed to the Average salary of the directors of the Pasadena, San Marino, Alhambra, and San Gabriel.

8. The pre-application is eliminated, effective immediately.

9. The program where a project has to pay for a planner that does the work of the city is immediately ended. South Pasadena can pay for this consultant if it chooses to.

10. All multifamily housing projects 10 units or greater are automatically moved to the front of the line and heard immediately.

11. All multifamily projects between 2 and 9 units are moved to the front of the line after 2 months.

12. Removal of CUP for all projects under 50 units.

13. All multifamily projects that are under 50 units and in the downtown specific plan, Ostrich Farm, or an identified Moderate or Low income site are not required to perform a Transportation study, Noise Analysis, or Climate Change and Energy analysis. These would be deemed acceptable and would automatically qualify for a class 32 exemption. If required, South Pasadena could perform a citywide analysis of Traffic, Noise, and Climate Change for all sites as described above at 30% over the claimed units in the Housing Element.

14. All housing applications are posted online once a week and updated when their status weekly so that it could be determined when the application was deemed complete, when the CEQA analysis was done, and that every part of the Permit Streamlining, SB 330, and AB 2234 act are being followed.

15. It is required that the first planning commission, Design Review, or Cultural Historical committee happen within 6 months of the application being deemed complete for all multfiamily housing projects.

16. All commission hearings are completed within 90 calendars of the first commission hearing for all multifamily housing projects. If not done within 90 days, the application is deemed complete. This includes all chair reviews.

There are extensive charges and requirements for all multifamily housing that make it infeasible. Of note, South Pasadena produced a feasibility study that showed that nothing is viable.

The following changes should be made immediately to make multifamily housing viable in South Pasadena.

17. The FAR requirements as stated in SB 478 are implemented immediately.

18. Multiple Story exception of a 45 degree from the front to posterior is eliminated. (Page 114 of 2nd Housing Element)

19. Private open space required for all projects changed to 75 sq ft per unit

20. Common Open Space required cut in half for all projects.

21. Removal of all requirements for how the private open space is accessed from the apartment.

22. Removal of all dimension requirements for the common open space.

23. Elimination of all open space requirements of elevation

24. Removal of all uncovered area requirements

25. Open Space, either common or private, can be on the roof of the building.

26. Removal of all parking requirements within half a mile of a transit stop for multifamily projects.

27. Removal of all commercial parking requirements within the downtown specific zone.

28. The city cannot require a development to provide public parking. (There are multiple previous housing projects where this was required and the parking lots are empty. The Mission Meridian parking garage across the street from the train station is at 41% capacity on a weekday and 18% on a weekend. It is the lowest % of any parking lot on the Metro Gold Line.

29. Single family parking requirements lowered to one spot.

30. Signage made by the city for all public parking lots. This should be done by 2025.

31. Immediate removal of the Inclusionary Housing Ordinance. The city knows the current IHO makes every project infeasible and both the planning commission and City Council directed the staff to change the IHO. The Staff decided to make it as a program for removal meaning that extensive time will pass with no housing being financially viable.

32. The city is proposing that there be a ballot initiative in 2024 to remove some of the height limit. This is COMPLETELY unacceptable. The height limit was identified as a significant constraint in the 12/21/21 HCD letter and the staff chose to not do anything about it. This should be required to be done in March 2023 and the Housing Element should not be deemed compliant until the height limit is officially repealed.

33. Removal of the following fees for multifamily housing: Tentative Parcel Map, Tentative Tract Map, Lot line adjustment, CHC Appropriateness, Environmental impact report, Zoning text and map amendments, Specific plan application, Specific plan amendment, Development agreement review, Planned development, Technology Surcharge, General Maintenance fee.

34. Removal of the Public Art Fee

35. Water connection and Sewer connection should be at cost.

36. Removal of all fees for ADUs.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Comments Received during the 7-day Review Period (September 15, 2022)

Yvonne LaRose (September 9, 2022)

The Housing Element considerations that are to be finalized by September 15, have a number of issues that are of concern and need to be addressed. Affordability is one of those issues. Some of the very indirect impacts of that issue are addressed in some research I did in April of this year. The research was related to the bills signed by Gov. Newsom regarding restrictive covenants, to wit:

> Governor Newsom Signs Bill Requiring Redaction of Unlawful Restrictive Covenants - California Land Title Association

A quote from the below article subtly reminds one of South Pasadena's Sundown standards and how the residual effects of that era still exist in many tenuous ways and are accepted as the community standard.

> **"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."**

We are challenged with creating more housing for a projected drastic increase in population that does not parallel our neighboring cities of similar size and constituency. The issue of how to create that housing goal with a limited amount of space is definitely a challenge, yet using San Gabriel as an example, the challenge appears to be reachable. The next question is how the vision can be attained while also making inclusion and equity part of the actualization.

The conclusion of the article provides food for thought as we strive to create a strategic housing plan that makes our city legitimately and in reality one of inclusiveness.

> **Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.**

Let us not use zoning laws to substitute for enactment of a thinly veiled practice of indirectly defaulting to what should be part of our dark history in the form of restrictive covenants couched under some new terminology.

Viva
Yvonne LaRose
Organization Development Consultant: Diversity/Title VII, Harassment, Ethics
Cell: 626-606-4677

Governor Newsom signed AB 1466 in September 2021 which mandates that racially restrictive covenants contained in any real estate deeds be removed.

https://www.clta.org/news/581830/Governor-Newsom-Signs-Bill-Requiring-Redaction-of-Unlawful-Restrictive-Covenants.htm#.YlhKDflKY2I.gmail

Find out when (the date) this action is to be completed.

Also see
https://www.kcra.com/article/newsom-signs-bill-remove-racist-language-housing-deeds/37790221#

A more detailed narrative is given in the KPBS article
https://www.kpbs.org/news/local/2021/11/18/keep-remove-racially-restrictive-covenant-attached-yourhome

A significant quote in that articles appears:

> When faced with racism, Dew said his grandparents didn't dwell on it or share it openly with their kids because they had to survive and find ways to thrive, "to be stronger than what society makes of you."

> He understands why his elders felt that way, but he also knows that when we avoid the hard truths of history, they are often erased.

as well as here

"You see it a lot in NIMBYism," said Nancy Kwak, a University of California, San Diego historian. "People are pushing back against changes that would make a neighborhood more accessible, so a really simple example is more affordable housing."

Kwak says when San Diegans talk about property values and things like "I earned this house" or "this is something that I deserve," she hears the same logic that was used in the past to defend segregation.

Although such statements aren't overtly racist, many homeowners' perceived right to control who can and can't live near them helps maintain the inequities embedded in the current housing system, say Kwak and others.

"Make no mistakes about it, yes the covenants are gone, but the zoning took its place and it's been wildly effective," said Ricardo Flores, executive director of LISC San Diego, a local nonprofit committed to affordable housing in the region.

With more than half of San Diego's residential areas zoned for single-family homes, Flores wants to see higher density housing built in these areas.

"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."

As well as this pivotal language that brings us back to the argument about "affordable housing" initiatives:

> The same mindset that gave rise to racial covenants a century ago was on display during the 2020 presidential election when former President Donald Trump made "protecting the suburbs" for white people a key plank in his campaign.
>
> Speaking to a crowd of supporters in Midland, Texas in July 2020, Trump drove the message home.
>
> "People fight all their lives to get into the suburbs and have a beautiful home," he said. "There will be no more affordable housing forced into the suburbs."
>
> A month later, he and Ben Carson, then Secretary of the U.S. Department of Housing and Urban Development, penned an op-ed in the Wall Street Journal entitled, "We'll Protect America's Suburbs."
>
> The tagline read: "We reject the ultraliberal view that the federal bureaucracy should dictate where and how people live."

The hidden history of racism in San Diego deeds

Buried in the deeds of homes and subdivisions across San Diego County are racially restrictive covenants that serve as stark reminders of the region's racist past.

> Without mentioning race, Trump clearly painted a picture of an imagined white-suburb under attack from "outside" forces that would change the neighborhood and perhaps even the value of one's home.
>
> Across the country and in San Diego suburbs have become increasingly diverse, but in this case, many viewed the use of the word "suburb" as a euphemism for "white."
>
> While racism is just one of a number of reasons why California remains mired in an affordable housing crisis, experts argue it's important that the history of housing discrimination remain front-and-center in our present-day debates.
>
> Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.

Victor Tang (September 10, 2022)

Hi,

This is Victor Tang, developer for site 3. We have already submitted plans to build 8 market rate units on three parcels. Per 6th Housing Elements, my site will be zoned Affordable Housing Overlay Zone. There is conflicting information regarding the rezoning date:

1. On page 14 under "Program 2.k", it says "Amend zoning to include overlay by Oct 15, 2024."
2. On page 17, under "Program 3.a", it says "The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays in the General Plan and Zoning Code are also addressed by this program."

If the rezoning date is Oct. 15, 2022, does it mean I can submit another plan with 50+ units right after Oct. 15, 2022? Do you have the zoning code and development standard of the Affordable Housing Overlay Zone for me to do a feasibility study? If it is the Oct 15, 2024 date, we have no interests in waiting.

For Table VI-41 on page 144, Tree Removal Application is missing. If a lot for development has native trees, there will be a public hearing by Natural Resources and Environmental Commission. It uses subjective standard and will stall the development for several months. For my past projects, the planning commission asked my architect to redesign so that one oak tree could be preserved. We had to spend a few months to have an alternative design to prove to the planning commission that alternative design to preserve the tree was not feasible.

I hope city attorney can review the Permit Processing carefully from page 141 to page 144 to make sure that the city has satisfied the requirements of SB330 (Housing Crisis Act of 2019). Summary of SB330 can be found here:
https://www.smwlaw.com/2022/01/13/applying-sb-330-in-real-life/ Here are some keys points of interests:

1. *Permit Streamlining Act provision requiring completeness determination within 30 days*
2. *Local agencies must notify an applicant of any inconsistencies with objective standards within 30 days of the full application being determined to be complete if the project has 150 or fewer units, or within 60 days, if the project has*

more than 150 units. The local agency must include all inconsistencies in this notification; any inconsistency that is not noted in a timely way cannot be used as the basis for denying a project.

3. A single residence can count as a "housing development project."

4. Only projects with two or more residences are "housing development projects" for purposes of Government Code section 65589.5, which prohibits cities and counties from denying or making infeasible "housing development projects" that comply with objective development standards, unless specific findings are made

Based on item 4 above, the city needs to stop using discretionary review on multifamily development immediately instead of waiting for "the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted' (page 141). City can offer developers incentives to subject their projects to discretionary review voluntarily.

30-day deadline for item 1 and 30/60-day deadline for item 2 are critical. For example, a developer can submit a project with 60-ft height. If the city doesn't notify the developer that 60-ft is not allowed by the zoning code before the deadline, city can't deny the project height later.

I talked to other developers and architects. Many are frustrated with the long entitlement process time. I was told there were 60-80 projects in the pipeline and I am not sure how many are qualified "housing development project". As the planning department is short on staff and it may not be aware of the significance of the deadlines in item 1 and 2 above, deadline for notifications may have been missed for many projects. Therefore the city has very limited basis to deny these projects. The city needs to give these projects entitlement quickly to clear the backlog and avoid possible lawsuits.

As the planning department is short on staff, many developers are willing to pay external planners to expediate the review process.

I have another project in Alto de Monterey Overlay District. The zoning code requests 15ft first floor setback and 35ft second floor setback. Even second floor ADU requests 35ft setback. I hope the city can update zoning code and ADU Ordinance in this district to make development feasible.

Best,
Victor Tang

Josh Albrektson (September 10, 2022)

You guys performed a feasibility study that showed that all buildings are not feasible under your current IHO.

This feasibility study did not include carrying costs or the costs to tear down the structure that is on the property.

This feasibility study also used prototypes that are not allowed to be built in South Pasadena.

This feasibility study used a return on cost of 5% and without the carrying and demolition costs claimed that ther prototypes that cannot be legally built in South Pasadena are feasible at 5.2% Yield on cost.

West Hollywood uses a 12% yield on cost for viability. San Francisco says 15-24% is marginal and 25% is feasible.

Using your numbers, a fully market rate project with no inclusionary units would have a 6.8% Yield on cost, again using a prototype that cannot be built in South Pasadena and without carrying or demolition costs.

How exactly can you guys say any inclusionary housing ordinance doesn't affect feasibility when 100% market rate projects (Like Mission Bell) do not pencil out today?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

John C. (September 11, 2022)

I believe we can raise height the limit in a way were more than 50 percent of the residents voters would have no problem with it. The way to do that is making a bipartisan deal with the residents of South Pasadena. I will use an example. Example, South Pasadena City height limit is 45 feet what if we say we raise the height limit by 5 feet. Will the residents of South Pasadena make a big deal out of this? In my opinion, no, I do not next South Pasadena resident would have issue. Also, if you put that on the ballot in election it would pass easily because the majority of residents thinking logically will not being making a big fuss over it. I know there will be the minority of the few resident will definitely make an issue out of raising the height limit by 5 feet, but remember not everyone is going to agree with this and also those resident are the minority. But, if you go the other way by saying you want to raise to 110 feet than the majority of residents will say no. I read in the 3rd housing element draft from a previous person comment that the height limit will have be raised by 12 feet. I believe most resident will have no problem with that or even if you ask to raise by 15 feet they still will have no problem. For this to happen the residents need to know how high the city need to raise the height limit and that question has not been answer.

From, John
Sent from Mail for Windows

Elizabeth Anne Bagasao, South Pasadena Tenants Union (September 14, 2022)

To Whom It May Concern:

South Pasadena Tenants is attaching our comments on the Third Draft Housing Element that was released for public review on September 8, 2022. It is our understanding that the deadline for the city to submit the third draft to HCD is September 15 however after review of the draft we feel strongly comment is warranted.

We thank you for your consideration of our comments and would welcome any discussion of our response to the Third Draft Housing Element.

Best regards,

Anne Bagasao on behalf of SPTU

SPTU Third Draft Housing Element Comments:

In the July 8 HCD encouraged "the City to revise the element as described…, adopt, and submit to HCD to regain housing element compliance."

After comparison of the HCD letters from December 2021 and the most recent of July 2022, we are concerned that the City has not sufficiently responded to the HCD's comments enough to satisfy compliance.

The July 8, 2022, letter states the following:

> *Local Data and Knowledge: While the element now includes some discussion of historical development patterns and racial exclusion for significant portion of the 20th century, it should include additional discussion of land use practices including zoning, growth controls, height initiatives and any other practices that affect housing choices since the latter half of the 20th century. This information should complement the discussion of the socio-economic patterns within the City and the City relative to the region and based on a complete analysis, the element should formulate appropriate policies and programs to combat past patterns and impacts on inclusive communities.*

The third draft fails to demonstrate strategies to combat past patterns of impacts on inclusive communities.

We assert that building ordinances, based in preservationist practices, create exclusivity and deter inclusion of very low- and low-income individuals, the disabled, and people of color. As stated in Section 6.4.6 on page 101, South Pasadena admits to adopting zoning and housing policies as recently as the 1998 General Plan with intent of limiting inclusivity if not keeping people out. This attitude continues to influence building and zoning ordinances in South Pasadena. A sampling of statements that reflect these attitudes are found in the comments from the Second Draft Housing Element are found within the Third Draft Housing Element

South Pasadena Tenants Union believes that those commenters are in the loud minority and do not represent the many who aspire to achieve a racially, culturally and economically diverse South Pasadena.

During the WISPPA presentation on 9/12, comments like "protect our neighborhoods" and "we are afraid" were responded to by City staff, not with a can-do attitude of encouraging enthusiastic cooperation with the State but a mood that supported the culture of exclusivity indicative of NIMBY culture.

A History of Exclusion

In Section 6.4.6, the Housing Element describes decades of planned exclusion. As per the text referencing the 1963 General Plan,

> "The first three objectives of the Land Use Plan were stated as:
>
> • *To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential,* ***where stability and exclusiveness are desired"***

Three and a half decades later, South Pasadena doubles down on its protectionist land use policies. From The Vision Statement for the 1998 General Plan the influencers pull back the drapes of their goal of maintaining a community of historic exclusivity.

> *" In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We*

are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added)

We see phrases in the above passage, that we also hear today in public forum and on social media: "preserve our small-town feeling", "preserve its single-family residential character", "honors our traditional values". This rhetoric, which is elitist, remains the impetus for all things related to building, transit, and most recently wildlife in South Pasadena.

The problem with the fetishization of the past in the form of "cultural heritage preservation", is that it perpetuates systemic bias.

We refer the City to this excerpt from an article written by preservationists, Franklin Vagnone and Samantha Smith and posted a blog to Twisted Preservation, A Cultural Assets Consulting Group. If you can recognize how the existing building code, zoning laws and cultural heritage ordinance reflect the list below, then it is incumbent upon City to do more than what is stated in response to the HCD comment at the top of this discussion.

1. Preservation is essentially an elitist, class and racially divisive activity whose result is a form of economic bias and segregation.

2. History sites can perpetuate a divisive form of nostalgia that supports and validates racism and exclusion.

3. Preservation can limit inclusion and perpetuate racial & social bias by regulating cultural narratives to simple themes.

4. Historical regulations, district codes, and Preservation restrictions can be latently economically restrictive and culturally exclusionary, benefiting only those individuals who can afford the added costs, thus ensuring a form of aesthetically gated communities that reflect the dominant culture.

5. Historic districting and preservation code requirements can be a contemporary form of "redlining" which excludes a diverse economic group of people from land ownership.

6. Preservation is susceptible to the harshest form of capitalism in that only those historic sites that are targeted with money actually get preserved. Preservation choices are a matter of economics, not just history. The most revealing, unglamorous sites have rarely survived, nor have they been preserved.

7. As Preservation has become more professionalized and can require a four-year degree, college has become more expensive and thus constricts the possibility of a racially, culturally, and economically equitable pool of professional practitioners. As a result, professional practices are sometimes biased.

8. Preservationist, right now today, need to stop fetishizing the built environment and begin considering how preservation itself is part of the problem.

9. Look at the money in Preservation. A budget reflects our priorities. Money goes where it is told. There is nothing natural about the market economy or what gets preserved. **Wealth Preserves Wealth.**

10. Language as a tool of bias in Preservation with a weak notion of the appearance of diversity rather than full systemic representation. *

We will direct you to the City webpage for the Cultural Heritage Ordinance. This is the very first paragraph:

"South Pasadena prides itself on the quality and historic character of its neighborhoods and its small-town ambiance. Maintaining these qualities is considered key for retaining residents…"

The ordinance was re-established in 2017 and contains a section that reads:

"To stabilize and enhance neighborhoods and property values…"

It appears that this ordinance, in its entirety, consciously serves to maintain and increase the upper income level status quo. This ordinance, by its own admission, is counter to any inclusive housing growth in South Pasadena.

We ask that the City state within the Housing Element a commitment to analyze the Cultural Heritage Ordinance **for any and all language, policies and requirements that impede affordable housing development and promote exclusivity.** It is not enough to condemn past practices. You must correct them.

Many of these caveats in the Cultural Heritage Ordinance impede the development of new housing. Without amending the ordinance, the City will run into a plethora of issues when actually trying to achieve the goals set forth in the Housing Element.

Example: Ordinance #2315 effective August 18, 2017, 2.6.5 E.3 states that property owners wishing to demolish any property built "at least 45 years prior to application" will have to undergo an approval process by the Cultural Heritage Commission. The procedure requires the property owner to contract incur expense related to the following:

"The determination as to whether a property is a Cultural Resource shall require a deposit by the applicant to cover City costs associated with hiring a historic consultant and/or an Architectural Historian; and/or a deposit to cover the costs associated with the preparation of an Initial Study, Environmental Impact Report, Mitigated Negative Declaration or Negative Declaration."

The ordinance goes on to describe a multitude of hoops through which the for the property owner will need to jump. The Cultural Heritage Commission is a volunteer body that meets once a month. How long does the process to receive sign off form the CHC to demolish a building built in 1978 take? How much investment of time and money is that costing any properties owner who may want to develop more efficient housing on their property?

This one rule alone is a tremendous impediment to the very work you propose in the Housing Element. A "45 year" rolling benchmark would mean that the multiunit complex at 1700 and 1720 Mission Street would have to undergo CHC scrutiny for redevelopment. How does the City justify 1978 construction requiring historical review?

SB 381

We encourage the City to follow the guidelines of SB 381. Opponents of SB381 argue that the conversion of the CalTrans houses to private ownership would create affordable home ownership.

However, the investment that will be needed to rehabilitate the homes to the standards required by preservation guidelines (there is that word again) would not qualify these homes as "affordable".

We ask that the City act on SB381 , and that any surplus houses be converted to affordable rentals. Those structures deemed to be beyond repair should be demolished and the land utilized by the City in partnership with affordable housing developers to build 100% affordable housing as per Program 2.1.

Further regarding the CalTrans properties, we request that the City cease its efforts in blocking the transfer of 626 Prospect to Friendship Pasadena Baptist Church. Not only is that property not ours to control, this legal wrangling looks like a taxpayer funded effort to keep certain people out of our city. Friendship Pasadena Baptist Church is the oldest African American congregation in the area, established in 1893. One would say "an historic black church". The city, bending to the will of a small group of residents, has resulted in two legal attempts to block the transfer to Friendship Baptist Church that would provide housing to low-income families. The bad optics of this story should be of more concern to the City of South Pasadena then it currently is.

Tenant Protections,Homeless Prevention and Preserving Existing Affordable Housing

The Housing Element Third Draft in its effort to demonstrate an understanding of how best to obtain certification has included a couple of programs that, while seeming practical, are incomplete. There is not one mention in the Housing Element regarding programs meant to protect existing very low, low income and moderate income South Pasadena tenants from displacement.

We reference Program 1.c and Program 3.c.

Program 1.c would trigger substantial renovation evictions of which we currently have one ordinance on the books that minimally protects tenants from renovictions. Without protections in place that would allow tenants to be able to stay in the units during construction or to return to units after construction is complete, at the same rate of rent they had been paying when enforcement was issued, the City puts tenants at displacement risk. Renters are the root of our community and to relocate them outside of South Pasadena, where their children go to school, where they may work, congregate, worship and obtain community services such as recreational classes or senior meals, is 100% irresponsible. They are not the peacocks.

We propose that the City adopt an ordinance that would require landlords to accommodate their tenants during required updates and repairs either by allowing them to remain in the units or paying their rent to live in a comparable or market rate unit still within South Pasadena. Once the property is up to code, the tenant would be able to move back in at the same rate of rent they were paying. The same ordinance should include language to protect tenants from actions by landlords that would trigger evictions or prevent the landlords from concocting ways of getting more money out of tenants such as imposing amenity fees.

SPTU is seeing incidents of landlords now tacking on "amenity fees". While rent can only be increased by 8% under AB1482, landlords are now charging arbitrary fees that are to cover "amenities" such as use of the laundry facilities, landscaping, etc. These fees are uncontrolled so not considered part of the rent, much like the resort fees at hotels. One tenant reports that her rent was increased this year by 8% and her amenity fee was increased by 100% put her monthly payment to the landlord well over the allowable amount under AB1482.

Program 3.c similarly displaces tenants without the benefit of local protections. Again, keeping existing tenants housed in South Pasadena should be our goal not relocating them to other communities.

Additionally, any properties that the City might expedite for demolition, that are currently occupied, are most likely affordable. Therefore, in pursuit of acquiring 10 new units of affordable housing we could potentially be losing 20 and in the process displacing the very South Pasadenans who need them most.

We request that South Pasadena include in its Housing Element proactive and concrete actions to adopt tenant protections that would ensure that tenants displaced as a result of Program 3.c are given the best fighting chance of remaining in South Pasadena. This would include, but not be limited to, a local ordinance for relocation fees required for any no cause evictions. We refer the City to that of the City of Pasadena and Los Angeles as models for such an ordinance. As a reminder the City now defers to AB 1482 which requires that landlords only provide one month's rent as moveout fee to tenants who are evicted without cause. That is not helpful in the very least. It's actually insulting.

Maintaining Affordable Housing Inventory

Program 3.f-3.k regarding ADUs, it's our understanding that the ordinance was revised to be in compliance with state law to increase the availability of long term housing, some of which could be affordable rentals.

In the aforementioned program sections, we don't see much about enforcement particularly of the use of ADU's as short-term rentals. It is common knowledge that the housing crisis in Southern California can be partially a result of the proliferation of commercially managed full time AirBnb properties. As far back as 2015, the community of Venice lost upwards of 10,000 units of affordable housing to Airbnb operators.

Without a local short term rental ordinance there is no way to monitor the use of all these new ADU's or to prevent them from being utilize as money makers for already high-income households as opposed to housing for family members or as affordable rentals. We therefore request that the Housing Element include a short-term rental ordinance.

Homelessness

Program 2.f shows no change to what South Pasadena is currently offering as homeless services under the County Measure H funding. We expected that an increase in services would be more responsive to the HCD comments especially since South Pasadena lost its only direct homeless service provider earlier this year. Shower of Hope, which was formerly serving unhoused individuals with mobile shower facilities in District 3 at Holy Family Church was also a site where homeless case managers from Union Station could regularly locate and identify individuals in need of services. Currently, South Pasadena offers no city funded services other than outreach and resource distribution to the homeless community.

Lastly, we see that the City references expanding the contract with Housing Resource Center for provision of services to tenants and those seeking information and assistance with housing programs, outreach and education. Since HRC has had the contract with South Pasadena, (2016) we have yet to see outcomes of said contract.

HRC proposed that their programs services would achieve the following:

> *"…will improve and expand affordable housing options, improve services to the homeless or specials groups, and increase access to resources for low to moderate -income residents in a variety of ways"*

As two volunteer organizations, SPTU and CareFirst who work closely with tenants in crisis and the homeless population of South Pasadena, are not aware of any indication that HRC successfully achieved

this goal. For example in 2020, HRC poorly advised tenants who had received no cause evictions during the LA County Eviction Moratorium telling them that their evictions were legal. This caused at least one family to self-evict from an affordable unit. HRC only responded when contacted by then Councilmember Rick Schneider. It was with the assistance of Code Enforcement and the City Attorney that SPTU was able to prevent the renovictions from going forward and stop the evictions. This action led to the Renoviction ordinance that was adopted later that year.

Additionally, the contract states that HRC will provide educational workshops within the City of South Pasadena. To our knowledge, there has not been such a workshop since 2020.

Because the outcomes of the 2016 cannot be quantified, we recommend that the City release an RFP for the future provision of those services mentioned in the Housing Element that refer to HRC as the provider. It's been six years and it's time for a review and refresh.

Citywide Height Limit Ballot Measure Repeal

We request that a repeal is citywide and not limited to specific areas of the city. A limited repeal would not help us to move the needle on our RHNA obligation. If we are going to do it, do it with the intent of achieving the goal of increasing affordability not protecting exclusivity of certain neighborhoods.

Lastly, we would like to point out that the General Plan Draft action items that provide for affordable housing incentives for "creatives" may not align with fair housing practice and is counter to the goals of the State to increase housing opportunities for all people. Frankly, it's just another legal attempt to keep some people out while encouraging others to come in. We look forward to the public review and comment period for the General Plan and hope that its congruent with the Housing Element, housing equity and inclusion

We thank you for your consideration of these comments and look forward to the implementation of a Housing Element that reflects our values of inclusion, diversity, compassion and equity. We, as South Pasadenans, want to see our City contribute a housing crisis solution by being good Californians and generally decent people.

Sincerely,

Anne Bagasao on behalf of South Pasadena Tenants Union

Elizabeth Anne Bagasao (September 14, 2022)

SPTU would like to add that the Third Draft Housing Element does not go far enough to support and assist low income and moderate income residents who live in South Pasadena today. The City has an opportunity to do more for these residents especially tenants with the Housing Element. Please take the opportunity to protect existing tenants and keep this individuals and families stable in our community.

Sincerely ,

Anne Bagasao
Sent from my iPhone

Comment: Dr. Josh Albrektson (October 20, 2021) informs the City that he will send in many public comments. Dr. Albrektson states that the Housing Element claims that the inclusionary housing ordinance provides streamlined process and provides benefits above the state density bonus. He believes that neither is true since the density bonus is the minimum required by state and there are no actual incentives or "streamlining." Dr. Albrektson is asking for clarification for the incentives and streamlining stipulated in the inclusionary housing ordinance.

- **How addressed:** The City's Inclusionary Housing Ordinance is mandatory for projects of a certain size, unlike the option to take advantage of state density bonus law. In addition, certain incentives are provided under the Inclusionary Housing Ordinance if applicants comply with objective design standards.

Dr. Josh Albrektson (October 30, 2021) claims they have gone through every moderate and moderate plus site in the Housing Element. Dr. Albrektson informed the City that he created a spreadsheet listing every site that has a "significant problem." He provided a link to the list of sites he has comments on. Problems are specified as sites with no street access, already have homes on them, community parks, and on steep mountainsides. Sites not on the list are appropriate to include by the Dr. Albrektson's standards.

- **How addressed:** The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

Dr. Josh Albrektson (November 2, 2021) stated that the inclusionary housing ordinance is a significant developmental constraint and listed his issues with the ordinance. Dr. Albrektson stated that the there was no feasibility study done and that the City was using it to fulfill their RHNA allocation. Dr. Albrektson compared the inclusionary housing ordinance to other jurisdictions in the State. Dr. Albrektson states that the Housing Element cannot be considered compliant as long as the inclusionary housing ordinance is in place. He states that it needs to be repealed and replaced with a researched feasibility study and warns that as long as the inclusionary housing ordinance is in place, nothing will be built in South Pasadena.

- **How addressed:** Additional information about the Inclusionary in-lieu fee study that the City has been conducting has been included in this draft in Section 6.4. Program 2.i in Section 6.8 commits the City monitoring the effectiveness of the Inclusionary Housing Ordinance annually and revising the ordinance if needed to improve its effectiveness at producing affordable housing units.

Dr. Josh Albrektson (November 2, 2021) stated how the City's projection of 297 ADUs in the next 8 years is unfounded and lacks the data to support the claim. He discussed flaws in the Housing Element's calculations of ADUs because they used building permit data from 2019 and 2020 prior to the adoption of two ADU ordinances, which are expected to make ADUs more difficult and expensive to build. He states this will result in only a small fraction of homes in South Pasadena that can build ADUs. Dr. Albrektson stated that future ADU development will be limited (due to the ordinances) and that the Housing Element's ADU projections are incorrect. He claims that the 2020 and 2021 increase in ADUs is more a matter of demand from the effective ban rather than a sustained trend.

- **How addressed:** ADU building permit approvals in the City continue to increase and permit processing times have decreased. No revisions have been made in response to this comment.

Dr. Josh Albrektson (November 2, 2021) provided comments on the draft Housing Element programs in Chapter 6.8 of the Public Review Draft Housing Element.

- Program 1.d Assisted Housing Unit Preservation – The City doesn't have any deed restricted affordable housing so how can the City monitor and why are there quantified objectives included to preserve this type of unit?
    - **How addressed:** This type of program is required by the state for inclusion in the Housing Element. If any deed-restricted affordable housing is created during the planning period, the City will implement this program related to those units.
- Program 2.a Provide Technical Assistance for Projects with Affordable Housing – More actual commitments are needed in this program. Suggest adding streamlining with specific timeframes and automatic approvals. Current city average is more than 2 years from initiation to building permit approval for multifamily projects.
    - **How addressed:** Revisions have been made to Program 2.a to provide more certain timing for program actions.
- Program 2.b Affordable Housing Production – No affordable housing projects have been submitted or considered through SGVRHT and the city has been a member for multiple years.
    - **How addressed:** No revisions have been made in response to this comment.
- Program 2.c CalHome Program – There is no such thing as a poor South Pasadena homeowner.
    - **How addressed:** Comment noted.
- Program 2.d Section 8 Housing Choice Voucher Program for Rental Assistance – He thinks the City should commit to more than just posting information on their website. Dr. Albrektson doubts that there are any Section 8 vouchers in use in South Pasadena.
    - **How addressed:** According to LACDA, there were 10 vouchers in use in South Pasadena in 2021. Revisions were made to Program 2.d to increase outreach to encourage use of vouchers in South Pasadena.
- Program 2.e Facilitate Density Bonus for Projects with On-site Affordable Housing – Dr. Albrektson thinks the timeline for this program should be much sooner. He says projects that have been approved in the City have been delayed and he believes the city could process this type of approval more effectively.
    - **How addressed:** No revisions have been made in response to this comment.
- Program 2.j General Plan Affordable Housing Overlay – Dr. Albrektson said that allowing 30 units per acre via the proposed overlay in areas that already allow 24 units per acre isn't sufficient incentive for applicants to include affordable units in their projects. He stated that in order for this overlay to work as an incentive it must give the applicant more height or density. He mentioned the City of Berkeley's affordable housing overlay as an example.
    - **How addressed:** Most of the sites included in the Housing Element that are proposed to received the Affordable Housing Overlay only allow lower densities currently. No revisions have been made in response to this comment.
- Program 2.l Facilitate Affordable Housing on City-Owned Property – Dr. Albrektson referenced comments he made on this program in another comment he submitted.
    - **How addressed:** Program 2.l has been substantially revised since the last draft of the Housing Element.
- Program 3.d Enable Parcel Assemblage – Dr. Albrektson thinks more incentives need to be included with this program.
    - **How addressed:** An additional incentive has been added to Program 3.d along with more detail about program timing and implementation.

- Program 3.f Allow and Facilitate ADUs – Dr. Albrektson stated that the city currently takes over 4 months to process ADU applications. He also said that it is difficult to find the ADU brochure on the City website. He commented that the recent changes to the City ADU ordinance make it impossible to use prefabricated ADUs on historic properties which make up 60 percent of all single-family homes in South Pasadena. In addition, he thinks that the terrain in the Monterey Hills wouldn't allow for use of pre-fabricated ADUs. He also noted that he doesn't believe this program or the other programs related to ADUs will increase ADU production.
    - **How addressed:** The City processing time for ADUs has decreased in recent months. The applications received and building permits approved for ADUs has continued to increase substantially during 2021 and early 2022.
- Program 3.j ADU Amnesty Program – Dr. Albrektson states that no one will make an ADU deed-restricted for affordable households in exchange for the waiver of $160 in city fees.
    - **How addressed:** Comment noted.
- Program 3.l Increase and Maintain Planning and Housing Staff Resources – Dr. Albrektson states the things called for in this program should be a basic function of a city. He states that the City's planning staff works too much and should be compensated more and turnover is high. He requests that this program commit to increasing salaries for the city staff positions mentioned in this program.
    - **How addressed:** Comment noted. The City has already made progress implementing Program 3.l which is noted via revisions to the program in this draft.
- Program 3.m Implement SB 9 and SB 10 – Dr. Albrektson thinks the program should be rewritten related to SB 10 with a better understanding of the law. He states that the City Council has spoken out against SB 9 and SB 10 and they will never be enacted in South Pasadena. Related to the parcels in the moderate and above-moderate sites inventory with 2 units assigned to them due to SB 9, he states that the City should include a requirement to eliminate single-family zoning on non-historic properties with a specific deadline if the city wants to claim these units in case SB 9 is overturned.
    - **How addressed:** The City took action by urgency ordinance to establish objective standards for SB 9 in December 2021, and will adopt a permanent ordinance, with updates based on more recent State guidance by mid-2022. Revisions have been made to Program 3.m with this updated information.
- Program 4.c Flexible Zoning Regulations – Dr. Albrektson states that the city's zoning regulations are not flexible.
    - **How addressed:** No revisions have been made in response to this comment.

Dr. Josh Albrektson (via email to HCD, November 4, 2021) stated that City staff planner Liz Bar-El (in an email she sent to HCD) compared the inclusionary housing ordinances of South Pasadena and Pasadena and said that they were the same because both jurisdictions have a 20% inclusionary requirement. Dr. Albrektson claims that South Pasadena has a much deeper affordability than Pasadena, which is significantly different because rental costs contrast for a moderate and very low income homes. Additionally, the commenter said that Pasadena has much less significant developmental limitations than the City of South Pasadena.

- **How addressed:** Refer to earlier response related to the Inclusionary Housing Ordinance.

Dr. Josh Albrektson (November 8, 2021) provides an in-depth personal analysis of the Draft Housing Element. His analysis is over 100 pages and provides a detailed examination of each section under the

scope of Dr. Albrektson's critique. Throughout this analysis, Dr. Albrektson references emails he's sent in the past.

- **How addressed:** See earlier responses.

Dr. Josh Albrektson (November 12, 2021) stated that the City is implementing a new HVAC and VOiP Phone system into City Hall in 2022 and 2025 at a cost of $360,000 and $480,000, respectively. Dr. Albrektson stated that the City is also spending over $200,000 for security enhancement. He claims that this is strong evidence that there are no plans to have the current use of city hall end in the 6th cycle.

- **How addressed**: The City Hall site has been removed from the sites inventory in this draft.

Anthony Dedousis, Director of Policy and Research of Abundant Housing LA (November 14, 2021) states that their letter is a joint response from Abundant Housing LA and YIMBY LA. They claim they submitted a comment letter in April 2021 and highlighted inconsistencies in that original email. They stated that the new draft does not meaningfully address their previous comments. They believe that the new draft of the Housing Element is not consistent with HCD's instruction, does not comply with AFFH requirements under AB 686, and does not include programs with concrete actions to facilitate housing production. They state that there are 6 issues that remain unaddressed in this Housing Element, including:

1. Planning's process for selecting sites and assessing their capacity fails to account for parcels' likelihood of development, and its draft site inventory includes many parcels where housing development is extremely unlikely.
    - **How addressed:** The City has continued to reach out to property owners about interest in development of sites in the inventory. Additional information has been added to Appendix A as applicable.

2. Planning has counted many vacant sites towards the moderate and above-moderate income RHNA targets, despite their unsuitability for housing production.
    - **How addressed:** The City evaluated all sites on the sites list individually and confirmed that they were suitable to include in the inventory.

3. Planning has made an overly optimistic forecast of future ADU production which is unlikely to be achieved even with aggressive policies.
    - **How addressed:** See earlier responses regarding ADU production.

4. Planning misinterprets a SCAG analysis of regional ADU affordability to suggest that a significant share of future ADUs in South Pasadena will be affordable to lower-income households, which is unlikely based on local rent data.
    - **How addressed:** Revisions have been made to Section 6.6 and Appendix E, however the City continues to rely on the SCAG affordability analysis as it is the best data available.

5. Planning's proposed Inclusionary Housing Ordinance is unlikely to achieve a significant portion of the lower-income RHNA targets, due to the economic infeasibility of redevelopment where high set-aside percentages apply.

- **How addressed:** See earlier response regarding monitoring of the effectiveness of the Inclusionary Housing Ordinance.

6. Planning fails to affirmatively further fair housing and break existing patterns of residential segregation in their site selection and their general approach to the housing element update, despite the City Council's recent adoption of a resolution to acknowledge "past practices of institutionalized racism" and a commitment to being an inclusive community in the present.
    - **How addressed:** Section 6.4 Fair Housing Assessment has been substantially revised since the last draft to address comments received and to address a new state law AB 1304 that went into effect since the previous draft was released.

Both organizations have three additional concerns with the Draft, including the forecast of future ADU Production, No Net Loss Buffer, and Fair Housing Issues and AFFH Compliance.

Dr. Josh Albrektson (December 14, 2021) claims it has taken too long for a multifamily housing project to be approved. Dr. Albrektson states that it takes about two and a half years from the day it was presented to the planning department to the first chance at approval. Dr. Albrektson claims there have also been requests for redesigns, as well as delays from the City.

- **How addressed:** No revisions have been made in response to this comment.

Sonja Trauss, Executive Director of YIMBY LAW and California YIMBY (February 28, 2022) provided their policy recommendations for 6th Cycle Housing Elements. They noted that the policies and programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. They made specific policy recommendations in 5 categories that are summarized below:

1. Affirmatively Furthering Fair Housing
    a. Prioritize rezoning in high resource, historically exclusionary neighborhoods.
        - **How addressed:** Historic exclusionary practices occurred throughout South Pasadena. Rezoning to address housing needs will address all income categories and will take place in areas of the City that are high resource.
    b. Establish a strong tenant protection ordinance so that new housing benefits everyone.
        - **How addressed:** No revisions have been made in response to this comment. However, revisions have been made to Programs 1.c to address the need for tenant protection in addition to Program 1.d which was already included in the draft Housing Element.
    c. Support homeownership opportunities for historically excluded groups. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.
        - **How addressed:** The City's Inclusionary Housing Ordinance was adopted in 2021. Part of its intent is to create more homeownership opportunities for lower income residents or those who would like to become residents of South Pasadena who have historically been excluded. In addition, Program 5.c has been added to this draft to support inclusion and to remove racially restrictive covenants from property deeds citywide.
2. Site Capacity
    a. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback

requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity.

- **How addressed:** Zoning work called for in Program 3.a addresses this comment. Revisions have been made to that program and to Section 6.4 to address constraints associated with existing development standards.

b. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.

- **How addressed:** The City is committed to complying with state no net loss statute and has included as many suitable sites as possible that can be analyzed to be adequate. The number of sites included in this draft exceeds the City's RHNA. Residential development will be allowed on a substantially larger number of sites once the General Plan, DTSP and associated zoning changes are complete.

c. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.

- **How addressed:** Housing regulations statewide and locally in South Pasadena have changed significantly in the last two years including related to ADUs and with the adoption of the Inclusionary Housing Ordinance. Basing likelihood of development for the 6th cycle on the 5th cycle housing unit development doesn't make sense in light of these changes.

3. Accessory Dwelling Units
   a. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.
      - **How addressed:** Programs 3.g and 3.h address this comment.
   b. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers.
      - **How addressed:** Programs 3.g, 3.i, and 3.k address this comment.
4. Zoning
   a. Allow residential to be built in areas that are zoned for commercial use.
      - **How addressed:** Sites currently zoned for commercial use are proposed to receive the Affordable Housing Overlay or to have their base General Plan land use and zoning changed in order to address the City's RHNA.
   b. Allow flexibility in inclusionary zoning.
      - **How addressed:** The City's Inclusionary Housing Ordinance allows a variety of options depending on the project type and whether an applicant chooses to comply with the objective design standards in the ordinance.
5. Better entitlement process and reducing barriers to development
   a. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.
      - **How addressed:** The sites rezoned to address the lower-income RHNA as called for in Program 3.a of this Housing Element will allow projects with 20 percent affordable units ministerially. Other projects are eligible for ministerial review under state law.
   b. Reduce parking standards and eliminate parking minimums.
      - **How addressed:** Program 3.a calls for the city to evaluate parking requirements as part of the DTSP and zoning amendments to implement the Housing Element.
   c. Cap fees on all new housing.
      - **How addressed:** No revisions have been made in response to this comment.

d. Provide local funding. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.
    - **How addressed:** No revisions have been made in response to this comment.

Anne Bagasao/John Srebalus ((May 2 2022)

Our comments are primarily focused on 6.4 Fair Housing Assessment.

1) 6.4.1 Outreach

We question the validity of the data collected in community meetings during the Spring and Fall of 2020. South Pasadena residents and city staff were in the throes of a global pandemic. After delaying this process for two years, the City, in all it's wisdom, determined that the best time to ask for public participation on the Housing Element was two months into an internationally unprecedented health and economic crisis.

- **How addressed**: The City held the following meetings to gain additional input on the draft Housing Element. #1 Public Workshop on October 21, 2021. #2 Developer Forum on August 15, 2022. #3 Community Outreach at South Pasadena Farmer Market on August 18, 2022. #4 Community Forum and Informational Workshop on August 20, 2020. Comments received at this meeting have been included in Appendix B.

At this time, South Pasadena Tenants Union was hyper focused on keeping South Pasadena tenants in their homes with little or no help from the city's contracted agency Housing Resource Center. The City planning department and City Manager's instead of trying to help tenants, were busy scheduling important data collection surveys and meetings that would impact the future of South Pasadenans for decades to come. This was extremely poor planning on behalf of the City as many of us were scrambling to find the capacity to shift mental gears away from how to avoid getting sick to addressing the complexities of RHNA numbers and development in our city. We are not satisfied that City outreach to residents was adequate and therefore not accurate. As evidenced in the poor response to these surveys and attendance at meetings that were exclusively available to those with internet access in their homes, computers or mobile devices, we submit that your assessment data is insufficient and therefore your assessment is flawed.

- **How addressed:** The normal operation of the City was significantly affected by the COVID19 pandemic, resulting in the closure of City offices, as well as financial challenges for the City. This created new situations with which the City had to contend with, and at the same time address the housing element preparation in a challenging new work environment. We apologize for any impact that posed on SPTU and other participants. The immediacy of the health issues became a priority, but the State did not authorize any extensions of the housing element timeframe, and a small staff struggled to attend to both efforts. As the City pivoted to virtual meetings and events, outreach efforts persisted. The web page contains an opt-in mailing list link, and both respondents have taken advantage of that opportunity and have been receiving emails from housingelement@ on a regular basis informing about related events, meeting or milestones. City staff has always been open to suggestions for participation but is not aware of any offer to provide information from the respondents.

It is stated that outreach was done online and through emails however both John and I were either excluded from participation or were not kept in the loop. We recall that in September 2020, an email was sent to Planning Director Joanna Hankamer with a copy to all members of the Council, Margaret Lin and Arpy Kasparian. Concurrently, similar community meetings were being conducted by the City regarding the Climate Action Plan. I remarked in my email dated 9/30/2020 that I was impressed with the content and frequency of the email contact from the City regarding the Climate Action Plan meetings. The majority of South Pasadenans ,who would be able to provide the most valuable input with regard to affordable housing needs, were managing unemployment issues, homeschooling and health issues. The City is well aware of the advocacy and work that South Pasadena Tenants Union, CareFirst and CalTrans Tenants United invest voluntarily and passionately into housing issues in our town. It is inexcusable, that the City did not ensure that we were at every meeting and could have easily emailed us directly as everyone in Planning and on the Council has our contact information on hand.

- **How addressed:** The comment appears to reference issues that occurred two years ago, with significant communications, outreach meetings, public meetings, and plan amendments since. Both respondents are included in the email list that regularly receives information. As the CDD employees referenced in this comment (Joanna Hankamer and Margaret Lin) are no longer at the City, current staff is not aware of the 9/30/2020 email and how it was followed up at that time. We disagree that ensuring that SPTU was at every meeting is without excuse or the responsibility of the City. As respondents were included on the mailing list and staff had communications with SPTU, significant efforts were made along the way to include the commentor.

In the Outreach Summary section of 6.4.1 the document states that "feedback was received from members of the public, stakeholders, elected officials and others." South Pasadena Tenants Union and CareFirst are the viable stakeholders in issues of affordable housing, the homeless and low income households. The Housing Element document fails to identify these "stakeholders" referenced in 6.4.1. If the purpose of this plan, which I understand has cost us tens of thousands of dollars and hundreds of hours of staff time, was to produce the best possible housing element, why did the City not go out of its way to make sure that we were at 100% participation?

- **How addressed**: The City held 7 public workshop, a developer forum and conducted an online community survey in addition to regular updates at the Planning Commission and City Council to keep the community engaged and updated on the Housing Element update process.

In my email addressed to Joanna Hankamer, et al. on 9/30/2020 I mentioned that real estate development interest group Abundant Housing LA was actively recruiting non-South Pasadenans to attend the meetings to push the pro-development anti-affordable housing agenda. While SPTU was not in attendance because we were busy keeping South Pasadenans housed and the homeless cared for, Abundant Housing LA mouthpieces were at the table affecting housing policy in South Pasadena. Abundant Housing LA went so far as to take out sponsored social media ads to encourage their members from Los Angeles to infiltrate our community meetings. Of the attendees at the Fall workshop, to which you are using data to support your assessments, 10% were identified as Abundant LA members.

- **How addressed**: The commentor appears to clarify that 10% of the members at the Fall workshop were members of Abundant LA. This cannot be verified, and is not a group affiliated with the City. When a meeting is open to the general community, the City cannot control its participation. All are invited to attend. Ultimately the proposed housing element policies are developed based on a number of factors, including State law, HCD guidance, planning principles

and public comment. The housing element team did its best to use the input received from all, whether in large or small numbers.

In July 2020, Mayor Khubesrian called a private meeting with four residents to discuss the housing element. Two were from CareFirst and only one member of South Pasadena Tenants Union was invited. The fourth was Josh Albrekston. The discussions in these meetings were not made public. Does the City or any of the consultants know if content from discussions in that meeting were used to form the Housing Element documents in any of its forms? If so, it should be disregarded because it was no part of public record. To my knowledge, City Manager Stephanie De Wolfe and Joanna Hankamer were in attendance but no other members of the Council.

- **How addressed:** Consultation with individuals outside of public fora is not prohibited and remains a valuable way to understand community concerns. Current staff is unaware of this meeting and its contents. The parties the commentor references have continued to provide comments during the evolution of the housing element drafts, and remain engaged in public dialogue.

On March 3, 2021 the City was to have posted the revised Housing Element for public review before closing for the weekend starting on March 5th. I received a message from Joanna Hankamer at 11:09 on March 5th that the agenda was delayed.

- **How addressed:** All agendas for public meetings were posted in compliance with the Brown Act. The dates and times stated would comply with the Brown Act. As Ms. Hankamer is no longer with the City, we have no further information about this event.

Conclusion:

When you come to the public and ask for our help but then don't make a good effort to provide us with the resources to participate, we question the commitment of the City in seeking community input. We should not have to chase down City staff to be able to participate. The City should make public participation as accessible as possible by ensuring that every resident is informed, and informed again, and that all stakeholders are at the table before moving forward with assessments and data and reports that claim to represent public interest.

We will not legitimize the Housing Element with our further analysis and feedback and demand more public input. We do not accept your findings as a true representation of housing needs in South Pasadena. Also, much of the data is over two years old. Much has changed. Much has changed.

- **How addressed:** The City attempted to keep the public informed of processes and to provide opportunities for input given the resources available to it. While more potentially could have been done in the past to encourage more involvement, we are unaware of any noticing that did not meet applicable codes. Due to extremely high staff turnover during part of 2021 direct outreach to certain groups was unable to be completed. It appears that those groups are now well engaged and able to participate in the remainder of the process. Their comments on the content of the element are well taken.

Josh Albrektson (May 2, 2022)

This Housing Element doesn't address the main problems HCD had with the October Housing Element. For everything related to the 2017 laws and the 6/10/2020 HCD memo there is no significant

difference between this draft and the October draft. It doesn't show how 65 to 70 DU/Acre is achievable under the base zoning of South Pasadena, it doesn't show how the highest inclusionary housing element in the state affects feasibility, and it doesn't address the timeline and how it takes multiple years to approve multifamily homes.

It also is unchanged in the Above Mod/Mod category even though there are multiple claimed units on hillsides and backyard tennis courts that due to environmental constraints homes can never be built.

It includes the three grocery stores and business park that SoPas was told to remove. And it goes from assuming 297 ADUs to 318 ADUs even though HCD told South Pasadena it should be around 10 ADUs per year. There also was none of the outreach performed that HCD told South Pasadena they were required to do and none of the public comments was address in the Housing Element. This Housing Element completely ignored all of the problems that HCD had with the October Housing Element and will be rejected just like that one was. Of note, I sent an e-mail on March 18th that was much more extensive regarding the October Housing Element. Everything in that e-mail still applies to this new Housing Element draft --

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed**: Program 3.f, Allow and Facilitate ADUs, Program 3.g, Monitor ADU Production and Program, Program 3.h, Back up to Address Shortfall in Anticipated ADUs and Program 3.i, ADU Amensty Program have all been updated to address HCD comments and provides a realistic path for the incentivizing the production of ADUs to meet the City's RHNA.

Delaine W. Shane (May 2, 2022)

Dear Honorable Mayor and Council Members:

I appreciate the opportunity to comment on the subject document; however, a frank discussion of what really is at stake beyond this documentation is even more important. South Pasadena cannot simply stand by and do whatever the State dictates on housing, while not equally judging the truly complex intricacies, relationships, and outcomes of water supply/drought, climate change, unequal economic/social justice issues, misguided actions that harm historic preservation, and minimizing fiduciary responsibility regarding the sale of Caltrans properties.

I fully understand the constraints that this subject document must adhere to as based on recent legal state mandates, and yet we cannot divorce ourselves from other planning and environmental areas that clearly interact with the proposed draft Housing Element. All documentation should be discussed in unison instead of separating the Housing Element from the General Plan Update, the Specific Plan Update, Zoning modifications, Environmental Impact Report, and even the already approved Climate Action Plan. It is a complex undertaking to plan the City's future when there are so many aspects to consider. All sides of this debate on housing must be heard; these plans are so vital to the City's development for the next 20 to 30 years in the long-term and even more so in the short-term within the next eight years.

My comments are divided into two sections: general perspective for your consideration and specific comments on the subject document for the planning consultants. Yes, the State long ago forcefully told our community that we residents must prepare for a freeway to be built through South Pasadena. We

stopped that transportation fiasco and now we must stop the outrageous and exaggerated RHNA mandate and the related state housing legislation that will shred the character of our city. We need to control our own destiny. That is true democracy.

South Pasadena needs more affordable housing—without question. Housing should not be about pleasing the State or the for-profit developers who focus on luxury units. South Pasadena housing should be planned and accommodated in a sustainable manner for our residents and for those yet to come at truly affordable prices. This planning needs to be within the context of a small city that is merely 3.5 square miles and that will be able to operate with sustainable infrastructure, environmentally supportive practices, and financially sound protocols for our residents (homeowners and tenants, rich and poor, and the entire spectrum of diverse ethnicities, religions, etc.). That planning effort is very difficult to do today with the State's stranglehold on local jurisdictions, yet we must strive to try together.

We cannot follow blindly in step with the State. As of this moment, only nine out of 197 jurisdictions have approved housing elements for the State's planning cycle (In South Pasadena Review. 2022. By Haley Sawyer, "Progress on Housing Element Plods Ahead," April 29th, page 13). We are not alone in this quagmire of overzealous and misplaced mandates, along with highly restrictive instructions/-requirements on what constitutes a compliant housing element.

A coalition (Mission – Livable California) is currently collecting signatures and asking for support to have a State Constitutional amendment approved by the voters in 2024 to return land use and zoning directives back to the cities and counties. Council Member Evelyn Zneimer is the only elected representative from South Pasadena that openly supports this measure. Why doesn't the whole Council

support this as well? Or, if not, why doesn't the Council push back more with the State and build its own coalition to fight the onerous RHNA mandate? Just because of one appeal that was destined to fail anyway does not mean that South Pasadena should surrender its rights to develop a more reasonable and accommodating expansion. South Pasadena, the fighter, stops after just one loss in a huge battle for control of its destiny? That's not the South Pasadena way that I recognize.

Here is the list of the jurisdictions and their representatives across the State that do support this proposed voter measure: Endorse - Our Neighborhood Voices. This coalition's principles dovetail perfectly with South Pasadena:

• Support housing as a basic right.

• Fight for truly affordable housing.

• Assure self-determination of local government.

• Preserve quality of life in our communities.

• Achieve smart and balanced growth.

• Respect lifestyle choices.

• Protect home ownership.

• Value the American dream.

It is time to collaborate with other jurisdictions and join coalitions to bring sense and true planning back to local control with respect to land use and zoning, and especially in all matters regarding housing in South Pasadena.

Thank you for your consideration.

Sincerely,

Delaine Shane

Delaine W. Shane

2003 Meridian Avenue

- **How addressed:** The commentor's frustration with the state mandated system is noted, and in receiving a RHNA that is challenging in the context of South Pasadena's small area and built-out character. The City explored all options in appealing the allocation when that opportunity was offered, but recent court decisions have made it clear that further legal action on the allocation is not available. Some jurisdictions have posed challenging the statewide basis of the RHNA allocations, but the City has not chosen to proceed in that manner. The City has been actively working toward complying with the complex web of new requirements and the RHNA allocation in order to adopt a compliant housing element as is required under the law.

GENERAL COMMENTS

This generic document does little to validate the excessive development scenario proposed for our small 3.5-square-mile community. Clearly the draft Housing Element is not dealing with today's reality. It is light on specific details concerning critical and defining zoning and planning standards and criteria. It simply notes that this critical information will be determined after the adoption of the Housing Element. Conducting public outreach and participation by the city staff and consultants should not be done this way. This strategy is top-down planning and prevents honest discourse between different views during the genesis of the Housing Element.

The Housing Element should be presented with all other related plans/zoning/design requirements together, so that the full portfolio of planning tools, strategies, and options can be understood and considered in the context of South Pasadena and its position on accommodating future growth.

Notice my statement in the previous paragraph as "in the context of South Pasadena and its position on accommodating future growth." It's about what WE want and not the State. That is a huge difference and an important distinction being made. For example, other than building new housing units, I do not have a real sense from the Housing Element what the City policy and priority is in retrofitting old office buildings for apartments or the real seriousness for educating property owners on developing Junior ADUs. Adaptive reuse of existing buildings and junior ADUs are mentioned in the Housing Element but just that and not much more. Modifying existing buildings can generate less carbon and greenhouse gas emissions over new construction and can also preserve the historic nature/character of the neighborhood where the buildings stand.

Briefly, I will state very obvious facts that cannot be ignored by the City or by the State, and especially not in the Housing Element.

- **How addressed:** Thank you for your comment.

Water Supply and Drought

No matter how we conserve, adding 2,067 housing units will have a significant impact on our current ability to supply water to all South Pasadena residents. Water shortages and rationing are now a reality. We will have less water and more costs by the various water districts that will ultimately be passed onto us residents.

California Department of Water Resources

Survey Finds Little Snow as Statewide Snowpack Drops to 38 Percent Following Record Dry Months (ca.gov)

Metropolitan Water District of Southern California (click on weblinks for full details)

Metropolitan Cuts Outdoor Watering To One Day A Week For Six Million Southern Californians (mwdh2o.com)

Metropolitan Adopts Two-Year Budget To Address Drought, Climate Change While Mitigating Impacts of Rising Costs, Lower Sales (mwdh2o.com)

Upper San Gabriel Valley Municipal Water District

Drought – Upper District

- **How addressed**: Program i.e. - Environmental Health is an integral component of supporting healthy living conditions and preventing fair housing issues that can result from concentrations of contamination. To encourage place-based revitalization through improved environmental conditions, the City will meet annually with water providers to identify funding opportunities to continue to implement mitigation measures at City water sources in San Gabriel and San Marino.

Climate Change

With water shortages/droughts, climate change will impact reservoirs as well. As the levels in our state and federal reservoirs continue to drop to historic lows, there will also be losses in energy levels related to generating hydroelectric power. Apparently, if you subscribe to Clean Power Alliance-SCE, for 100% Green Power, the power source does not rely on hydroelectric processes. However, if you don't subscribe to this service, you may find yourself having more black and brown outages in the future. Refer to: Power Sources - Clean Power Alliance.

Lawns, trees, and other vegetation will have to be watered under key restrictions and quite possibly lawns may be prohibited in the future if we fall within a persistent, severe drought. This will have to be balanced with the need for open space, parks, habitat preservation, as well as considering shading alternatives if more trees die out. It is worth a discussion and evaluation in weighing the growth patterns of the City amid increased impacts to these biological resources.

- **How addressed:** Thank you for your comments climate change will be addressed in the updated General Plan.

Social/Economic Justice

How will building so many luxury condos (while adhering to the state's mandate of density bonuses/inclusionary incentives) benefit or balance the social/economic injustices we have in South Pasadena? There are discussions on "housing mobility opportunities" in the Housing Element for those residents who are struggling from paycheck to paycheck. Except for getting out of substandard rental units, I am not clear as to what difference it makes where individuals with extremely low/very low live, so long as it is in South Pasadena. Repairing the units and allowing people to remain in them at affordable rents (with voucher assistance) and not uprooting them seems the better approach and less draconian. Conversely, is it possible that the Housing Element as it now appears could impact persons of color who qualify for such "housing mobility opportunities" but fail to remain due to gentrification. No one should be paying up to 50% of their income for rent, yet some of our residents do.

- **How addressed**: Program 2.b Affordable Housing Production identifies that the City will establish a Housing Divisions to help fund and build affordable units on sites in higher-income neighborhoods to facilitate housing mobility.

Historic Preservation

I have absolutely no idea as to how historic preservation will survive in this housing planning cycle. Overlays, zoning, development criteria, and design are for another day depriving us of thoughtful discussions about historic preservation, new construction, and possible alternatives. This is simply not transparent and is wrong to have this information withheld or not completed until after the Housing Element is approved or close to being approved. Though this is not the CEQA process, it really shuts down any initial opportunity to set draft policies within our community through collaboration and cooperation. We have a precious historic treasure trove of buildings, and we have a responsibility to be good stewards in maintaining this historic fabric and character of South Pasadena. That doesn't mean everything will be frozen in time. No, we must develop the downtown further, but in a manner that complies with federal standards and our vision of what direction South Pasadena will take: Rehabilitation Standards and Guidelines—Technical Preservation Services, National Park Service (nps.gov).

- **How addressed:** The commentor's statement is noted.

Fiduciary Responsibility/Caltrans Properties

The City and its third-party vendor must stay out of the property management business with the remaining Caltrans properties. Seriously.

Where is the funding source for the City to make such purchases?

Where are the checks and balances to ensure things will be operated and maintained properly?

My neighbors and I are completely against SB381. We live adjacent to or within a few doors down of many Caltrans properties. The views of the Caltrans tenants have also not been heard and are not reflected in the Housing Element. No decision, such as making the properties permanent rental, should be made without the full public participation and discussion with our neighbors, including Caltrans tenants. We support the recommendations made by the South Pasadena Preservation Foundation and want to see existing or previous tenants have success in buying their homes.

- **How addressed:** SB381 provides a way for housing currently owned by the state to be put into use again. It allows the City to be part of the process to ensure that such housing is made available. The City has chosen to move forward with evaluation with each eligible property on

a parcel-by-parcel basis. The housing element does not mandate that any one parcel be accepted by the City, let alone that all do. The housing element does not, nor can it, amend the provisions of the state law created by SB 381. The housing element creates a program to proceed under the SB 381 process. The housing element recognizes that these parcels are an important part of how the city will address its housing needs. However, it does not mandate and outcome on any specific property at this time.

Conclusion

South Pasadena doesn't need a boiler-plated, word padded State template to guide our City for the next eight years in housing development. Instead, South Pasadena needs to be a leader and examine its own resources, listen to its residents (especially renters who don't have a renter on the City Council and yet comprise some 50 to 55% of the population) on what is sustainable growth. South Pasadena also needs to collaborate with other jurisdictions and coalitions to fight the State on these RHNA numbers. If you haven't seen the Los Angeles Times today, one of its leading stories states: "California's population fell, again. But an inland boom could be turning things around." "Population growth remains strong in the Central Valley and the Inland Empire." This article requires a paid subscription, so I am including just a snippet. I am not suggesting that South Pasadena have no affordable housing units. It must. Just what can be determined as truly sustainable and not what SCAG or HCD wants.

- **How addressed**: Thank you for your comments.

SPECIFIC COMMENTS

Comments on Table VI-2 (Summary of Housing Programs for the 2021-2029 Housing Element)

1. Page 5, Program 1.a.—Energy Efficiency. "The City will also continue to encourage retrofitting existing housing units with innovative energy conservation techniques, such as active and passive solar systems, insulation, orientation, and project layout in an endeavor to further reduce dependence on outside energy sources." Why should solar systems continue to be encouraged by our City? While I am in favor of promoting renewable energy systems, more discussion on this one is needed. As noted on page 173 of the Housing Element: "In 2021, 95% of residents subscribed to the 100% Green Power option." That is in reference to the City's success in getting most of its residents to accept the Clean Power Alliance-100% Green Power. So, how does having an individual solar system on one's home improve that goal on energy efficiency from the City's standpoint? It is my understanding that the California Public Utilities Commission may be considering added charges on metering that may make it less cost effective for owners of these systems to get reimbursed when they sell their excess energy. Furthermore, manufacturing of solar panels is not carbon neutral, and there are environmental issues with disposal of older panels. From a financial standpoint, it may not make sense for some property owners to invest in this type of system, especially if they don't intend to stay in South Pasadena for a long time. Financing this type of system with some private installers may result in liens being placed on the properties that can be problematic during subsequent sales. Wouldn't it be more productive for City staff's time and efforts to focus on the other conservation techniques than on the solar systems? Perhaps, it is time to review the hastily approved 2020 Climate Action Plan and revise it so that it can also be properly interwoven into what is now being discussed in this element and the General Plan Update?

- **How addressed:** Thank you for your comment.

Page 5, Program 1.b.—Housing Acquisition. "The City will have priority to purchase the surplus properties after the existing tenants." My neighbors and I continue to object to this proposed action by the City via Senate Bill 381. This legislative piece was never thoroughly vetted by the residents, especially the Caltrans residents. The City has no ability or resources to take on the responsibility of purchasing many if not all the Caltrans properties within South Pasadena. We still wait for the two vacant former Caltrans properties to be converted into pocket parks. The whole process has been plagued with delays, neglect, and empty promises. The real intent we believe is to use these Caltrans properties with existing housing for permanent rentals with oversight from a third-party management firm. That is NOT what our neighborhood wants. We want existing tenants to OWN these properties. The City's policy should be to help the residents navigate and provide/seek funding if there are short falls in financing and not let the residents fail to secure their homes. That is why our community supports the South Pasadena Preservation Foundation's recommendations. These recommendations should be part of this section of the housing element. Managing rental properties by the City or more likely its contractor is not doable. The daily administrative duties and operations, the collections of rent and processing of vouchers, the complaints under an array of situations, the continual maintenance issues, the liability of injuries, etc. will be beyond the capabilities of the City to accomplish this monumental task without additional staffing and costs. A third party will minimize all these issues, like Caltrans did, to get the most out of the renters' money (and taxpayers too) and our neighbors who live next door to these houses and apartment buildings will be directly impacted through the neglect as what is the current situation. The City should act as a facilitator and "hand holder" for the tenants to get them approved by mortgage lenders and to be a point of contact for further advice, if needed. Program 1.b is simply a tremendous undertaking that the City lacks in being able to carry out and could be a financial disaster for us as a community. At the very least, the City should identify in this element, the projected costs of purchasing, maintaining, and operating these properties by the City (or a third-party designee) versus assisting the tenants to buy their homes and then helping them seek grants and loans to fix the housing units. The tragedy is that these were once quaint, working-class homes for hard working people. Caltrans took on the mantel of slum lord and we see the results of their cruel management.

- **How addressed**: See response above.

Page 6, Program 1.c.—Housing Rehabilitation and Code Enforcement. "The City will respond to tenant complaints regarding housing conditions and will proactively pursue abatement of substandard housing conditions identified in the 2022 survey (Table VI-26) or as subsequently identified to reduce displacement risk of tenants living in currently substandard housing." I completely agree with this statement. No one should live in substandard housing; however, I see no text in this housing element that protects the tenant when they make a complaint. This section needs to state how the tenant will not be evicted while the landlord makes good on complying with code enforcement's correction/abatement orders. Will the landlord pay for the tenant to be in a motel until they can move back in upon approval of code enforcement if substantial corrections are required? How will potential retaliation be prevented? Can the landlord use this as an excuse to "remodel" the unit and then increase the rent prior to the tenant moving back in? I believe that renters comprise well over 50-55% of South Pasadena residents. There needs to be more specificity in this section to ensure that existing tenants who have the ongoing misfortune to occupy substandard housing units will not be evicted or retaliated against when they register a complaint with code enforcement.

- **How addressed:** The commentor appears to be addressing concerns about retaliatory actions by landlords against tenants who complain about substandard living conditions. Such retaliatory behavior by landlords is illegal under state law. The city supports challenging such unlawful behavior with referrals to the Housing Rights Center (HRC). These efforts are addressed through Program 5.a.

Pages 6 and 7, Program 1.d.—Assisted Housing Unit Preservation. "The City will maintain and monitor a list of all low-income housing units in South Pasadena that are subsidized by government funding or developed through local or state regulations or incentives." …. "If conversion of units is likely, work with local service providers as appropriate to seek funding to subsidize the at-risk units in a way that mirrors the HUD Housing Choice Voucher (Section 8) program. Funding sources may include state or local funding sources." This program is therefore to show compliance with the RHNA numbers for those residents that are earning extremely low/very low income (1,155 housing units). This program will undoubtedly require the work of two or more FTEs (full time equivalent individuals, either employees or contractors). This program should not be funded by the General Fund, but by the State given such high numbers. If this must go through the General Fund, then the Housing Element should indicate the approximate cost to the taxpayers to implement this State mandate. How will this program be structured so that it can be meaningful to those who truly need such services rather than it de-evolve to just list some numbers (with or without verification) and then hand out fact sheets rather than be proactive and collaborative? After all, there are a lot of programs proposed by the City and not all can be carried out and monitored with a small staff. We cannot pay an endless amount to outside contractors. On Page 7, the last paragraph in the program explains what happens if owners sell their properties before the 55-year (for owner occupied units) and 45-year (for rental units) requirements that ensure such properties remain affordable for their set periods of time. Two questions come to mind. First, if a developer is relying on Program 3.d (Enable Parcel Assemblage) to build multi-housing units and one or more of the small properties are under Program 1.d (Assisted Housing Unit Preservation), does the owner/seller of the existing property still have to pay any money beyond the affordable sell price to the City? Several sad situations exist for why owners of affordable housing may have to sell, such as the death of the primary wage earner, the aging out of the owner, divorce, etc. but under the scenario I have presented here, it appears that only the City and developer would reap the monetary rewards and not the property owner. Second, does the placement of a "roll-over" restriction for another 45-55 years to protect at-risk units where the property owner sells the units prior to the first-time frame legally sound? I am all for ensuring affordable housing, but is there a legal precedent for this "roll over" restriction that essentially restarts the entire period again or just maintain the remaining affordable years left by the previous owner. It just sounds particularly onerous and not a true legal nexus. Could this "roll over" restriction place the City in legal jeopardy?

- **How addressed:** Thank you for your comment.

Page 7, Program 1.e.—Environmental Health. This program needs to be expanded to include air and soil contamination testing and mitigation on properties (especially those with existing structures) to undergo rigorous evaluation before constructing new housing units. I still go on record that the evaluation of buried soil contamination at the Seven Patios Project site was unsatisfactory and should have had more rigorous testing.

- **How addressed**: The commentor's position regarding a past project is noted. The data evaluated from CalEnviroscreen 4.0 showed that South Pasadena had cumulative scores for air pollutants below the thresholds for further action. Parcel level site analysis is done at the time of individual project evaluation, not at the housing element level. The analysis performed did show a threshold for further analysis for water contamination. Program 1.e was included to address the water contamination issues. The city has already begun to address the water contamination issues through remediation activities, seeking reimbursement through legal action against responsible parties, and continued monitoring of water quality. These are addressed through Program 1.e.

Page 8, Program 2.a.—Provide Technical Assistance for Projects with Affordable Housing. The second paragraph should become the first paragraph in this discussion and the number one priority of this program with these edits: "The City will reach out proactively to developers of 100% affordable housing to identify and vigorously pursue opportunities to the maximum extent feasible on an annual basis. The City periodically updates applications and materials, and provides application forms and materials on-line at the Virtual Planning Desk to better assist housing project applicants and for implementation consistency." Still on Page 8 of this program contained within the column entitled eight-year objective with this edit: "Expand housing mobility opportunities through affordable housing in locations distributed throughout the City and encourage affordable development in high resource areas by facilitating timely review of development proposals…." This edit reflects more accurately and explicitly Goal 2.0. Last comment for this program within the same column: "The City's objective is to assist with 100 applications across all income levels during the 2021-2029 planning period. Update materials by June 2023." Clarification of this statement is needed. Does the City's objective for the 100 applications mean just in receipt of or does it seriously mean processing them and seeing these through completion as built units? What if no applications are received at the extremely low/very low income levels? What then? And if high numbers of applications are submitted within a short timeframe, which income level(s) applications will be given the highest priority?

- **How addressed:** Thank you for your comment, please check back with the City's Virtual Planning Desk to find out about housing project applications.

Page 10, Program 2.e.—Facilitate Density Bonus for Projects with On-site Affordable Housing. "The objective is to approve at least 600 affordable units during the planning period through density bonuses to facilitate mixed-income projects, and support expanded housing mobility opportunities for lower-income households." Of course, streamlining approvals means excluding CEQA discretionary action and making it ministerial. This separation rather than complete discussion of the Housing Element, the General Plan Update, Specific Plan Update, Zoning Modifications, Design Requirements, and Climate Action Plan combined is extremely problematic. It is precisely at this ambiguity juncture where we are concerned that with the loss of CEQA input, our voice in how the development is proposed, designed, and pushed through will be lost.

- **How addressed:** Program 2.e has been updated to address HCD comments.

Page 10, Program 2.h.—Incentivize Special-Needs Housing. This program needs to ensure that such housing be distributed throughout the City. Once such buildings are erected, what will be the mechanism to ensure that the operators of said housing will be good stewards and good neighbors?

- **How addressed**: Program 2.h has been updated to address HCD comments.

Page 12, Program 2.j.—General Plan Affordable Housing Overlay and Program 2.k—Affordable Housing Overlay Zone. These overlays should be made available now for public review. One will be adopted by the General Plan approval date and the other no later than October 15, 2024. That does not allow for much public discussion or flexibility in revising such overlays, as needed.

- **How addressed**: Program 2.j has been updated to address HCD comments.

Page 12, Program 2.l.—Facilitate Affordable Housing on City-owned Property. "This process will begin with a review of assets to create a City-owned site affordable housing inventory (will include list of surplus properties) by June 30, 2023." Shouldn't the public know what the City's assets are that could be considered for public housing first before this Housing Element is adopted? We have very little open

space/parks in several parts of our City. Some of these assets also need to be utilized for that purpose. As a side note, it is difficult to hear that the City doesn't even know to the full extent what properties it owns outright, rents, or has easement rights over. And yet, the City expects to deal with all the bureaucracy, financial peril, and personal involvement that will entail encouraging development and managing Caltrans properties. Simply unbelievable.

- **How addressed:** Implementation of a City-owned affordable housing sites inventory will occur after adoption of the Housing Element. Please check back with the City after Housing Element adoption for status updates of this program.

Page 13, Program 3.a.—Rezone and Redesignate Sites to Meet RHNA. This program is nothing more than promoting refill parcels or redevelopment parcels-still a controversial approach for generating more affordable housing. If a property owner wishes to voluntarily participate, then it is not an issue. This program should not be a planning tool in which the City decides which properties are not at their highest and best use. Nor should eminent domain be employed for this program.

Still on Page 13 under this same program: "The types of standards and processes that will or may need revising include height limits, open space standards, parking requirements and findings for design review. The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays (see Programs 2.j and 2.k) in the General Plan and Zoning Code are also addressed by this program." These statements should be discussed publicly now and not near the end of the General Plan Update/rezoning identified as being October 15, 2022. These other documents that the consultants have been writing about will be hundreds if not thousands of pages long collectively. Again, it is the State driving this deadline and that is why the City needs to push back. Height limits, open space, and parking are very critical issues to our neighbors and our community. And we are asked to sign off on this Housing Element without understanding what the City will define as its new standards. Ultimately, we will lose our recourse to remedy mistakes because CEQA will no longer come into play. This is wrong and not democratic.

- **How addressed:** This program is required due to the RHNA allocation to the City. It is being revised, and will demonstrate compliance with State law, including efforts to move toward objective standards and non-discretionary processes for housing.

Page 14, Program 3.b.—Mixed-Use Developments and Adaptive Re-Use. We don't have information on the zoning changes at this point. We need to see how the zoning within the City will change to support the Housing Element.

- **How addressed:** Parcel level zoning detail is not required for approval of a Housing Element. The zoning for particular parcels follow the policy level determinations under the Housing Element. Pursuant to Government Code section 65754(b), City's zoning code is required to be completed within 120 days after the Housing Element has been amended by the City Council.

Page 14, Program 3.c.—Replacement of Lost Units from Residential Demolitions. "Identify affected demolition proposals based on maintaining an inventory of affordable units and require replacement housing in compliance with State law to reduce displacement that occurs as a result of demolition and enable residents to remain in their community." This needs clarity to ensure protection for the residents. Does this mean that before existing affordable housing is demolished, the current tenants will be guaranteed replacement housing before demolition commences? If so, who is responsible for their temporary housing costs (which might last for a year or so)? If not, how can you make a statement that

residents will be able to remain in the community if they are amongst the first "casualties" of demolition? Vacancy rates in South Pasadena are low even for rental units that moderate income individuals can afford. What about the extremely low/very low income population?

- **How addressed:** Please refer to California Government Code Section 65915(c)(3).

Pages 14-15, Program 3.d.—Enable Parcel Assemblage. What if an adjacent property owner does not wish to sell their home to the developer? Will the City then proceed to take the property through eminent domain to ensure that the RHNA numbers are being met? With all the incentives the City is proposing to give to the developer, such as more height, additional stories, waive lot merger fees, and perhaps a lessening of parking requirements in areas that are already built out, absolutely no consideration is given to the residents. There is no acknowledgment from what I can tell from the Housing Element on how much our neighborhoods already suffer and that with new development will be compounded such as deteriorated streets and limited to no parking. The developers cannot fix our current problems. Does the City expect that the character of our small City will remain unchanged with this over-the-top densification? How will the City prioritize the historic homes on the inventory list throughout the City? Many homes have been modified over the years. So, will the City follow the tactic of Caltrans and deem that these historic homes can therefore be demolished? And again, what can other neighbors say about it, when it has become a ministerial action with no CEQA involvement because it fits with an ambiguous housing element with no zoning modifications presented to us at this time to discuss and consider?

- **How addressed:** Program 3.d has been updated to address HCD comments.

Pages 15-19 for Programs related to Accessory Dwelling Units (ADUs). I could not find anything about short-term rentals (e.g., AirBnB). Such housing stock is detrimental to achieving affordable housing goals and objectives. One or more of these programs need to explicitly state the policy of either no such rentals permitted or a set limit with specific restrictions in a policy/ordinance. I am certain there are already residents that have this type of operation in service, so it is important to have a dialogue to see what is most reasonable and fair.

- **How addressed**: Short-term rental analysis will be included in the City's General Plan update.

Page 19, Program 3.m.—Implement SB 9 and SB 10. Isn't SB 10 optional for the jurisdictions? The text indicates that SB 10 zoning amendments would be considered by December 2024. Why the delay? All these pieces need to be examined now. Is the City piecemealing this planning effort? The Housing Element needs to focus more on potential adaptive re-uses of existing commercial buildings and junior ADUs. They are mentioned but their actual potential is not really examined or prioritized.

- **How addressed:** Jurisdictions are not required to adopt or evaluate SB 10. The timeframe stated for examining SB 10 is to allow sufficient time for analysis and community outreach should the City decide that its provisions would be beneficial for housing production.

Page 20, Program 4.a.—Land Use Controls-Emergency Shelters. What does the BP zone mean? I was unable to find the definition in the Housing Element. Location of such shelters are important and the zoning of them should be discussed now and not one year after the Housing Element is approved.

- **How addressed**: BP refers to Business Park Zone.

Page 20, Program 4.b.—Land Use Controls—Transitional and Supportive Housing/Low-Barrier Navigation Centers. This is a euphemism for half-way homes. The City is planning to revise the

Municipal Code so that these homes can be placed without discretionary CEQA review in areas zoned for mixed use and non-residential zones permitting multifamily uses within two years after the adoption of the Housing Element. I know this is also a controversial topic, but it needs to be discussed now. All the "pieces" of the planning jigsaw must be available for people to understand, discuss, and voice their opinions.

- **How addressed**: Program 4.a includes a program to update the zoning designations for emergency and transitional housing. These amendments will occur after the Housing Element is adopted.

Page 21, Program 4.c.—Land Use Controls-Flexible Zoning Regulations. Does this flexible zoning program also include those centers (i.e., half-way homes) in Program 4.b?

- **How addressed**: Program 4.b includes a program to update the zoning designations for emergency and transitional housing. These amendments will occur after the Housing Element is adopted.

Page 21, Program 4.f.—Senate Bill 35 Procedure or Policy. This draft policy on streamlining "eligible" projects per the cited California Government Code needs to be available for us now to review and not by the end of the year when the Housing Element is already adopted.

- **How addressed**: California Senate Bill 35 (SB-35) was signed by Governor Jerry Brown on September 29, 2017 and was effective January 1, 2018. SB-35 applies in cities that are not meeting their Regional Housing Need Allocation (RHNA) goal for construction of above-moderate income housing and/or housing for households below 80% area median income (AMI). SB-35 amends Government Code Section 65913.4 to require local entities to streamline the approval of certain housing projects by providing a ministerial approval process. Please refer to the Government Code Section 65913.4 for more information.

Davis White (May 31, 2022)

To whom it may concern,

The California Department of Housing & Community Development (HCD) recently published a letter in response to Temple City's implementation of Senate Bill 9 (SB 9) which has sweeping implications for other jurisdictions in this process. The letter focuses on the city's ill-founded attempt to reduce the intensity of land use for SB 9 projects without any attempt to concurrently increase intensity elsewhere, as required by the Housing Crisis Act of 2019 (HCA). Any change in intensity of units or size without counterbalancing affects feasibility. HCD has found this violates state law. Temple City's SB 9 ordinance—and HCD's response—also contains a laundry list of don'ts which may affect a jurisdiction's Housing Element compliance. Specifically, the letter called out Temple City's use of square footage restrictions, height and story restrictions, courtyard requirements, parking limitations, LEED standards, underground requirements, and even affordability deed restrictions. All told, such requirements for SB 9-related projects which go beyond standards for other projects may be construed as governmental constraints.

Jurisdictions will have to identify and justify such constraints in their Housing Elements. Lastly, the letter stresses that a jurisdiction's implementation of SB 9 is covered by state laws other than the HCA and State Housing Element Law. This includes, but is not exclusive to,

State ADU Law, AFFH, and Anti-Discrimination in Land Use Law. How a city implements SB 9 has wide-reaching considerations. Jurisdictions should be fully aware that SB 9-related projects are not separate nor exempt from their ordinary zoning laws and instead should be included within existing codes. The point of SB 9 is to give homeowners the means to increase the density of their properties. It is not a dead-end in state law.

Attached to this email is HCD's letter to Temple City for reference.

Sincerely,

Davis White

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Davis White he/him

yimbylaw.org

(415) 298-0788

- **How addressed:** The City plans to review the SB9 urgency ordinance adopted in December 2021. Such review will allow for review of the standards noted and an implementation process to be addressed. Although this process has been delayed due to other department priorities, a revised ordinance will be developed in consideration of more recently issued comments and interpretation of SB9's provisions.

Josh Albrektson (June 20, 2022) (Twitter Post)

South Pasadena is required to show they have enough zoning to allow 2,067 homes will be built over the next 7 years. They just released a Housing Element that shows where they claim the "Future homes" will be built. Me and @taxingainteasy are gonna take you so see them.

- **How addressed:** Sites included in the Housing Element must allow for and be suitable for residential development. Inclusion in the Housing Element is not a guarantee of residential units being built on a site.

To start with, South Pasadena claims that this entire mountainside will be redeveloped with homes. They have no plans to actually do it and never actually would, but they still make the claim.

(Blue dot is where I am standing for video)

In fact, in the Housing Element they even specifically state that it will always be open space at the same time they claim housing will be built on it. They had these same sites in October and were told to remove them by HCD, but they are still there.

You really don't get a sense of how steep this mountain is until you actually go up there. This will be the first and last time I go up there. [He describes location of and road in relation to estimated "45 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 65 homes are going in this area (25+40)]

This is another place where they claim that homes will be built on a mountainside with a 60 degree incline road. Blue marks where I am standing for the video. [He describes location of housing sites in

relation to estimated "70 degree" slope and presents questions regarding feasibility of housing development on the hillside. Implies 11 homes are going in this area (7+4)]

Here is the video for reference.

- **How addressed:** All APNs ending in 900, 901, 904, and 905 have been removed. APN 5308032902 has also been removed. 5312016015, 5312016014, 5301028036, 5301028035, 5301028034, 5301028054, 5301028053, 5301028052, 5301028051, 5301028050, 5301028049, 5301028055, 5306006024, 5306006025, 5306006053, 5306006048 have also been removed because they would have to have the road developed.

SoPas claims that every major grocery store will be turned into low income housing. This Ralphs which serves most of San Marino and Alhambra and is the only grocery store around will be 133 homes, even though the owner never responded to any e-mails from SoPas. (Sound on) Video says: "Does this Ralphs look like it's about to go out of business? Looks pretty busy to me"

- **How addressed**: Ralphs and Vons have been removed from the inventory and Pavillions remains included and is counting the parking lot and not the whole building.

This SilverLake Ramen is actually about to open and at the last City Council meeting the mayor talked about how responsive the staff was to get the permits approved when it hit a snag. But According to South Pasadena this will be torn down in 7 years and turned into 263 homes.

Not only that, but this entire complex is planning to do massive renovations this year. In order to be included as a low income site you have to show that the current use is likely to be discontinued in the next 7 years. You don't spend millions on buildings to tear them down.

Speaking of grocery stores undergoing renovations, SoPas was told to remove this Pavilions from the list. SoPas is claiming they talked to the owner and he now wants to tear it down and build housing. SoPas will not give me any evidence of that conversation.

- **How addressed**: Only the parking lot portion of Pavillions is being included in the land inventory. Development would include ground floor parking and residential above.

Here is HCD telling SoPas in December that these sites should be removed, but they are still there.

This was also featured in an amazing article by @RegJeffCollins with follow up articles by @publiceditor

On a related note, SoPas makes all kinds of claims in their Housing Element for communications with owners, but they don't publish them and have repeatedly refused to show them when asked. I have even put in PRAS and 210 days later I have yet to get a response from SoPas

See these power lines??? They are the main power lines that got from a power plant and supply most of the power to SoPas, San Marino, and Alhambra. South Pasadena claims that 15 homes will be built under these high voltage power lines.

But not only that, they also claim that they will move their Public Works yard here and build 34 units at that site. I am sure Edison is totally cool with storing heavy duty trucks under high voltage power lines. We will just shut down power for a year when it is built.

- **How addressed:** This parcel is 2.73 acres and owned by the City. The southern portion of the parcel is not underneath the overhead lines. The 15 units assumed for this site were anticipated to be able to be developed on this southern portion of the site.

This is the parking lot for Rite Aid and other stores in a shopping complex. South Pasadena claims that the parking lot is not used for businesses. They would be shocked to learn there is a tunnel going strait from the parking lot to the businesses.

Rite Aid would also probably disagree with the assessment that the parking lot is not used for their business.

- **How addressed**: This site was removed from the inventory. Appendix A says the parking lot doesn't provide required parking for the commercial uses to the west meaning that parking doesn't address parking spaces required to be provided by the City.

See this McDonalds??? It is one of the nicest McDonalds I have ever been to. No response from the owner, but South Pasadena claims that they will be turned into 47 new homes.

- **How addressed**: This site was removed from the inventory.

You might recognize a lot of these sites because they are almost unchanged from the sites that South Pasadena submitted over a year ago. They were told at the time most were not eligible, but they are still there.

Now, let's go to some of the little sites that SoPas claims will be housing. It is obvious that they just pulled these from a random computer program and never even looked to see if they were valid. This is my thread from the first draft they had.

They have lots that claim a driveway will be built on a 6 foot strip of land up into the hills.

Does this look like a future driveway up into the hills???

Random street next to high school is apparently going to be a home.

Street demonstration by @taxingainteasy

This home (red) and this persons backyard (blue) will be torn down and turned into homes.

I bet this home doesn't know it is going to be torn down.

15 foot wide strips of land are apparently potential future homes.

Some dudes tennis court(red) and the main walkway connecting Monterey Hills and the High School (blue, called the snake trail) are both supposed to be housing.

This lot has approved plans for a pocket park that is supposed to be built this year. SoPas also claims it will be a home.

This thin strip of land is supposed to be a home.

Sometimes you have random strips on land in the middle of the mountain.

Not Kobe!!!!! This building is half a block from the train station. SoPas claims it will be torn down and replaced with apartments at 70 DU/Acre. The only problem is there is a 25 foot height limit and one parking spot per bedroom minimum parking requirement.

- **How addressed**: From Appendix A: "Existing use is retail commercial buildings and parking lots behind. All four parcels have the same owner. The owner is interested in consolidating the four parcels, adaptive reuse of historic storefront, and developing residential uses on this site. There is potential for redevelopment of the site based on underutilized surface parking, recent project trends and active economic reinvestment in the area. This site is centrally located near transit and services."

Finally, Krispy Kreme. This is not being torn down, we are just happy it is here.

This list is just some of the worst examples from the Housing Element. I don't include how South Pasadena enacted the highest inclusionary housing ordinance in the state to make sure no buildings will be financially feasible, in part because you cannot take a picture of that.

BTW, if you are looking for who to blame for the Housing Crisis,

@GVelasquez72 is in charge of @California_HCD. Under his leadership countless examples like the ones above have been approved. Like Vista being allowed to claim their 10 year old city hall.

You also have @Jason_Elliott and @CaHousingGuy who have yet to refer a single city for prosecution for a lack of compliant Housing Element, even ones that are openly defiant. Jason claimed that Newsom was going to hold cities accountable.

ADDITIONAL NOTES

Outreach to low income housing providers: Need to add reference to City outreach to Hollywood Community Housing Corporation to explore possibilities of partnerships and to understand the needs of LI housing providers.

Site 9 - (Yards): The site identified has been further examined and seems not to be feasible. Change on the notes to say that the current CIP includes a comprehensive assessment of City-owned facilities that may be suitable for relocation of the Yard, in order to vacate the property for an affordable housing project.

- **How addressed:** This site is a city owned site and the current CIP includes a comprehensive assessment of City-owned facilities that are be suitable for relocation of the public works yard, in order to vacate the property for an affordable housing project. The City will remediate any environmental constraints on this site prior to development for residential.

Josh Albrektson (June 21, 2022))

There are a lot of amazing claims made for the low income sites in this new Housing Element. In March before it was published I asked Angelica if she could share anything that will be used to claim a site is suitable and Angelica refused to send anything over (See below) The day after the new Draft Housing Element was published I asked Angelica for specific things related to the claims made in the Housing Element. She refused to send them over. I filed specific PRAS on May 11th for communications with the single family homeowners that they claim will develop in sites 14 and 15, any contact with Edison over the moving of the Public Works yard beneath the power lines for Site 9, the new communications

with Vons and Pavilions about owner interest in developing housing (sites 20 and 21), and communication with this YMCA board member for site 23. These were not broad PRAs and should have returned 1-3 documents each, documents that Angelica should have easy access to. South Pasadena has not filled a single one of these PRAs despite multiple requests. South Pasadena is making claims in their housing element about low income sites and deliberately making sure the public cannot examine the validity of these claims.

- **How addressed**: The commentor's statements regarding the request to produce documents are disputed by the City. The City endeavors to comply with all PRAs through a process monitored by the Office of City Clerk. The city is unaware of any outstanding requests from the timeframe noted, and has provided all non-exempt, responsive documents to the respondent in this context in the city's possession. Since this comment, the city has responded to several other PRA request from the commentor.

Angelica Frausto-Lupo (March 14, 2022)

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Friday, March 11, 2022 8:00 AM
To: Margaret Lin <mlin@southpasadenaca.gov>; Angelica Frausto-Lupo <afraustolupo@southpasadenaca.gov>

Subject: Can I get some information

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe. With the Housing Element release coming up I was wondering if I can get some information. I'm asking for it by e-mail because it would be much easier for you guys than more extensive PRAs. All of this information should be easy to obtain. 1. How many ADU building permits were issued in 2020 and 2021?? 2. Can you give me a list of projects that have turned in applications that the IHO would apply to since it was implemented?? I don't need anything extensive, just the address and number of proposed units in each project. 3. The evidence for each low income site in the Housing Element that you are using to claim as substantial evidence that the current use will be discontinued?? Margaret knows what I am talking about for this stuff. Thanks.

- **How addressed**: The City is following AB 215 requirements for releasing draft versions of the Housing Element for public comments.

Josh Albrektson (June 30, 2022))

South Pasadena just e-mailed a comment letter to residents 8 days before the HCD letter is due. It is an incomplete document and even being somebody who knows housing law it is hard to fully comprehend. This is not real community outreach. Because I am off this week I should be able to provide a comment on some of the things in that letter that is misleading/false by the end of the week. I will include one thing here. " Proposed revisions in the section under Historic Land Development Patterns (approximately page 94) ahead of the sentences about the height limit initiative: The City does not have any growth control or management policies in place, and has not historically," This is just flat out wrong. They enacted the 45 foot height limit in 1983 and also enacted a slow growth policy placing a cap on 60 new housing units a year. They did this in part because Asian people were moving to South Pasadena. They also banned minorities from owning homes until 1965. Here are articles from the LA Times in the 1980's describing South Pasadenas growth restrictions. I have pulled out the relevant paragraphs and

italicized them. https://www.latimes.com/archives/la-xpm-1987-10-25-ga-16043-story.html Minorities, Growth Like other cities in the western San Gabriel Valley, South Pasadena, which covers less than 3 1/2 square miles, has experienced both a significant influx of minority residents and a drive to build. Almost a quarter of the city's 24,400 residents are Asians, according to city officials. Fearing that South Pasadena is losing its character as a typical American small town of single-family homes, residents have battled plans for condominiums and major commercial projects. In 1983, voters rejected a proposed twin-tower office building that had been unanimously supported by the City Council. Then, after Simmons and Getchell petitioned for a ballot measure, voters imposed a 45-foot height limit on new construction. Now Simmons is leading a similar initiative drive to restrict minimall construction in the city. Cap on New Housing Last year, the council, under pressure from citizens' petitions, voted to place a cap of 60 new housing units a year in the city. https://www.latimes.com/archives/la-xpm-1988-11-28-me-363-story.html But city leaders say South Pasadena and its old-fashioned way of life are protected by a community-nurtured resistance to change. South Pasadena was one of the first cities in the region to adopt a slow-growth policy. In 1986, faced with a proliferation of condominium complexes and apartment buildings in the southern part of the city, as well as a voters' revolt, the City Council imposed a 60-unit annual limit on new multifamily developments. "We've protected ourselves pretty well," Woollacott said. Static Population The city's reluctance to build is reflected in population statistics. The population in neighboring cities has ballooned, mostly with new arrivals from Asia, but South Pasadena's has increased by an average of only 84 people a year since 1970. While the city was keeping a lid on new apartment buildings, slowgrowth activists turned down a string of proposed commercial developments, using intense political pressure or the initiative process. For example, in 1983, when a local merchant proposed to erect two multistory office buildings, angry residents petitioned for a ballot measure limiting the height of new construction. The measure won, and the so-called "twin towers" died a sudden and unlamented death. In recent months, two major projects have also succumbed to slow-growth sentiment. First, developer Thomas Stagen withdrew a plan for a 150-suite hotel on Fair Oaks Avenue, citing the community's "virulent opposition" to the project. Then, the City Council, acting as the Community Redevelopment Agency, scuttled a move to declare 74 acres of prime commercial area in the city a redevelopment area, after rebellious local merchants displayed signs portraying the council as a big octopus, seeking to control the city. In 1989 led by a local NIMBY Group SPRIG South Pasadena began implementation for a new general plan that downzoned the city from having a capacity of 60,000 to 25,000. LA Times article at the start: https://www.latimes.com/archives/la-xpm-1989-08-27-ga-1552-story.html General Plan update that includes a excerpt from the Task Force from 1990:(page 13)

https://www.southpasadenaca.gov/home/showpublisheddocument/220/636721709083330000 As the new decade begins, however, South Pasadena is faced with the twin threats of burgeoning multi-residential growth and continued deterioration of its commercial areas and business tax base. South Pasadena did not allow minorities to own houses. In 1964, a latino USC professor was allowed to buy a home because they mistakenly thought he was Native American. There is a TON more racist things in this article that South Pasadena did such as banning black children from the community pool and blocking off a street that connected them to the Latino El Sereno, but those were not housing related. https://www.coloradoboulevard.net/when-south-pasadena-was-a-sundown-town/ Housing In 1964, Manuel Servin, a Mexican-American professor at USC, managed to buy a house in South Pasadena, even though Mexican Americans were specifically restricted from doing so. Native Americans had no restrictions placed on them and City officials mistakenly approved his purchase in South Pasadena. Shortly thereafter, in the mid-sixties the Federal government provided funding for affordable housing with the Altos de Monterey development which brought more racial diversity to the area. Many communities adjacent to South Pasadena did not share the same racist past. El Sereno, Highland Park and Alhambra were far more multi-racial. This created the basis of still more examples of racially divisive attitudes in residents and more law suits against the City of South Pasadena.

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Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed**: The City is following AB 215 requirements for releasing draft versions of the Housing Element for public comments.

Josh Albrektson (June 30, 2022)

I'm gonna send my comments as I write them because SoPas dropped this letter 8 days before the deadline for HCD to make their findings.

Comments on Responses to HCD Preliminary comments.

1A. City needs to remove all sites from Table VI-44 that have backyard tennis courts, current homes, plans to be a pocket park, sites that do not exist on the APN map, and ones that are trails that are used to get to the high school.

- **How addressed:** The sites included in Table VI-44 that are on slopes are all on slopes less than 20 percent and are developable in accordance with the City's hillside ordinance. Additional detail about projects approved on slopes in included on Page 168 in blue highlighting.

1B. The Los Altos housing development covering SouthWest South Pasadena was done in 1965. Since that time there has not been a single new road built in the mountains of South Pasadena. There have been lots developed, but all of these lots are on existing roads. All lots that do not have road access should be removed, regardless of the slopes.

Page one contains a list of all sites by APN which should be removed.

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/ edit?usp=sharing

You all have seen the videos but you can see how unrealistic it is to claim a road will be built down this hill.

https://twitter.com/JalbyMD/status/1538986717599830016?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

- **How addressed:** This site was removed from the inventory.

1C. More than 50% of RiteAids business comes from people who park in the parking lot. You cannot just claim "This will be resolved." And the parking lot was not for sale, the whole site including the Rite Aid building was sold about 8 years ago. It was not just the parking lot.

See how many people are using the tunnel to get to the parking lot:

https://twitter.com/JalbyMD/status/1538992058236407808?s=20&t=vn8iBXZzAb-xOVD-Rg-HHQ

- **How addressed:** The Rite Aid sites has been removed from the inventory.

2A. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

- **How addressed**: Program 2.e has been updated to address HCD comments.

2B. The City talks about the single family homes in the South West of the City and how ADUs would help increase housing on those sites. South Pasadena enacted a ADU ordinance that made that area a high fire zone and instituted many restrictions so that ADUs cannot be built in that area. There is a e-mail from Reid Miller of the HCD ADU team to Liz Bar-El talking about and this included in the 5/21/21 e-mail sent out by Paul to the City. (see attached email)

- **How addressed**: The City will comply with state ADU regulations and coordinate with. local fire and safety requirements for allowing future ADUs.

3A. Sent out different e-mail quoting the LA Times articles from the 1980's about how "South Pasadena was one of the first cities in the region to adopt a slow-growth policy." And banned minorities from buying homes until 1965.

- **How addressed**: Thank you for your comment.

3B. "The City will continue to include projects in the City's Capital Improvement Program (CIP) that develop infrastructure which supports housing for lower-income residents, and provides transportation facilities for those without access to vehicles."

- **How addressed**: The ongoing evaluation of CIP needs and the action taken on May 23, 2022 does not negate the program in 3B to pursue transportation facilities for people without vehicles.

On May 23rd South Pasadena decided against implementing bike lanes in the city and instead used the money to expand a one lane road of Orange Grove to a two lane road at a cost of $500k in order to make it easier for people to get on the freeway. As part of the Housing Element South Pasadena should commit to implementing the adopted 2011 master bike plan by 2025.

Link to them rejecting the bike plan for the road widening:

https://twitter.com/ActiveSGV/status/1528818927588937728

Adopted but not implemented 2011 Bike Plan.

https://www.southpasadenaca.gov/home/showpublisheddocument/1793/636721709083330000

- **How addressed:** The particular project made reference to on May 23, 2022 has a long history associated with it and the Council used their independent judgment as to *that* location, not as to bike lanes in general as the comment would suggest.

  The bike plan is a more accurate reflections of the city's commitment to multimodal transportation, and is properly referenced in other elements of the General Plan, rather than the housing element. It is included in the draft GP due to be released soon.

3C. Regarding Program 2.e and the IHO increasing the supply of affordable housing. IHO makes every building economically infeasible so they will not be built and SoPas cannot claim it will help spread affordable housing through the city.

- **How addressed:** Program 2.e has been updated to address HCD comments.

Josh Albrektson (July 1, 2022)

5A. Site 18 cannot be developed without destroying the McDonalds drive through in site 17.

- **How addressed**: This site was removed from the inventory.

5B. Please ask to see the last contacts of the City with sites 3 and 6. What I have received from my PRAs implies both sites are not viable, with site 3 specifically telling the city that the IHO means his project can no longer work.

- **How addressed**: Owner is interested in the development of high-density residential housing and has submitted an application for a total of 8 market-rate units on the three parcels.

5C. Almost all sites are in locations where commercial projects can also be built and the probability of that happening is not taken into account at all. In the case of Vons and Pavilions, sites 20 and 21, that is actually happening with both undergoing extensive renovations in 2022. (Pavilions now and Vons planned)

- **How addressed:** Site 21 was removed from the sites inventory. Site 20 remains included due to the current renovations being minor in nature and would not preclude redevelopment of the sites. In addition, the only portion of Site 20 being counted is the parking lot and redevelopment of the parking lot would include ground floor parking with residential above. It was also stated by participants at the Developer Forum on August 15, 2022 that the City has sufficient parking and should reduce parking requirements where feasible.

5D. South Pasadena limited SB 9 so that all units can be a maximum size of 850 st ft. That guarantees a single family home is more likely to be built since they can build to 0.35 far. San Francisco did a feasibility study on SB 9 and determined that there was almost no sites in San Fran that a SB 9 project would be more feasible than a single family home, and that is without the 850 sq ft maximum SoPas does.

https://sfplanning.org/sites/default/files/documents/citywide/SB9_Summary_FinancialFeasibilityAnalysis.pdf

- **How addressed:** Program 3.m requires the City to develop guideless for SB 9 units by December 2022. There are no SB 9 units being counted towards meeting the City's RHNA.

6A. I think the numbers "consolidation on sites 10, 15, 19, 21 and 25" on the HCD letter is wrong. There is no site 25.

- **How addressed:** That is correct.

6B. Sites 10, 20, and 23 have the same owner. Sites 13 and 14 do not have the same owner. Site 14 the city met with an affordable housing developer and instead of developing decided to extend the lease of the playhouse located on the site.

- **How addressed:** In March 2022, the City Council modified its lease with the South Pasadena Theatre Workshop so that it would be a month to month lease to allow for the future development of the City-owned Site 14 without the constraint of a long-term lease.

7A. Paul told the city in May that the power lines are not a feasible site for anything. The Public works yard (site 9) should be removed from a list of viable sites. South Pasadena also counted the power lines sites for 15 moderate income sites on Table VI-44, line 6. This should also be removed.

- **How addressed:** Site 9 is owned by the City and the unit assumptions were updated to address HCD comments.

7B. See comments 1A and 1B above. There has been no new roads built in the Los Altos (SouthWest SoPas) since 1965 and the only lots that have been developed since that time had access to a road. All sites without road access, the planned pocket park, the guys backyard tennis court, the snake trail, and sites that don't exist should be removed.

Every site on page one of this spreadsheet:

https://docs.google.com/spreadsheets/d/1CZFzZM41DcAmVWgOUaFgaAU77Lrww9cSRwQ7GVJfWg/edit?usp=sharing

- **How addressed**: These sites inventory has been updated to reflect realistic capacity.

8A. They should only be allowed to claim the average ADU building permits for the last 36 months of whenever they get an approved housing Element. Other cities such as Los Angeles show there is a bump for two years due to pent up demand but then there is a drop in applications over time.

- **How addressed:** ADU assumptions have been updated to address HCD comments in Table VI-46.

8B. SoPas does not address the fact it is one of the richest cities in the Los Angeles II category of the scag survey and that it is unlikely that any ADU will be affordable to a low income family or individual unless it is given to family. Also they do not factor in that about half of all ADU applications will not be used for new housing but is instead an expansion of the current living space.

- **How addressed**: ADU affordability analysis has been updated on Page 231 with additional survey of ADU costs.

9A. They should never be allowed to have an "eight year objective" because that means it will never happen.

- **How addressed**: Thank you for your comment.

0A. Program 3.a is just a program that says sometime in the future they will study what kind of zoning is required to allow the density claims made in the Housing Element to be feasible. That kind of information should be done in the Housing Element itself.

- **How addressed**: Program 3.a requires the City to rezone to meet the City's RHNA requirement.

10B. The city forced 815 Mission to do a feasibility study for its density bonus. This feasibility study showed that the only way a 10% VLI housing project is feasible is if 57 feet is allowed, significant FAR increase, and almost every single open space and other requirement was waived. I would imagine a 10% VLI and 10% LI would require a much higher height and FAR limits than South Pasadenas base zoning has. You can find the feasibility study on page 104 and the concessions granted on page 120.

https://www.southpasadenaca.gov/home/showpublisheddocument/29308/637855358954070000

- **How addressed**: The City has included Program 3.n – Zoning Changes, the City will review and revise development standards or updates to processes and procedures to address constraints identified in this Housing Element and facilitate increased densities in the updated General Plan and the Downtown Specific Plan (DTSP) currently undergoing public review prior to adoption hearings. In addition, comparable Zoning Code revisions outside of the DTSP area will implement this program. The types of standards and processes that will need revising include height limits, open space standards, parking requirements including variances and findings for design review.

11B. No mention of the Pre-Application or the times to get through Building. Mission Bell started the permitting process in August 2017. It received planning commission approval in Feb 2020. It still does not have building permits, almost 5 years since the first contact with the South Pasadena planning department.

https://southpasadenan.com/mission-bell-project-approved-planning-commission-tweaks-conditionsauthorizes-venture/

- **How addressed:** The City is unaware of delays in this project attributable to the City, its staff, or its codified processes. The Mission Bell project has been moving through B&S, with many rounds of corrections to the developer-provided plans needed to get the plans to comply with building code. There is also delay related to their electrical connection (Edison), again as a result of developer design issues regarding compliance with state codes rather than the City code or staff related issues.

  Published comments from various news sources often do not have the full picture of what has transpired. The ability to address that record here is appreciated.

12A. I told the city as they were implementing the IHO that it was the highest in the state. I have repeated this statement about 15 times over the past year so the city cannot claim they did not know it. I provided them with examples of every local city IHO. I did math problems showing how it was non-viable.

They did a recent economic study this April that I sent in a different e-mail that showed that the IHO raised the prices by 11%. They implemented it with the purpose of shutting down development, as demonstrated by trying to backdate it illegally to apply to 815 Fremont. I sent in a report to HCD and Melinda Coy told South Pasadena this was illegal under SB 330 and they eliminated the backdating.

- **How addressed**: "Program 2.m – Update Inclusionary Housing Regulations.

Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

- 10 unit threshold
- In-lieu fees and cost of a comparable unit
- How the inclusionary regulations relate to state Density Bonus law"

12B. The economic report that they are doing is to show how feasible a density bonus project would be.

They are not examining if the IHO is feasible under the base zoning standards. On page 121 of the recent agenda packet the South Pasadena states "Building on the pro forma analysis completed in Task 2 and the understanding that the IHO will automatically trigger the State Density Bonus"

https://www.southpasadenaca.gov/home/showpublisheddocument/29512/637879719642900000

Automatically trigger the state density bonus means that South Pasadena knows it makes any project under the base zoning infeasible. They also applied it to buildings under 10 units which are much more likely to be infeasible with the added costs.

Since it was enacted in April of 2021, there has been only one project submitted. That was site 11 where the developer purchased the site not knowing the IHO was going to be implemented. And if the 19 Moderate and 89 above moderate numbers are true, it means South Pasadena is not applying the IHO to this project.

We are one year into the cycle and South Pasadena has intentionally killed all housing projects with this IHO.

Because of this South Pasadena should have to provide excess zoning and programs to catch up from them shutting down all projects.

- **How addressed**: The City will update the Inclusionary Housing Ordinance as described in Program 2.m above.

12C. There were contacts with developers when the IHO was being implemented. You will find comments from the developers of sites 8 and 3 on page 29 and 41, respectively, on the agenda packet when South Pasadena was considering the ordinance. You will see them stating that their projects are no longer viable. Victor Tang even did the feasibility analysis and showed that the IHO would cost the developer $933,000. For site 3 there has not been any contact with Victor Tang according to my PRA requests since this letter.

https://www.southpasadenaca.gov/home/showpublisheddocument?id=25699

- **How addressed:** The City held a forum with local developers on August 15, 2022 to discuss development constraints, including the City's Inclusionary Housing Ordinance. In attendance were numerous developers that have a history of working in South Pasadena or who are currently processing projects in the city, including Victor Tang. The Inclusionary Housing

Ordinance was not identified by the developers in attendance as a general constraint, but was identified as a constraint for projects less than five units.

Program 2.m, Update Inclusionary Housing Regulations requires that the City revise its Inclusionary Housing Ordinance to ensure that it is not a constraint for future development.

13B. See Comment 11B. There has not been a single recent project that has received building permits. Ask the city for the dates between planning commission approval and building permits for Mission Bell, the Senior center on Fremont, and Seven Patios. All of these projects have taken over 2 years to get building permits and as of recently none of them have building permits per year.

- **How addressed:** See above response.

18A. What the city describes as "Public outreach" is a combination of trying to talk to people who could give them more cover to claim that non-viable sites are actually viable. There were no meetings from November 17th until after this draft of the housing element was submitted. There was no effort to reach any residents, let alone renters or low income residents.

- **How addressed:** The commentor's position and opinion is noted. There is a record of the outreach efforts that were made over the past two years. As noted in Appendix B, prior to the release of the previous public review draft of the Housing Element, the City held public workshops on:
  - May 30, 2020;
  - June 2, 2020;
  - September 23, 2020; and
  - October 21, 2021.

  In addition, the City held the public hearings on:
  - July 21, 2020 at Planning Commission;
  - August 5, 2020 at City Council;
  - August 11, 2020 at Planning Commission;
  - September 8, 2020 at Planning Commission;
  - December 15, 2020 at Planning Commission;
  - January 26, 2021 at Planning Commission;
  - May 25, 2021 at Planning Commission;
  - October 12, 2021 at Planning Commission;
  - November 9, 2021 at Planning Commission; and
  - November 17, 2021 at City Council.

  During this time period, the City was operating under and emergency declaration due to the COVID-19 pandemic, which prevented most of the meetings from being held in person and required them to occur online.

19A. Appendix B explains why the city doesn't think the comments are valid or applicable. It does not integrate any of the comments into the Housing Element.

- **How addressed:** Appendix B has been updated to include public comments received on the draft Housing Element and responses to comments in the draft Housing Element.

Matthew Gelfand (July 5, 2022)

Dear Mr. McDougall:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. Our organization is monitoring local compliance with Housing Element law. We are writing to comment on the revised draft Housing Element submitted to HCD by the City of South Pasadena on May 11, 2022, as modified by the City's June 29, 2022 responses to HCD's anticipated comments.

At the outset, we note that other commenters have extensively detailed the inadequacies in the City's sites inventory, both in the context of the City's first draft housing element and the revised draft that HCD is reviewing now. Our comments are intended to highlight some of the most egregious problems with the inventory. We encourage you to review the comments made by others, including the extensive documentation provided on Twitter by Josh Albrektson. [https://twitter.com/JalbyMD/status/1538985994602459136?cxt=HHwWgMClqfbmydsqAAAA]

We also note that although the City provided some information about planned changes to its housing element in its June 29, 2022 responses to HCD's anticipated comments, the City did not provide specific information about which sites it intended to remove from its sites inventory.

Our comments here are based on the limited information provided by the City.

Non-Vacant Sites

The sites inventory in the City's draft Housing Element does not meet the requirements in Government Code Section 65583.2(g). The inventory does not adequately account for the impediment created by the existing uses on the listed nonvacant sites, including the possibility that a site will be maintained in its current use rather than redeveloped during the planning period.

What's more, the City's draft housing element appears to rely on nonvacant sites to satisfy over 50% of the City's lower income RHNA. But the inventory does not identify evidence that the existing uses on each of these sites will be discontinued during the planning period. For example:

 HCD's prior letter pointed to three specific examples of sites with existing uses to be further evaluated or removed. For two of the sites (the Pavilions site and YMCA site), the revised draft Housing Element adds only vague statements about owner interest and does not adequately address the impediment of existing use. No additional information is provided for the other singled-out site (the Vons site), which is purportedly able to accommodate the largest number of units of any site with 157 lower-income and 263 total units. The City should be required to remove these sites from its inventory.

 More generally, the inventory lists three of the five area grocery stores. Each existing grocery store is a vital existing use that is exceedingly unlikely to be discontinued within the planning period. But it is even more unlikely that more than one of these stores will be closed, as the remaining stores will be forced to shoulder the burden of additional demand once one store closes. Although in one case the City is treating the store's parking lot as the area for development, the parcel includes the store itself and state law requires the City to show that the existing use (the store) will be discontinued in order to avoid the presumption that it will impede development; this makes good sense, as there is no way to

develop on the parking lot parcel without discontinuing use of the store for at least several years in the absence of parking. The City should be permitted to list no more than one existing major grocery store on its inventory.

 The inventory includes a number of other sites containing existing uses for which the City acknowledges there is no evidence of developer or owner interest in redevelopment, and the City should be required to remove all of these sites from the inventory:

- **How addressed**: Vons and Ralph's grocery stores were removed from the inventory. Pavillions remains on the inventory and only the parking lot is being included in the inventory and any future development would include ground floor parking and residential above.

APN 5318-015-017 (900 Fair Oaks Ave.), purportedly able to accommodate 18 lower-income and 29 total units: This parking lot is leased to the Rite-Aid corporation through December 2035.2 [https://www.loopnet.com/Listing/900-Fair-Oaks-Ave-South-Pasadena-CA/14380777/] The draft Housing Element states that there is no interest from developers or the property owner. The fact that the property is not subject to a covenant with the adjoining property does not help the fact that it is encumbered by a lease until 2035 and cannot be developed within the planning period. The housing element notes that the site has been listed for sale, but conspicuously fails to reveal that it was listed as a parking lot to be used for income property through 2035, not as a development property.

- **How addressed:** The Rite Aid site was removed from the inventory.

APN 5311-012-019 (301 Monterey Rd.), purportedly able to accommodate 19 lower-income and 31 total units: Commercial building with an existing use as a liquor store. The draft Housing Element states that there is no interest from developers or the property owner.

- **How addressed**: Owner is interested in the development of high-density residential housing and has submitted an application for a total of 8 market-rate units on the three parcels. The sites inventory has been updated to reflect this information.

APNs 5318-004-012, 5318-004-019, and 5318-004-023 (716 Fair Oaks Ave.), purportedly able to accommodate 17 lower-income and 29 total units: Commercial property with an existing use as a relatively new McDonald's restaurant. The draft housing element states that there is no interest from developers or the property owner.

- **How addressed**: This site was removed from the inventory.

APN 5311-004-010 (143-161 Pasadena Ave.), purportedly able to accommodate 50 lower-income and 83 total units: Commercial property with new tenants. Although the draft housing element suggests prior interest in development, it indicates that the current status (presumably since the new tenants) is unknown.

- **How addressed**: The City made contact with the property owner and they support rezoning for future multi-family development.

Undevelopable Vacant Sites

The sites inventory lists as sites for housing a large number of vacant parcels on mountainous terrain, not served by paved roads and with no access to utilities. Most of these sites have zero likelihood of

being developed and they are either publicly owned with no plans for sale or privately owned and considered undevelopable by the owners. In some cases, themaps included with the City's housing element include references to roads that do not actually exist, such as "Harriman Avenue." "Harriman Avenue," as depicted in housing element (left) and the entrance to "Harriman Avenue" from the ground (right). In addition to having little or no likelihood of development, the City has not met the requirements of Government Code Section 65583.2(b)(5)(B) for these parcels.

Because these parcels are generally not served by a paved road, they should be addressed by requiring the City to remove all vacant parcels not served by an existing paved public roadway.

- **How addressed**: Sites previously listed on Harriman Ave have been removed from the inventory.

Density Assumptions

The highest-density project identified in the City's table of representative projects is a 50 unit/acre project that used 98% of the available FAR. Nevertheless, the City has used for some parcels an unrealistic assumption of 70 units/acre—a density that stands no chance of being achieved due to the City's voter-mandated 45-foot height limit and its restrictive development standards for FAR, setbacks, open space, parking, etc.

To justify this assumption, the City has cited two projects from other cities with very different development standards. The first project, in Hercules, is above the South Pasadena's height limit, so South Pasadena appears to have taken the absurd approach of simply omitting the unit count for the project's top floor in calculating the project's density without accounting for the feasibility and economies-of-scale differences between developing a four- versus three-story project. The second project is a smaller project in the City of Santa Monica. Both projects appear to be built up to the property line (indeed, the Hercules project appears to extend over the sidewalk) and have no visible parking. Nothing resembling these projects could be built in the City of South Pasadena.

The City should not be permitted to use a density assumption above 50 units/acre for any site on its inventory. In the alternative, the City could commit (in its rezoning program) to abandon its height limit or its FAR, setback, open space, and parking requirements on the 70-unit/acre parcels.

Thank you for considering these comments as you review the City's draft housing element.

Sincerely,

Matthew Gelfand

- **How addressed**: The City has included Program 2.n Citywide Height Limit Ballot Imitative to facilitate destines above 50 dwelling units/acre on sites in the Housing Element.

Ross Silverman (July 18, 2022)

To all involved;

I believe it is imperative that the upzoning include all CG, M, and even R zones adjacent to commercial corridors in South Pasadena.

Thank you

Ross Silverman
1008 Mound Ave.
South Pasadena, CA 91030

How addressed: The analysis done as part of the housing element update process indicates that upzoning all CG, M and R zones adjacent to commercial corridors in South Pasadena is not necessary to meeting the City's RHNA. However, upzoning is necessary in certain areas of the city, as shown in Program 3.a - Rezone and Redesignate Sites to Meet RHNA, The City will redesignating and rezoning the parcels listed in Table VI-50 and in the sites exhibits in Appendix A to address the shortfall of suitably-zoned sites to address the lower-income Regional Housing Needs Allocation (RHNA) once their General Plan land use and zoning is amended.

Josh Albrektson (Jul 18, 2022)

17 months ago South Pasadena enacted the highest IHO in the state. It was done to make sure that no housing could be built in South Pasadena and it succeeded. It killed every project except one. That is the schoolyard project where they purchased the land not knowing the IHO was about to be enacted.

In case the recent Housing Element letter wasn't clear, HCD actually wants housing to be built and doesn't care for bullshit fake "owner interest" and "Legal R1 lots" that housing will never get built. Here is one line:

"analysis on how given land use constraints such as height limits and the inclusionary zoning requirements may make development infeasible on sites"

After listening to the City Council meeting again I am certain that staff and Placeworks still don't know what the Housing Element law is in relation to the IHO. Amy Senheimer quoted the wrong law in the meeting and staff kept claiming this study proved the IHO to be feasible.

As I have said many times in public comment, you cannot use a density bonus to make anything possible for the Housing Element. It is at the bottom of page 14 of the June 10th 2020 HCD memo on Housing Elements.

" The analysis of "appropriate zoning" should not include residential buildout projections resulting from the implementation of a jurisdiction's inclusionary program or potential increase in density due to a density bonus, because these tools are not a substitute for addressing whether the underlining (base) zoning densities are appropriate to accommodate the RHNA for lower income households. Additionally, inclusionary housing ordinances applied to rental housing must include options for the developer to meet the inclusionary requirements other than exclusively requiring building affordable units on site. While an inclusionary requirement may be a development criterion, it is not a substitute for zoning. The availability of density bonuses is also not a substitute for an analysis, since they are not a development requirement, but are development options over the existing density, and generally require waivers or concessions in development standards to achieve densities and financial feasibility."

Not only that, the city has to show that the IHO is not only barely feasible, but you have to show that it is LIKELY that the buildings will still happen with the IHO AT THE BASE DENSITY.

As I am writing this on Thursday I believe that SoPas will propose a 15% Low Income IHO. A 15% Low income IHO was not analyzed by EPS, but EPS did produce some great data that can be used to analyze IHOs in South Pasadena.

And this data shows that a 15% low income IHO is not feasible in South Pasadena with the current conditions at the base density (or even with significant upzoning). This would be very easy for me to prove to HCD using the data provided. It would also be obvious to anybody who has experience developing buildings or providing loans for buildings. It takes about $5 per sq ft rent to be feasible.

I want an IHO that actually means the buildings actually get built. For 17 months you had one that made sure that no buildings could get built despite my objections and proof it was the highest IHO in the state.

So if you want my support on this IHO this is what I propose:

1. 5% Very Low OR 10% Low OR 25% Moderate IHO

2. Buildings under 10 units fully exempted

3. In Lieu fee for fractions as described in the April Report. Builders can fully pay the In Lieu fee to opt out. (This is required by law)

4. If South Pasadena produces less than 200 units a year starting with the 2024 APR, then the IHO is eliminated.

Or you can enact a 15% Low Income IHO and wait for it to be rejected when I show HCD that it is not feasible using the data in today's report.

There is no developer or bank that would consider a 15% IHO feasible based on the data provided. I will also point out HCD told the City to reach out to developers in part so that the developers would tell them that the 15% is non-viable.

"Other Local Ordinances: While the element now describes the inclusionary housing requirement and local height initiative, it generally does not analyze the impacts on housing cost, supply and ability to achieve maximum densities, including densities proposed as part of this housing element. For example, the analysis of the inclusionary requirement should, among other items, address the 20 percent requirement and cost impacts, 10 unit threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law. The City should engage the development community as part of this analysis. Please see HCD's prior review for additional information."

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed**: "The City has included Program 2.m – Update Inclusionary Housing Regulations.

  Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

  - 10 unit threshold

- In-lieu fees and cost of a comparable unit
- How the inclusionary regulations relate to state Density Bonus law"

Josh Albrektson (July 22, 2022)

The agenda packet has been published and I have read through it. Your staff still doesn't know the law/requirements of an inclusionary housing ordinance as it relates to the Housing Element, no matter how many times I have posted the paragraph at the bottom of page 14 of the June 10th, 2020 HCD memo.

All proposals guarantees a rejection of the Housing Element, so this entire meeting will be a waste of time.

- **How addressed**: "The City has included Program 2.m – Update Inclusionary Housing Regulations.

  Following results of the financial feasibility analysis of the existing Inclusionary Regulations, the City will update the Inclusionary Housing Ordinance to reduce the required percentage of inclusionary units from 20 to 15 percent. The City will also analyze the following parts of the regulations and will update them as needed to address constraints:

  - 10 unit threshold
  - In-lieu fees and cost of a comparable unit
  - How the inclusionary regulations relate to state Density Bonus law"

Alan Ehrlich (August 11, 2022)

Hi Angelica,

A "draft' ordinance originating from CHC was brought to my attention yesterday but I haven't been able to determine if it was in fact enacted. While the draft does not appear to outright ban demolition of older buildings, if it does exist, it might be seen as a constraint on developement.

To the extent Josh A (or HCD) has not mentioned anything about this, either he (they) is (are) not aware of it or, as it appears, is a lesser issue of concern. Could you please confirm is this draft, or something similar, was actually adopted and on the city's books.

thank you,

Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

-"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

See #3 on Page 20. This is from 2017.

ORDINANCE NO (southpasadenaca.gov)

If this process is removed to allow for the development of affordable multi unit housing we could get more sites. There is nothing culturally or historically significant about most the buildings on Huntington or even those fourplexes on Brent and Park.

- **How addressed**: Thank you for your comment, the City will continue to explore all options to provide more housing in the City of South Pasadena.

Josh Albrektson (September 1, 2022)

These are the programs I would like to see South Pasadena adopt.

In the June 29th letter to HCD the City made a commitment to increase the transportation options to lower income residents without cars (Page 10). I know this was probably a bullshit throwaway line so that you could pretend to be doing something without actually planning to do anything. Here are the bike programs that need to be firm commitments with deadlines and not just some bullshit "We will look into it sometime in 7 years." Of note, just last month 3 people were killed by a car on Marengo St, something that possibly would have been prevented if these changes were implemented.

- **How addressed**: The Housing Element has been revised to include documentation of transportation network improvement, including Fremont/Huntington Mobility Active Transportation Project, North-South Corridor (Fair Oaks) Intelligent Transportation System Deployment, Rectangular Rapid Flashing Beacons at three locations in the City's lower-income residential area, and the Mission Street Slow Street Pilot Program. Additional transportation network updates will be addressed in the forthcoming revision to the City's General Plan and the Downtown Specific Plan.

1. The Mission Street Slow Street program is made permanent. (Bottom of page 9 of 6/29 letter). Bike lanes and no more than one lane of car traffic in each direction would be implemented and remain implemented. Right now there are bike lanes on Mission Street East of Fair Oaks and Bike lanes on Marengo. This would allow the entire eastern half of the city to have a safe route to bike to the train station. This should be done by the end of 2023.

- **How addressed**: The City's Slow Streets Program is intended to provide space for residents to safely walk and ride, and to support local businesses' use of outdoor space for dining or other purposes. The next step in this program is the installation of temporary program equipment purchased with grant funding for short-term installation, such as temporary striping, curb extensions using reflective delineators, and bicycle lanes using short-term paint/tape and signs. Other placemaking elements are also incorporated like furniture, plants, art pieces, and parklet structures outside of businesses, to create usable street space. The temporary installation is planned for Spring 2023 and is expected to be in place for 6-months, after which an assessment of the design's observable performance, and an evaluation of the community's experience, will be conducted – this should inform the future consideration of potential permanent changes to Mission Street.

2. The Bike lanes and one vehicle lane is extended west of the train station to Pasadena Street where there are bike lanes that extend to the Los Angeles border. This would allow the west part of the city to safely travel to the train station. This should be done by the end of 2023.

- **How addressed**: Bicycle lanes along Mission Street and Pasadena Avenue are included in the City's adopted Bicycle Master Plan. Temporary bicycle lanes are expected to be implemented along Mission Street in 2023 within the Slow Streets Program, and the incorporation of bicycle lanes at the intersection of Pasadena Avenue and Mission Street are being evaluated in the current street resurfacing project, which is in the mid-design phase.

3. Monterey Road in Los Angeles has bike lanes. These lanes end at the South Pasadena border. The bike lanes should be extended to the junction of Monterey Road and Pasadena Ave. This should be done by the end of 2024.

- **How addressed**: A Class 2 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

4. South Pasadena schools are known as one of the best schools and there is no safe route for kids to bike to the 2 elementary schools on flat land. As mentioned about just last month 3 people were killed on Marengo Street.

- **How addressed**: City Council has directed staff to focus the next round of Metro Measure M Multi-Year Sub-Regional Program funding requests on bicycle facilities and pedestrian crossing improvements. Staff plan to focus this funding request evaluation on neighborhoods containing schools.

4A. Class one Bike lanes should be done on Marengo Ave from Garfield Park to the City of Alhambra. These would be two way bike lanes on the east side of the street where Morango elementary school is. Going from west to east, it would be Parking south, Traffic lane South, Traffic lane north, Parking north, Bollards, Bike lane south, Bike lane North. This should be done by the end of 2024.

- **How addressed**: A Class 1 bicycle lane is not proposed to replace the existing Class 2 bicycle lane along Marengo Avenue in the City's adopted Bicycle Master Plan, however, a Class 1 bicycle path is proposed parallel and adjacent to Marengo along the Southern California Easement from Garfield Park to the City of Alhambra.

4B. Class one Bike lanes should be done on the South Side of El Centro extending from Orange Grove to Pasadena Ave where Arroyo Vista Elementary school is. Going from North to South it would be Bike lane going east, Bike lane going west, bollards, Parking going east, traffic going east, traffic going west, parking going west. This should be done by the end of 2024.

- **How addressed**: A Class 2 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

  4C. The El Centro bike lanes should be extended from Orange Grove east to the train station. The South Parking lanes would be removed. Of note EVERY home on the south side of El Centro in this stretch has a garage and driveways that could fit at least 4 cars. From south to north it would be Bike lane going east, Bike lane going west, bollards, traffic going east, traffic going west, parking going west. This should be done by the end of 2025. Timeline: For the

last 4 multifamily projects South Pasadena has not had a single project get building permits, even though the earliest project was initiated in 2018. Extensive changes need to be made in the manner that South Pasadena processes housing. These are just some of the changes that should be implemented.

- **How addressed**: A Class 3 bicycle lane is proposed for this location in the City's adopted Bicycle Master Plan.

5. A total of 5 planner equivalents are required to be employed at all times. This could be 4 full time employees with 2 part time. This should be implemented immediately.

- **How addressed**: The City currently has 1 planning manager, 3 associate planners, 1 assistant planner and 1 planning counter technician FTE positions funded this fiscal year. The assistant planner began employment on Sept. 6 and the city is currently recruiting for the Planning Counter Technician position. In the meantime, a part-time planning management intern assisting until the Counter Technician position is filled.

6. The pay for entry level planners, both currently hired and for all job postings, should be the average of Pasadena and Los Angeles plus 2% and benefits. This should occur immediately. For the last 7 years there has been EXTENSIVE turnover with the average person lasting 1 year in South Pasadena. There is currently only 1 part time planner who was employed by South Pasadena who was present a year ago.

- **How addressed**: The city recently completed a compensation study and in the coming months will begin a classification study. The compensation study used comparable cities to South Pasadena in terms of overall organizational structure, size, and budget.

7. The Community Development Director has her Salary immediately changed to the Average salary of the directors of the Pasadena, San Marino, Alhambra, and San Gabriel.

- **How addressed**: The city recently completed a compensation study and in the coming months will begin a classification study. The compensation study used comparable cities to South Pasadena in terms of overall organizational structure, size, and budget.

8. The pre-application is eliminated, effective immediately.

- **How addressed**: The pre-application is intended to be a tool for developers and it is optional. The Pre-Application process helps streamline the overall entitlement process by helping the applicant and staff identify and resolve critical issues very early in the process.

9. The program where a project has to pay for a planner that does the work of the city is immediately ended. South Pasadena can pay for this consultant if it chooses to.

- **How addressed**: The City remains committed to allowing project planners to be hired by applicants willing to expedite their projects. Such process does not affect the remining projects in the queue as no staff members are used to review such projects to the detriment of non-expedited projects.

To ensure that no delay occurs due to this project opportunity, the City will facilitate special meetings of the planning commission and city council (as applicable) to ensure sufficient time for projects to be considered without delay.

10. All multifamily housing projects 10 units or greater are automatically moved to the front of the line and heard immediately.

- **How addressed**: City is unaware of the ability and feasibility to create such automatic advancement of projects through the planning process. City will adopt a process of placing such housing projects at the beginning of each meeting on which such item is considered to ensure that the widest exposure to public comment is gathered and that the project is not unduly delayed.

11. All multifamily projects between 2 and 9 units are moved to the front of the line after 2 months.

- **How addressed**: City is unaware of the ability and feasibility to create such automatic advancement of projects through the planning process. City will adopt a process of placing such housing projects at the beginning of each meeting on which such item is considered to ensure that the widest exposure to public comment is gathered and that the project is not unduly delayed.

12. Removal of CUP for all projects under 50 units.

- **How addressed**: The requirement for a CUP has not been identified previously as a constraint on development and has not been included as one of the specific policies in the Housing Element. However, this comment will be considered when developing the Downtown Specific Plan's requirements for residential development.

13. All multifamily projects that are under 50 units and in the downtown specific plan, Ostrich Farm, or an identified Moderate or Low income site are not required to perform a Transportation study, Noise Analysis, or Climate Change and Energy analysis. These would be deemed acceptable and would automatically qualify for a class 32 exemption. If required, South Pasadena could perform a citywide analysis of Traffic, Noise, and Climate Change for all sites as described above at 30% over the claimed units in the Housing Element.

- **How addressed**: Developments in these areas of the city will need to comply with CEQA, including analysis for transportation, noise, climate, and utility impacts. Developments will be considered for categorical exemptions if they are eligible.

14. All housing applications are posted online once a week and updated when their status weekly so that it could be determined when the application was deemed complete, when the CEQA analysis was done, and that every part of the Permit Streamlining, SB 330, and AB 2234 act are being followed.

- **How addressed**: Such requirement is a undue burden on the City and staff, and would cause delays in other aspects of duties by the planning division, while providing only marginal benefit towards the production of additional housing opportunities. City will continue to monitor ways other agencies are updating such information and evaluate if new technologies can be employed to address this issue.

15. It is required that the first planning commission, Design Review, or Cultural Historical committee happen within 6 months of the application being deemed complete for all multfiamily housing projects.

- **How addressed**: The City is required to follow the requirements of the Permit Streamlining Act with respect to public hearing dates once a complete application has been filed.

16. All commission hearings are completed within 90 calendars of the first commission hearing for all multifamily housing projects. If not done within 90 days, the application is deemed complete. This includes all chair reviews.

There are extensive charges and requirements for all multifamily housing that make it infeasible. Of note, South Pasadena produced a feasibility study that showed that nothing is viable.

The following changes should be made immediately to make multifamily housing viable in South Pasadena.

- **How addressed**: The City is required to follow the requirements of the Permit Streamlining Act with respect to public hearing dates once a complete application has been filed.

17. The FAR requirements as stated in SB 478 are implemented immediately.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a.

18. Multiple Story exception of a 45 degree from the front to posterior is eliminated. (Page 114 of 2nd Housing Element)

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan. This will be considered as part of that amendment.

19. Private open space required for all projects changed to 75 sq ft per unit

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

20. Common Open Space required cut in half for all projects.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

21. Removal of all requirements for how the private open space is accessed from the apartment.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

22. Removal of all dimension requirements for the common open space.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

23. Elimination of all open space requirements of elevation

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

24. Removal of all uncovered area requirements

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

25. Open Space, either common or private, can be on the roof of the building.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

26. Removal of all parking requirements within half a mile of a transit stop for multifamily projects.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

27. Removal of all commercial parking requirements within the downtown specific zone.

- **How addressed**: New development standards will be included as part of the Downtown Specific Plan.

28. The city cannot require a development to provide public parking. (There are multiple previous housing projects where this was required and the parking lots are empty. The Mission Meridian parking garage across the street from the train station is at 41% capacity on a weekday and 18% on a weekend. It is the lowest % of any parking lot on the Metro Gold Line.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan.

29. Single family parking requirements lowered to one spot.

- **How addressed**: The City's zoning ordinance will be amended as part of Program 3.a. New development standards will be included as part of the Downtown Specific Plan. This will be considered as part of this amendment.

30. Signage made by the city for all public parking lots. This should be done by 2025.

- **How addressed**: This comment does not relate to the Housing Element. It will be addressed in other parts of the General Plan.

31. Immediate removal of the Inclusionary Housing Ordinance. The city knows the current IHO makes every project infeasible and both the planning commission and City Council directed the staff to change the IHO. The Staff decided to make it as a program for removal meaning that extensive time will pass with no housing being financially viable.

- **How addressed**: Changes to the Inclusionary Housing Ordinance will be made as part of Program 2.m.

32. The city is proposing that there be a ballot initiative in 2024 to remove some of the height limit. This is COMPLETELY unacceptable. The height limit was identified as a significant constraint in the 12/21/21 HCD letter and the staff chose to not do anything about it. This should be required to be done in March 2023 and the Housing Element should not be deemed compliant until the height limit is officially repealed.

- **How addressed**: The height limit will be considered consistent with the court order and Program 2.n.

33. Removal of the following fees for multifamily housing: Tentative Parcel Map, Tentative Tract Map, Lot line adjustment, CHC Appropriateness, Environmental impact report, Zoning text and map amendments, Specific plan application, Specific plan amendment, Development agreement review, Planned development, Technology Surcharge, General Maintenance fee.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate alternative funding sources for such project requirements for multifamily housing projects.

34. Removal of the Public Art Fee

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate for multifamily housing projects.

35. Water connection and Sewer connection should be at cost.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate for multifamily housing projects.

36. Removal of all fees for ADUs.

- **How addressed**: At this time the City is unable to commit to such project. The City will create a program to annually reevaluate.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Yvonne LaRose (September 9, 2022)

The Housing Element considerations that are to be finalized by September 15, have a number of issues that are of concern and need to be addressed. Affordability is one of those issues. Some of the very indirect impacts of that issue are addressed in some research I did in April of this year. The research was related to the bills signed by Gov. Newsom regarding restrictive covenants, to wit:

> Governor Newsom Signs Bill Requiring Redaction of Unlawful Restrictive Covenants - California Land Title Association

A quote from the below article subtly reminds one of South Pasadena's Sundown standards and how the residual effects of that era still exist in many tenuous ways and are accepted as the community standard.

> **"We need to provide wealth, building opportunities for those individuals and those families who were left out," Flores said. "We need to provide those wealth building opportunities in communities where the land has a higher value, not because it's fair, but because of laws in the past that made it so and continue to make it so."**

We are challenged with creating more housing for a projected drastic increase in population that does not parallel our neighboring cities of similar size and constituency. The issue of how to create that housing goal with a limited amount of space is definitely a challenge, yet using San Gabriel as an example, the challenge appears to be reachable. The next question is how the vision can be attained while also making inclusion and equity part of the actualization.

The conclusion of the article provides food for thought as we strive to create a strategic housing plan that makes our city legitimately and in reality one of inclusiveness.

> **Because whether people choose to remove racially restrictive covenants, like Beatty and Zak, or keep them as evidence, like Dew, the goal seems to be the same — to remember the past in order to build a more equitable future.**

Let us not use zoning laws to substitute for enactment of a thinly veiled practice of indirectly defaulting to what should be part of our dark history in the form of restrictive covenants couched under some new terminology.

Viva
Yvonne LaRose
Organization Development Consultant: Diversity/Title VII, Harassment, Ethics
Cell: 626-606-4677

- **How addressed:** The Housing Element has been updated to more fully address the City's history of using land use controls as a way to make South Pasadena an exclusive community. The goals and programs throughout the Housing Element are intended to open South Pasadena up and expand the housing opportunities throughout the City.

Victor Tang (September 10, 2022)

Hi,

This is Victor Tang, developer for site 3. We have already submitted plans to build 8 market rate units on three parcels. Per 6th Housing Elements, my site will be zoned Affordable Housing Overlay Zone. There is conflicting information regarding the rezoning date:

1. On page 14 under "Program 2.k", it says "Amend zoning to include overlay by Oct 15, 2024."

2. On page 17, under "Program 3.a", it says "The rezoning of the vacant parcels must be completed within one year of the beginning of the 6th Cycle Housing Element planning period, which is October 15, 2022. Sites that are planned to receive the Affordable Housing Overlays in the General Plan and Zoning Code are also addressed by this program."

If the rezoning date is Oct. 15, 2022, does it mean I can submit another plan with 50+ units right after Oct. 15, 2022? Do you have the zoning code and development standard of the Affordable Housing Overlay Zone for me to do a feasibility study? If it is the Oct 15, 2024 date, we have no interests in waiting.

- **How addressed:** These two dates are for different programs. Site 3 is not a vacant site, and is therefore addressed as part of Program 2.k. The Housing Element currently anticipates the construction of 8 above moderate income units on the site, which is consistent with the application the developer has submitted to the City for this site.

For Table VI-41 on page 144, Tree Removal Application is missing. If a lot for development has native trees, there will be a public hearing by Natural Resources and Environmental Commission. It uses subjective standard and will stall the development for several months. For my past projects, the planning commission asked my architect to redesign so that one oak tree could be preserved. We had to spend a few months to have an alternative design to prove to the planning commission that alternative design to preserve the tree was not feasible.

I hope city attorney can review the Permit Processing carefully from page 141 to page 144 to make sure that the city has satisfied the requirements of SB330 (Housing Crisis Act of 2019). Summary of SB330 can be found here:
https://www.smwlaw.com/2022/01/13/applying-sb-330-in-real-life/ Here are some keys points of interests:

1. Permit Streamlining Act provision requiring completeness determination within 30 days

2. Local agencies must notify an applicant of any inconsistencies with objective standards within 30 days of the full application being determined to be complete if the project has 150 or fewer units, or within 60 days, if the project has more than 150 units. The local agency must include all inconsistencies in this notification; any inconsistency that is not noted in a timely way cannot be used as the basis for denying a project.

3. A single residence can count as a "housing development project."

4. Only projects with two or more residences are "housing development projects" for purposes of Government Code section 65589.5, which prohibits cities and counties from denying or making infeasible "housing development projects" that comply with objective development standards, unless specific findings are made

Based on item 4 above, the city needs to stop using discretionary review on multifamily development immediately instead of waiting for "the updates to the General Plan and zoning are complete and the Downtown Specific Plan is adopted' (page 141). City can offer developers incentives to subject their projects to discretionary review voluntarily.

30-day deadline for item 1 and 30/60-day deadline for item 2 are critical. For example, a developer can submit a project with 60-ft height. If the city doesn't notify the developer that 60-ft is not allowed by the zoning code before the deadline, city can't deny the project height later.

I talked to other developers and architects. Many are frustrated with the long entitlement process time. I was told there were 60-80 projects in the pipeline and I am not sure how many are qualified "housing development project". As the planning department is short on staff and it may not be aware of the significance of the deadlines in item 1 and 2 above, deadline for notifications may have been missed for many projects. Therefore the city has very limited basis to deny these projects. The city needs to give these projects entitlement quickly to clear the backlog and avoid possible lawsuits.

As the planning department is short on staff, many developers are willing to pay external planners to expediate the review process.

- **How addressed:** Program 3.b requires that the City adopt objective development standards for mixed-use and adaptive re-use projects within 120 days of the adoption of the Housing Element. Additionally, Program 3.e requires that the City develop an electronic permitting system to help streamline the approval process and address many of the issues raised by this comment.

I have another project in Alto de Monterey Overlay District. The zoning code requests 15ft first floor setback and 35ft second floor setback. Even second floor ADU requests 35ft setback. I hope the city can update zoning code and ADU Ordinance in this district to make development feasible.

Best,
Victor Tang

- **How addressed:** Program 3.f requires that the City to review its ADU ordinance within six months of receipt of comments from HCD regarding the ordinance.

Josh Albrektson (September 10, 2022)

You guys performed a feasibility study that showed that all buildings are not feasible under your current IHO.

This feasibility study did not include carrying costs or the costs to tear down the structure that is on the property.

This feasibility study also used prototypes that are not allowed to be built in South Pasadena.

This feasibility study used a return on cost of 5% and without the carrying and demolition costs claimed that ther prototypes that cannot be legally built in South Pasadena are feasible at 5.2% Yield on cost.

West Hollywood uses a 12% yield on cost for viability. San Francisco says 15-24% is marginal and 25% is feasible.

Using your numbers, a fully market rate project with no inclusionary units would have a 6.8% Yield on cost, again using a prototype that cannot be built in South Pasadena and without carrying or demolition costs.

How exactly can you guys say any inclusionary housing ordinance doesn't affect feasibility when 100% market rate projects (Like Mission Bell) do not pencil out today?

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** Program 2.m requires that the City update its Inclusionary Housing Ordinance within six months of adoption of the Housing Element. Program 2.i requires that

the City monitor the effectiveness of the Inclusionary Housing Ordinance and to make changes by the end of 2023, then annually thereafter as revisions are needed.

John C. (September 11, 2022)

I believe we can raise height the limit in a way were more than 50 percent of the residents voters would have no problem with it. The way to do that is making a bipartisan deal with the residents of South Pasadena. I will use an example. Example, South Pasadena City height limit is 45 feet what if we say we raise the height limit by 5 feet. Will the residents of South Pasadena make a big deal out of this? In my opinion, no, I do not next South Pasadena resident would have issue. Also, if you put that on the ballot in election it would pass easily because the majority of residents thinking logically will not being making a big fuss over it. I know there will be the minority of the few resident will definitely make an issue out of raising the height limit by 5 feet, but remember not everyone is going to agree with this and also those resident are the minority. But, if you go the other way by saying you want to raise to 110 feet than the majority of residents will say no. I read in the 3rd housing element draft from a previous person comment that the height limit will have be raised by 12 feet. I believe most resident will have no problem with that or even if you ask to raise by 15 feet they still will have no problem. For this to happen the residents need to know how high the city need to raise the height limit and that question has not been answer.

From, John
Sent from Mail for Windows

- **How addressed:** Program 2.n and the court order require that the City place a measure on the ballot by December 31, 2024 to remove or amend the height limit to allow for the densities necessary to meet the City's RHNA requirements under this Housing Element. As part of this ballot measure, the City will work with developers and community members to determine an appropriate height limit and to build support for the ballot measure.

Elizabeth Anne Bagasao, South Pasadena Tenants Union (September 14, 2022)

To Whom It May Concern:

South Pasadena Tenants is attaching our comments on the Third Draft Housing Element that was released for public review on September 8, 2022. It is our understanding that the deadline for the city to submit the third draft to HCD is September 15 however after review of the draft we feel strongly comment is warranted.

We thank you for your consideration of our comments and would welcome any discussion of our response to the Third Draft Housing Element.

Best regards,

Anne Bagasao on behalf of SPTU

SPTU Third Draft Housing Element Comments:

In the July 8 HCD encouraged "the City to revise the element as described…, adopt, and submit to HCD to regain housing element compliance."

After comparison of the HCD letters from December 2021 and the most recent of July 2022, we are concerned that the City has not sufficiently responded to the HCD's comments enough to satisfy compliance.

The July 8, 2022, letter states the following:

> *Local Data and Knowledge: While the element now includes some discussion of historical development patterns and racial exclusion for significant portion of the 20th century, it should include additional discussion of land use practices including zoning, growth controls, height initiatives and any other practices that affect housing choices since the latter half of the 20th century. This information should complement the discussion of the socio-economic patterns within the City and the City relative to the region and based on a complete analysis, the element should formulate appropriate policies and programs to combat past patterns and impacts on inclusive communities.*

The third draft fails to demonstrate strategies to combat past patterns of impacts on inclusive communities.

We assert that building ordinances, based in preservationist practices, create exclusivity and deter inclusion of very low- and low-income individuals, the disabled, and people of color. As stated in Section 6.4.6 on page 101, South Pasadena admits to adopting zoning and housing policies as recently as the 1998 General Plan with intent of limiting inclusivity if not keeping people out. This attitude continues to influence building and zoning ordinances in South Pasadena. A sampling of statements that reflect these attitudes are found in the comments from the Second Draft Housing Element are found within the Third Draft Housing Element

South Pasadena Tenants Union believes that those commenters are in the loud minority and do not represent the many who aspire to achieve a racially, culturally and economically diverse South Pasadena.

During the WISPPA presentation on 9/12, comments like "protect our neighborhoods" and "we are afraid" were responded to by City staff, not with a can-do attitude of encouraging enthusiastic cooperation with the State but a mood that supported the culture of exclusivity indicative of NIMBY culture.

- **How addressed:** The draft housing element acknowledges past exclusionary practices and states commitment through policies to ensure that there are housing opportunities for all current and prospective residents, regardless of income. (pages 76-77).

A History of Exclusion

In Section 6.4.6, the Housing Element describes decades of planned exclusion. As per the text referencing the 1963 General Plan,

> "The first three objectives of the Land Use Plan were stated as:
>
> • *To protect the amenities of single family areas from encroachment of inharmonious uses, including higher density residential,* ***where stability and exclusiveness are desired"***

Three and a half decades later, South Pasadena doubles down on its protectionist land use policies. From The Vision Statement for the 1998 General Plan the influencers pull back the drapes of their goal of maintaining a community of historic exclusivity.

> *" In order to preserve our small-town feeling and to flourish in the 1990's and beyond, South Pasadena must be committed to the goals of revitalizing its commercial areas and preserving its single-family residential character… We are committed to maintaining a balance between our existing single and multi-family housing units which honors our traditional values and evolving cultural diversity. (emphasis added)*

We see phrases in the above passage, that we also hear today in public forum and on social media: "preserve our small-town feeling", "preserve its single-family residential character", "honors our traditional values". This rhetoric, which is elitist, remains the impetus for all things related to building, transit, and most recently wildlife in South Pasadena.

The problem with the fetishization of the past in the form of "cultural heritage preservation", is that it perpetuates systemic bias.

We refer the City to this excerpt from an article written by preservationists, Franklin Vagnone and Samantha Smith and posted a blog to Twisted Preservation, A Cultural Assets Consulting Group. If you can recognize how the existing building code, zoning laws and cultural heritage ordinance reflect the list below, then it is incumbent upon City to do more than what is stated in response to the HCD comment at the top of this discussion.

1. Preservation is essentially an elitist, class and racially divisive activity whose result is a form of economic bias and segregation.

2. History sites can perpetuate a divisive form of nostalgia that supports and validates racism and exclusion.

3. Preservation can limit inclusion and perpetuate racial & social bias by regulating cultural narratives to simple themes.

4. Historical regulations, district codes, and Preservation restrictions can be latently economically restrictive and culturally exclusionary, benefiting only those individuals who can afford the added costs, thus ensuring a form of aesthetically gated communities that reflect the dominant culture.

5. Historic districting and preservation code requirements can be a contemporary form of "redlining" which excludes a diverse economic group of people from land ownership.

6. Preservation is susceptible to the harshest form of capitalism in that only those historic sites that are targeted with money actually get preserved. Preservation choices are a matter of economics, not just history. The most revealing, unglamorous sites have rarely survived, nor have they been preserved.

7. As Preservation has become more professionalized and can require a four-year degree, college has become more expensive and thus constricts the possibility of a racially, culturally, and economically equitable pool of professional practitioners. As a result, professional practices are sometimes biased.

8. Preservationist, right now today, need to stop fetishizing the built environment and begin considering how preservation itself is part of the problem.

9. Look at the money in Preservation. A budget reflects our priorities. Money goes where it is told. There is nothing natural about the market economy or what gets preserved. **Wealth Preserves Wealth.**

10. Language as a tool of bias in Preservation with a weak notion of the appearance of diversity rather than full systemic representation. *

We will direct you to the City webpage for the Cultural Heritage Ordinance. This is the very first paragraph:

"South Pasadena prides itself on the quality and historic character of its neighborhoods and its small-town ambiance. Maintaining these qualities is considered key for retaining residents…"

The ordinance was re-established in 2017 and contains a section that reads:

"To stabilize and enhance neighborhoods and property values…"

It appears that this ordinance, in its entirety, consciously serves to maintain and increase the upper income level status quo. This ordinance, by its own admission, is counter to any inclusive housing growth in South Pasadena.

We ask that the City state within the Housing Element a commitment to analyze the Cultural Heritage Ordinance **for any and all language, policies and requirements that impede affordable housing development and promote exclusivity.** It is not enough to condemn past practices. You must correct them.

Many of these caveats in the Cultural Heritage Ordinance impede the development of new housing. Without amending the ordinance, the City will run into a plethora of issues when actually trying to achieve the goals set forth in the Housing Element.

Example: Ordinance #2315 effective August 18, 2017, 2.6.5 E.3 states that property owners wishing to demolish any property built "at least 45 years prior to application" will have to undergo an approval process by the Cultural Heritage Commission. The procedure requires the property owner to contract incur expense related to the following:

"The determination as to whether a property is a Cultural Resource shall require a deposit by the applicant to cover City costs associated with hiring a historic consultant and/or an Architectural Historian; and/or a deposit to cover the costs associated with the preparation of an Initial Study, Environmental Impact Report, Mitigated Negative Declaration or Negative Declaration."

The ordinance goes on to describe a multitude of hoops through which the for the property owner will need to jump. The Cultural Heritage Commission is a volunteer body that meets once a month. How long does the process to receive sign off form the CHC to demolish a building built in 1978 take? How much investment of time and money is that costing any properties owner who may want to develop more efficient housing on their property?

This one rule alone is a tremendous impediment to the very work you propose in the Housing Element. A "45 year" rolling benchmark would mean that the multiunit complex at 1700 and 1720 Mission Street would have to undergo CHC scrutiny for redevelopment. How does the City justify 1978 construction requiring historical review?

- **How addressed:** The recent reorganization of the Community Development Department includes creation of a housing division and additional Planning staff (Programs 2.b, 3.l), with a senior analyst to focus on housing program implementation. City staff will work with the SPTU to review the CHO to address any barriers to affordable housing that could be removed through updates to the CHO.

SB 381

We encourage the City to follow the guidelines of SB 381. Opponents of SB381 argue that the conversion of the CalTrans houses to private ownership would create affordable home ownership. However, the investment that will be needed to rehabilitate the homes to the standards required by preservation guidelines (there is that word again) would not qualify these homes as "affordable".

We ask that the City act on SB381 , and that any surplus houses be converted to affordable rentals. Those structures deemed to be beyond repair should be demolished and the land utilized by the City in partnership with affordable housing developers to build 100% affordable housing as per Program 2.1.

Further regarding the CalTrans properties, we request that the City cease its efforts in blocking the transfer of 626 Prospect to Friendship Pasadena Baptist Church. Not only is that property not ours to control, this legal wrangling looks like a taxpayer funded effort to keep certain people out of our city. Friendship Pasadena Baptist Church is the oldest African American congregation in the area, established in 1893. One would say "an historic black church". The city, bending to the will of a small group of residents, has resulted in two legal attempts to block the transfer to Friendship Baptist Church that would provide housing to low-income families. The bad optics of this story should be of more concern to the City of South Pasadena then it currently is.

- **How addressed:** As detailed in Program 1.b, existing state law (SB 381) requires that the California Department of Transportation (Caltrans) sell the surplus residential property it owns in South Pasadena for use as affordable housing. The law requires that Caltrans offer the unoccupied surplus residential properties to the City of South Pasadena first, and then to the Los Angeles County Development Authority (LACDA) and then to housing related entities. The City of South Pasadena has expressed interest to Caltrans to purchase all of the unoccupied surplus properties in the city, and is currently analyzing the feasibility of purchasing the properties for use as affordable housing. Whether the City or another entity purchases the surplus properties, any entity purchasing the properties will be required to maintain them as deed restricted affordable properties.

Tenant Protections, Homeless Prevention and Preserving Existing Affordable Housing

The Housing Element Third Draft in its effort to demonstrate an understanding of how best to obtain certification has included a couple of programs that, while seeming practical, are incomplete. There is not one mention in the Housing Element regarding programs meant to protect existing very low, low income and moderate income South Pasadena tenants from displacement.

We reference Program 1.c and Program 3.c.

Program 1.c would trigger substantial renovation evictions of which we currently have one ordinance on the books that minimally protects tenants from renovictions. Without protections in place that would allow tenants to be able to stay in the units during construction or to return to units after construction is complete, at the same rate of rent they had been paying when enforcement was issued, the City puts

tenants at displacement risk. Renters are the root of our community and to relocate them outside of South Pasadena, where their children go to school, where they may work, congregate, worship and obtain community services such as recreational classes or senior meals, is 100% irresponsible. They are not the peacocks.

We propose that the City adopt an ordinance that would require landlords to accommodate their tenants during required updates and repairs either by allowing them to remain in the units or paying their rent to live in a comparable or market rate unit still within South Pasadena. Once the property is up to code, the tenant would be able to move back in at the same rate of rent they were paying. The same ordinance should include language to protect tenants from actions by landlords that would trigger evictions or prevent the landlords from concocting ways of getting more money out of tenants such as imposing amenity fees.

SPTU is seeing incidents of landlords now tacking on "amenity fees". While rent can only be increased by 8% under AB1482, landlords are now charging arbitrary fees that are to cover "amenities" such as use of the laundry facilities, landscaping, etc. These fees are uncontrolled so not considered part of the rent, much like the resort fees at hotels. One tenant reports that her rent was increased this year by 8% and her amenity fee was increased by 100% put her monthly payment to the landlord well over the allowable amount under AB1482.

Program 3.c similarly displaces tenants without the benefit of local protections. Again, keeping existing tenants housed in South Pasadena should be our goal not relocating them to other communities. Additionally, any properties that the City might expedite for demolition, that are currently occupied, are most likely affordable. Therefore, in pursuit of acquiring 10 new units of affordable housing we could potentially be losing 20 and in the process displacing the very South Pasadenans who need them most.

We request that South Pasadena include in its Housing Element proactive and concrete actions to adopt tenant protections that would ensure that tenants displaced as a result of Program 3.c are given the best fighting chance of remaining in South Pasadena. This would include, but not be limited to, a local ordinance for relocation fees required for any no cause evictions. We refer the City to that of the City of Pasadena and Los Angeles as models for such an ordinance. As a reminder the City now defers to AB 1482 which requires that landlords only provide one month's rent as moveout fee to tenants who are evicted without cause. That is not helpful in the very least. It's actually insulting.

- **How addressed:** South Pasadena implements State law regarding tenant protections. Program 1.c states the intent "to reduce displacement risk of tenants living in currently substandard housing." When implementing a proactive program based on the survey conducted (Table VI-26), those units that have substantial violations or are dilapidated will be prioritized. It should be noted that these units are all single-family properties, and do not include multi-unit rental properties. The protection of any tenants will be included as part of this program. Program 3.c confirms replacement of lower-income housing units when new construction is proposed, in addition to the creation of new affordable housing units through the inclusionary housing program.

<u>Maintaining Affordable Housing Inventory</u>

Program 3.f-3.k regarding ADUs, it's our understanding that the ordinance was revised to be in compliance with state law to increase the availability of long term housing, some of which could be affordable rentals.

In the aforementioned program sections, we don't see much about enforcement particularly of the use of ADU's as short-term rentals. It is common knowledge that the housing crisis in Southern California can be partially a result of the proliferation of commercially managed full time AirBnb properties. As far back as 2015, the community of Venice lost upwards of 10,000 units of affordable housing to Airbnb operators.

Without a local short term rental ordinance there is no way to monitor the use of all these new ADU's or to prevent them from being utilize as money makers for already high-income households as opposed to housing for family members or as affordable rentals. We therefore request that the Housing Element include a short-term rental ordinance.

- **How addressed:** SPMC Section 36.350.200.K (ADUs) currently prohibits renting out ADUs for a period of less than 30 days. The City has the option to require a deed restriction to enforce this regulation.

Homelessness

Program 2.f shows no change to what South Pasadena is currently offering as homeless services under the County Measure H funding. We expected that an increase in services would be more responsive to the HCD comments especially since South Pasadena lost its only direct homeless service provider earlier this year. Shower of Hope, which was formerly serving unhoused individuals with mobile shower facilities in District 3 at Holy Family Church was also a site where homeless case managers from Union Station could regularly locate and identify individuals in need of services. Currently, South Pasadena offers no city funded services other than outreach and resource distribution to the homeless community.

- **How addressed:** The most updated data that the City has in regard to unhoused people is discussed in the Housing Needs section (page 56). However, after publication of this draft of the Housing Element for public review, the County of Los Angeles published the 2022 Point in Time count numbers, which showed that South Pasadena's homeless population increased from 15 in 2020 to 50 in 2022. The City's response system, detailed in Program 2.f responds to the data from recent County homeless counts and reflects the City's partnerships to address the issues regionally.

Lastly, we see that the City references expanding the contract with Housing Resource Center for provision of services to tenants and those seeking information and assistance with housing programs, outreach and education. Since HRC has had the contract with South Pasadena, (2016) we have yet to see outcomes of said contract.

HRC proposed that their programs services would achieve the following:

> *"…will improve and expand affordable housing options, improve services to the homeless or specials groups, and increase access to resources for low to moderate -income residents in a variety of ways"*

As two volunteer organizations, SPTU and CareFirst who work closely with tenants in crisis and the homeless population of South Pasadena, are not aware of any indication that HRC successfully achieved this goal. For example in 2020, HRC poorly advised tenants who had received no cause evictions during the LA County Eviction Moratorium telling them that their evictions were legal. This caused at least one family to self-evict from an affordable unit. HRC only responded when contacted by then Councilmember Rick Schneider. It was with the assistance of Code Enforcement and the City Attorney

that SPTU was able to prevent the renovictions from going forward and stop the evictions. This action led to the Renoviction ordinance that was adopted later that year.

Additionally, the contract states that HRC will provide educational workshops within the City of South Pasadena. To our knowledge, there has not been such a workshop since 2020.

Because the outcomes of the 2016 cannot be quantified, we recommend that the City release an RFP for the future provision of those services mentioned in the Housing Element that refer to HRC as the provider. It's been six years and it's time for a review and refresh.

- **How addressed:** The new Housing Division will be reviewing the contract with HRC, which is pending renewal, and will confer with the SPTU to ensure that the revised contract, as well as its oversight, improves service to the public and meets the needs of tenants.

Citywide Height Limit Ballot Measure Repeal

We request that a repeal is citywide and not limited to specific areas of the city. A limited repeal would not help us to move the needle on our RHNA obligation. If we are going to do it, do it with the intent of achieving the goal of increasing affordability not protecting exclusivity of certain neighborhoods.

- **How addressed:** The details of the ballot initiative will be developed with significant community outreach, as discussed in Program 2.n., with the goal of facilitating the densities needed to implement the RHNA.

Lastly, we would like to point out that the General Plan Draft action items that provide for affordable housing incentives for "creatives" may not align with fair housing practice and is counter to the goals of the State to increase housing opportunities for all people. Frankly, it's just another legal attempt to keep some people out while encouraging others to come in. We look forward to the public review and comment period for the General Plan and hope that its congruent with the Housing Element, housing equity and inclusion

We thank you for your consideration of these comments and look forward to the implementation of a Housing Element that reflects our values of inclusion, diversity, compassion and equity. We, as South Pasadenans, want to see our City contribute a housing crisis solution by being good Californians and generally decent people.

Sincerely,

Anne Bagasao on behalf of South Pasadena Tenants Union

Comments on the 3rd Draft Housing Element

Yvonne LaRose (November 11, 2022)

The Wednesday night joint Council-Planning Commission meeting brought out and discussed a number of issues in relation to a state mandated 2,065 dwelling units increase. We struggle to meet that requirement.

However, after the meeting, Alan Erlich and I talked. He pointed out that San Marino (which has a smaller population than South Pasadena) is only required to increase its dwelling units by 100. Similarly,

I think Alan mentioned Alhambra, which also has a smaller population than South Pasadena, is being required to increase its dwelling units by 200.

Alan also pointed out the reason for the drastically different requirements of the three cities. It is because South Pasadena is considered to be a transportation rich city due to the fact that the Gold Line passes through it.

While it is definitely true that the Gold Line is part of a reliable rail system of public transportation that's available on a 24-hour, 7 days a week, at 15 to 20 minute intervals, and the line does, indeed, pass through an area near the heart of the city, it deposits passengers at a public transportation bus stop (MTA Line 258) that is essentially an afterthought.

Line 258 runs every 60 minutes along Mission Street, Monday through Friday. It is not operational on Saturday or Sunday. It has 29 stops; among them are CSULA, where it appears it only stops two times, at 9:23 PM and 10:23 PM. Of the three routes it offers, one terminates at Avenue 63 and York Bl. as it passes along South Pasadena via Mission Street.

South Pasadena also has the benefit of MTA Line 260 which runs the length of Fair Oaks from the Alhambra border, through South Pasadena (past Huntington Hospital), and then into Pasadena. That line runs every everyday, starting from the Artesia Station at 4:21 AM and ends at 10:31 PM. at approximately 15 to 20-minute intervals.

South Pasadena offers its residents who are seniors and/or disabled transportation five days a week (Monday through Friday) from 8:30 AM to 4:00 PM via Dial a Ride. We have learned through the Community Services highlight during a Council meeting that the new scheduler considers all passengers are interested in getting to medical appointments or shopping, typically for groceries. The scheduler will confirm a reservation but makes an independent, subjective determination as to whether the reservation should be honored and will (sometimes without notice to the passenger) cancel or change a reservation, leaving the client without transport and needing to change their business itinerary and appointments for that day unless they are able to use an alternative transportation service.

Dial a Ride has become a dismally unreliable means of transportation in and around South Pasadena.

While there are other transportation alternatives such as Uber, Lyft, Access, or taxi, the above three public transportation systems constitute the "rich transportation" of South Pasadena. Given the limited availability of the City's staple transportation, it can be said with accuracy that South Pasadena is definitely not a transportation rich city.

Based on this analysis, the City should challenge the requirement to develop 2,065 units. The burden on a city of 2.5 square miles is too great. The "rich transportation" is imaginary. What does exist can barely support the 25,000 residents; to add even 2,000 additional people (let alone dwelling units) would overtax all of the City's resources.

Viva

Yvonne LaRose

Organization Development Consultant: Diversity/Title VII, Harassment, Ethics

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The Desk - http://thedesk.wordpress.com

Cell: 626-606-4677

- **How addressed:** There are many different factors that are taken into account when determining a City's Regional Housing Needs Assessment, including the proximity to jobs and transit access. The City was allocated 2,067 units after the reallocations by SCAG after several agencies made various appeals and many factors were weighted. The City is addressing the full amount of its share of housing needs as determined through the RHNA process, and this Housing Element has been drafted to meet those housing needs.

Yvonne LaRose (November 12, 2022)

It seems Agenda Items 3.3 and 3.4 had exhibits to be used with them. Those exhibits were not in the Council chamber when the meeting started. Perhaps they were available at the booth in the lobby of City Hall. The lack of such exhibits for the public made grasping all of the proposed details difficult to navigate. Some members of the audience had questions about the proposed changes but were unable to present those questions and concerns. Frustration was the result.

One of the properties involves Foremost Liquor at Monterey Rd. and Pasadena Ave. The proposition is to remove that structure and convert the property into a different type of use, possibly residential. The issue with that prospect is that is the only convenience store in the area and appears to generate more business and revenue than the small businesses on the west side of Monterey Road. Perhaps there are other alternatives to removing that business. Interpretation of the proposed change seemed to be tear out the liquor store and rebuild with a multi-use/family dwelling.

- **How addressed:** Foremost Liquor (Site 5 in Appendix A) will be rezoned as part of the larger Ostrich Farm Mixed-Use area to remove barriers to and incentivize the production of housing units. The City is not "tearing out" the liquor store. This mixed-use area will include additional retail opportunities for the west side of the city, which may include a liquor store.

There was also discussion of the Pavilion's parking lot. The proposal is to resurface the parking lot (which was recently completed), install additional parking, as well as build a residential building on the lot. No one in the audience could envision a dwelling unit on that lot that would aesthetically blend in with the area. There also seems to be quite limited space for a proposed dwelling unit in that location. The proposed changes do not appear to be feasible.

- **How addressed:** The Pavilions parking lot (Site 16 in Appendix A) is approximately 2.67 acres of flat land within a transit rich area. As discussed in the letter from the property owner, the owner intends to redevelop the entire site with a new store which would include a housing component. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Moving just one-half block to the south of the Pavilion's site is Golden Oaks Restaurant, which is also proposed as a site for demolition and erection of a multi-unit dwelling, plus parking spaces. Again, the aesthetics of that type of change is questionable, not to mention there is scant space to make those types of changes.

- **How addressed:** Aesthetics are not an issue that is considered or addressed under state law in the Housing Element. Such issues are addressed through zoning regulations such as the Downtown Specific Plan that will come after the Housing Element indicates were to locate housing resources. Parking is not required in this area due to recently enacted state law under AB 2097 prohibiting cities from imposing minimum parking standards for residential and commercial projects within one-half mile from public transit. Program 3.b has been revised to commit the City to updating its zoning code to conform to the parking standards set by state law.

It sounded as though the Public Works yard is also being planned for renovation and demolition. It's troubling to try to understand where Public Works will be located if their base is removed. Perhaps what was missed in the interpretation of the proposal is that the yard will somehow be upgraded (perhaps with more energy refueling pumps) and remain in the same location.

- **How addressed:** The City's existing Capital Improvement Program includes a list of sites suitable for relocation of the activities currently conducted at the Public Works yard. The City intends to vacate the Public Works Department from this site so it can be redeveloped as affordable housing with no Public Works activities remaining on the site.

These are the proposals that more significantly stand out in my recollection of Wednesday's meeting.

Viva

Yvonne LaRose

Cell: 626-606-4677

Josh Albrektson (November 21, 2022)

For APN 5308034015 this is on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308034015 has been removed from the Housing Element.

Josh Albrektson (November 21, 2022)

1131 El Centro St is a 3 story condo complex built in 1988. You guys cite it as an example of buildings recently built in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1131 El Centro St. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1131 El Centro St. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that these 34 year old builds are redeveloped during the planning period.

Josh Albrektson (November 21, 2022)

700 Orange Grove Ave is a 3 story Condo Complex built 20 years ago. You guys are claiming there is a chance that this 3 story Condo Complex might be torn down for a replacement 3 story apartment building. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 700 Orange Grove Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 700 Orange Grove Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The possibility exists, and that the Housing Element programs make it more likely, that these 20 year old builds are redeveloped during the planning period.

Josh Albrektson (November 21, 2022)

For APN 5314020007, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** There is an existing public driveway that provides access to APN 5314020007

Josh Albrektson (November 21, 2022)

715 Prospect Ave and 807 Prospect Ave are 2 story apartment buildings. You guys are claiming there is a chance that they might be torn down for 3 story apartments. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 715 Prospect Ave. and 807 Prospect Ave. are not identified sites for affordable housing production. 715 Prospect Ave. and 807 Prospect Ave. are part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The Housing Element simply says that the possibility exists, and that the Housing Element programs make it more likely, that these sites will be redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

Every single house in the next two pictures are single family homes that South Pasadena claims will be torn down and replaced with a low income unit. By law, south Pasadena is required to subtract the current unit count from any potential future unit count, so for all of these they should not be able to claim any housing.

- **How addressed:** Images were not provided as part of this comment. It is unclear which single family homes are being discussed in this comment.

For every current housing site in the downtown specific plan South Pasadena didn't subtract the current units on the site as required by law. For example at 820 Mission there is a 38 unit condo complex. South Pasadena is claiming 17 units at this site and not subtracting any of the current condos.

This is the case for 50 of the sites claimed in the Downtown Specific Plan.

Sent from my iPad

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The projected number of units for 820 Mission St. does subtract the existing dwelling units from the calculation of the projected net increase in housing units on the site. The site is an approximately 1.75 acre and is located in the proposed Downtown Specific Plan area. This area will allow for a maximum of 70 du/ac, which means the site will accommodate up to 122 dwelling units. As mentioned in the comment, there are currently 38 existing units on the site, which would net 84 housing units if it were to be redeveloped. The analysis of the Downtown Specific Plan anticipates there is a 20% likelihood that a parcel in the Downtown Specific Plan is redeveloped. Twenty percent of 84 housing units is 16.8, which was rounded to 17 as the number of net new housing units anticipated on the site prorated for the likelihood of redevelopment of the site.

Josh Albrektson (November 22, 2022)

All page numbers refer to the 3rd draft page numbers

For APN 5315021008 on page 191 South Pasadena claims 27 units on a 0.57 lot. This is the southern part of the mission meridian complex built in 2006 and there are already 23 units on this lot.

For APN 5315021031 on page 191 SoPas claims 20 units on a 0.45 lot. This is the middle part of the Mission Meridian complex built in 2006 and there are already 20 units on this lot.

For APN 5315021051 on page 188 SoPas claims 24 units on a 0.65 acre lot. This is the north part of the Mission Meridian complex built in 2006 that already has 23 condos on the lot.

For APN 5315007055 on page 185, SoPas claims 22 units on a 0.91 acre lot. This is a 21 unit condo complex built in 1988.--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Each of these lots are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 22, 2022)

On page 193 it is claimed that the realistic capacity is based on 20% of the sites being developed at 100% capacity.

The total acreage is 54.95 acres with a density of 50 DU/acre. This is a maximum capacity of 2748.

20% of 2748 is 550 units, not 642 units as claimed.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The maximum density of the Downtown Specific Plan is 70 du/ac, not 50 du/ac. Table VI-51 has been corrected in the Fourth Draft to reflect the corrected maximum density. Table VI-51 does identify the total acreage of the Downtown Specific Plan area that has the potential to be redeveloped as 54.95 acres. At a density of 70 du/ac, the maximum capacity of this area is 3,846 units. Twenty percent of 3,846 is 769, which is more than the 642 units that is anticipated to be developed in the Downtown Specific Plan area during the planning period.

Josh Albrektson (November 22, 2022)

For APN 5310016028, this is a 15 foot wide lot that is somebody's garden.

https://twitter.com/JalbyMD/status/1538996186765348864?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

https://twitter.com/JalbyMD/status/1538996243224924160?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5310016028 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

1522 Mission Street is the historic Fair Oaks Pharmacy that has been operating for over 100 years. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? What is the substantial evidence the current use will be discontinued as required for low income sites??? It made it 100 years, it is going to close in the next 7??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1522 Mission Street is not an identified site for affordable housing production. 1522 Mission Street is a part of the Downtown Specific Plan area and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

1401 Mission Street is a 3 story condo complex built in 2006. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1401 Mission Street is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 22, 2022)

At 820 Mound Ave the city is about to install electric panels and have a long term lease with SoCal Edison. This was just voted on 3 months ago. Is South Pasadena planning on breaking this lease??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 820 Mound Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 820 Mound Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

For Site 16 you guys claim that only the parking lot will be developed and not the newly renovated grocery store that had a grand re-opening on August 3rd.

You can hear the city council and planning commission trying to explain possible ways that the parking lot could be developed without disrupting the grocery store from 27:00 to 31:00 of the November 9th meeting. They were discussing what they would say that HCD would find acceptable. It is pretty obvious that the owner is not themselves considering developing just the parking lot.

http://www.spectrumstream.com/streaming/south_pasadena/2022_11_09.cfm

How can you guys claim there is substantial evidence that the parking lot will be developed when it is clear from the meeting that the owner is not actually considering it??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner of Site 16 has provided a letter expressing their intention to redevelop the entire site with a new store within the 6th Cycle. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Josh Albrektson (November 22, 2022)

For Site 14 the owner is getting a new foundation for one home and once that homes foundation is finished he is planning on moving on and doing the foundation of the second home. This site is 2 blocks from city hall. You guys can go down and see the Foundation Repair LA INC sign in front of 1508 El Centro right now. Attached to this e-mail is a picture of this sign if it doesn't make it into the comments section of the Housing Element.



How can you guys claim there is substantial evidence that the current use is being discontinued when the current owner of these single family homes is getting two new foundations at this time??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner of Site 14 has confirmed with the city that they are interested in redeveloping the site with multifamily housing.

Josh Albrektson (November 22, 2022)

802 Fair Oaks is the Fair-Hope building and is one of the few remaining early twentieth century structures in South Pasadena Fair Oaks Corridor. This is South Pasadena designated cultural heritage landmark number 49. Are you going to allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 802 Fair Oaks is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 802 Fair Oaks is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 22, 2022)

For APN 5308002059 this is a front yard and driveway

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002059 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

The following APNS do not exist in the Los Angeles County Records and if claims that homes could be built on them they should have APNs that actually exist:

5308023004

5317009909

5310034900

5310018903

5314017901

5314016044

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The APNs identified in this comment have been updated in the Housing Element to reflect the new APNs given to these parcels since the Housing Element was first drafted.

Josh Albrektson (November 22, 2022)

For APN 5311001018, at the Design review board meeting of Sept first a plan was approved for a new commercial building. This site is not eligible to be considered for housing.

https://www.southpasadenaca.gov/home/showpublisheddocument/30612/638000752592000000

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311001018 has been removed from the Housing Element.

Josh Albrektson (November 22, 2022)

The following is a list of single family homes and duplexes that South Pasadena is claiming will be new housing in the 3rd Housing Element/Downtown Specific Plan. In every case you guys are claiming the homes would be torn down and replaced by a low income unit in this planning period without subtracting the original home from your calculations. Sometimes you guys have a duplex that would turn into one low income unit, which is a net -1 home.

You are required to subtract out the original housing and only claim NET housing for RHNA.

Single family homes

515 Mission st

519 Mission St

802 Orange Grove Ave

815 Magnolia

821 Magnolia

827 Magnolia

805 Prospect

700 Prospect

704 Prospect

909 Magnolia

913 Magnolia

806 Meridian

808 Meridian

810 Meridian

1007 Hope St

808 Fairview

806 Fairview

804 Fairview

1103 Hope st

1107 Hope St

1111 Hope St

803 ½ Fremont Ave

807 Fremont Ave

812 El Centro

1011 Mound Ave

825 Brent Ave

Duplexes

706 Prospect

521 Mission St

1115 Hope St

1117 Hope St

1123 Hope St

833 Brent Ave

817 Adelaine

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** All of these properties are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 23, 2022)

1100 El Centro is the South Pasadena Unified School District. They just purchased this building last year and moved all of their offices into this building. What is the substantial evidence the current use will be discontinued as required for low income sites??? Have you talked to anybody at the school district?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1100 El Centro is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1100 El Centro is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For APN 5314018010 it is in the middle of the block and no access.

https://twitter.com/JalbyMD/status/1538994198770339843?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5314018010 is a flag lot that has access to Bank Street.

Josh Albrektson (November 23, 2022)

1050 Fremont Ave is Calvary Presbeterian Church. It is one of the oldest churches in the city, at least 4 stories tall, and probably the best looking church in the city. Would South Pasadena allow this building to be torn down?? What is the substantial evidence the current use will be discontinued as required for

low income sites??? Have they talked to the church? It also has a preschool Monday to Friday which is one of the more popular pre-schools in the city but they are COVID deniers.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1050 Fremont Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1050 Fremont Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

The building at 1019 El Centro is the South Pasadena Bank Building. It is the first bank in the city and is South Pasadena designated cultural heritage landmark number 8. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1019 El Centro is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1019 El Centro is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For Site 16, Can you guys point to examples of grocery stores that have had their parking lot turned into housing while the grocery store remained open??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The property owner for Site 16 has provided a letter expressing their intention to redevelop the entire site with a new store. It is anticipated that the new store will be approximately the same size as the existing store, leaving an area equivalent in size as the parking to for development of parking and residential uses. Appendix A has been updated to reflect this additional information.

Josh Albrektson (November 23, 2022)

1023 Fair Oaks Ave is the historic Rialto Theater. It was built in 1925 and is one of the most historic theaters in San Gabriel Valley. There currently is a lease by Mosaic Church for another 20 years. It is South Pasadena designated cultural heritage landmark number 25. Would South Pasadena allow this historic theater to be torn down?? What is the substantial evidence the current use will be discontinued as required for low income sites???

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1023 Fair Oaks Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1023 Fair Oaks Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 23, 2022)

For APN 5311010065 this is someones front yard

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311010065 has been removed from the Housing Element.

Josh Albrektson (November 24, 2022)

1000 Mission Street is the Century House. It is also where Micheal Myers lived in the movie Halloween. It is the second oldest building In South Pasadena built in 1888 and was South Pasadena designated cultural heritage landmark number 34. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1000 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1000 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 24, 2022)

1500 to 1518 Mission Street were all built over 100 years ago and considered to be part of the historic business district. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? What is the substantial evidence the current use will be discontinued as required for low income sites??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The buildings at 1500 to 1518 Mission Street are not a part of a designated historic district, although they are eligible to become part of a historic district. The buildings at 1500 to 1518 Mission Street are not identified sites for affordable housing production. The buildings at 1500 to 1518 Mission Street are a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The Housing Element simply says that there is a chance that this site is redeveloped during the planning period.

Josh Albrektson (November 24, 2022)

For APN 5314016030, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5314016030 has been removed from the Housing Element.

Josh Albrektson (November 24, 2022)

815 Fairview is a 3 story condo complex built in 2006. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 815 Fairview is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

For APN 5317011025, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5317011025 has been removed from the Housing Element.

Josh Albrektson (November 25, 2022)

For APNs 5308034018, 5308034018, and 5306006001, these are on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034018, 5308034018, and 5306006001 have been removed from the Housing Element.

Josh Albrektson (November 25, 2022)

1501 Mission Street was built in 1923 and is South Pasadena designated cultural heritage landmark number 37. What is the substantial evidence the current use will be discontinued as required for low income sites??? It also has an apartment on top and you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1501 Mission Street is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

804 to 810 fairview and 1103 to 1123 Hope street contained multiple single family homes and apartments. You are required to subtract the current unit count from any proposed unit count.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 804 to 810 Fairview and 1103 to 1123 Hope Street are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 25, 2022)

954 Mission Street is the Mission Hotel and one of the oldest buildings and is considered historic by South Pasadena. It is South Pasadena City Landmark number 26. Is South Pasadena going to allow a

by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 954 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 954 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 25, 2022)

For Low Income site number 3 there are 8 above moderate income units. This is clearly stated on A1-15. There is a duplex on one APN, a duplex on one APN, and a 4 plex on the 4th APN. On Page 183 Table VI-50, instead of putting 2, 2, and 4 as the unit count for Site three, you guys put 8 on one APN and then claimed 7 and 14 low income units on the other APNS that you shouldn't be able to claim. So there are actually 21 low income units you are claiming on Site 3 that you cannot claim. Please remove these 21 units from your calculations.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Table VI-50 has been updated to correct reflect what is shown in Appendix A.

Josh Albrektson (November 26, 2022)

1001 Fremont Ave is the South Pasadena Post Office. It is a historic building and the main Post Office of South Pasadena that includes all sorting for delivered mail. What is the substantial evidence the current use will be discontinued as required for low income sites??? Have you guys talked to anybody at the United States Postal Service??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1001 Fremont Ave is not included in Table VI-51 of the Housing Element. The map in Figure A-3a has been updated to properly reflect the parcels identified in Table VI-51.

Josh Albrektson (November 26, 2022)

For APN 5320018022 this is a silver of land with a homes garden on it.

https://twitter.com/JalbyMD/status/1538998300530970626?s=20&t=5E2YvbfAPxR8AN1ULAtR6Q

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5320018022 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

820 Mission street is a group of Condos that were built in 2017. You actually site them as representative examples of recent building. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** See discussion of 820 Mission Street in response to comment dated November 22, 2022.

Josh Albrektson (November 26, 2022)

For APN 5311017018, there is half a home on the land

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311017018 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

For APN 5320030038, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5320030038 has been removed from the Housing Element.

Josh Albrektson (November 26, 2022)

For APN 5311006068 there is a home on the land

https://www.redfin.com/CA/South-Pasadena/1250-Oak-Hill-Ave-91030/home/7003471

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5311006068 has been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

For the following APNs there is no street access:

5311010028

5311010029

5311010030

5311010033

5311010034

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As noted in Notes 3 to Table VI-44, These parcels are part of a potential project to develop duplexes and townhouses on all of these parcels by the same developer who has purchased all of the parcels. The City has confirmed that there is access to this set of parcels. The parcels include 10 vacant parcels and one nonvacant parcel.

Josh Albrektson (November 27, 2022)

For APNs 5308034017 and 5308034003 these are on a mountain with no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034017 and 5308034003 have been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

913 Meridian Street is the historic Meridian Iron Works Building. It was a Japanese history museum but when South Pasadena kicked their Japanese residents out of the city in 1942 it was confiscated. It is now the home of the South Pasadena Preservation Foundation. It was built in 1887 and is City Landmark number 5. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued as required for a low income site?? Will South Pasadena allow it to be torn down?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 913 Meridian Street is not included in Table VI-51 of the Housing Element. The map in Figure A-3a has been updated to properly reflect the parcels identified in Table VI-51.

Josh Albrektson (November 27, 2022)

For APNs 5312016016 and 5308021009, these are on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5312016016 and 5308021009 have been removed from the Housing Element.

Josh Albrektson (November 27, 2022)

920 Fremont Ave is Grace Brethren Church. The building was built in 1907 and is City Landmark number 22. Would South Pasadena allow this building to be torn down?? What is the substantial evidence the current use will be discontinued as required for low income sites??? Have they talked to the church?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 920 Fremont Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 920 Fremont Ave is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 27, 2022)

Baranger Studios at 729 Mission St is one of the oldest buildings in South Pasadena and considered Historic by South Pasadena standards. It is South Pasadena designated cultural heritage landmark number 27. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

https://www.pasadenanow.com/weekendr/historic-iconic-baranger-studios-building-in-south-pasadena-is-sold-for-6-8-million/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 729 Mission St is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 729 Mission St is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 28, 2022)

812 Fremont is a 3 story condo complex. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 812 Fremont Avenue is located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5308002064, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002064 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5317009903, the actual APN is 5317009033 and this is someone's garden.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5317009903 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

824 FairOaks is the Comerica Bank Building. It is one of the oldest buildings in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Would South Pasadena allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 824 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 824 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 28, 2022)

For APN 5308022009, there is a home on the land (real APN of 5308022043

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308022009 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5312031029 there is a home on the land

https://www.redfin.com/CA/SOUTH-PASADENA/20-SHORT-WAY-ST-91030/home/7004227

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5312031029 has been removed from the Housing Element.

Josh Albrektson (November 28, 2022)

For APN 5308019034 this has a home and backyard on it

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308019034 is a developable lot between two existing homes. Currently it contains a patio structure for one of the neighboring homes.

Josh Albrektson (November 28, 2022)

812 Orange Grove, 810 Orange Grove and 802 Orange Grove are all 2 story apartment buildings. You guys are claiming there is a chance that they might be torn down for 3 story apartments. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 812 Orange Grove, 810 Orange Grove and 802 Orange Grove are not identified sites for affordable housing production. 812 Orange Grove, 810 Orange Grove and 802 Orange Grove are a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The Housing Element simply says that there is a chance that this site is redeveloped during the planning period. The Downtown Specific Plan will allow for heights at least six stories or 60 feet, in accordance with Program 2.n.

Josh Albrektson (November 28, 2022)

For Low income site number 12 the city only owns 0.19 acres (35%) of the site. This is not large enough for a low income site. If the city does not have ownership of the whole site by Jan first, 2026, would it be willing to remove it as a low income site?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Program 3.o requires the City to evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites no later than December 31, 2024 and December 31, 2026. Site 12 will be part of this review and evaluation.

Josh Albrektson (November 28, 2022)

The block surrounded by Meridian, El Centro, Diamond, and Mission street is a national historic district and has been since 1983. These buildings cannot be torn down.

https://catalog.archives.gov/id/123859524

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** While some of the building on this block are identified in the National Registrar of Historic Places with local historic significance, some of the buildings in this block have been deemed to not contribute to the historic character of the district. Furthermore, buildings identified as historic identified in the National Registrar of Historic Places can be adaptively reused (see Program 3.b) and added on to so long as the character defining features of the existing structures remain.

Josh Albrektson (November 28, 2022)

1200 Fair Oaks is an Arco station that was recently sold. In the listing brochure it mentioned that Arco has a 15 year lease on the property. What is the substantial evidence the current use will be discontinued as required for low income sites???

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1200 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1200 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

For APN 5308034016 and 5308021008 this is on a mountain and has no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5308034016 and 5308021008 have been removed from the Housing Element.

Josh Albrektson (November 29, 2022)

700 Orange Grove Ave is a 3 story apartment building. You guys are claiming there is a chance that this 3 story apartment building might be torn down for a replacement 3 story apartment building. Can you guys point to a place where this has happened somewhere else?? What is the substantial evidence the current use will be discontinued as required for low income sites??? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As addressed in the response to comment dated November 21, 2022, 700 Orange Grove Ave. is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 700 Orange Grove Ave. is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process, including a voter approved modification of the citywide height limit to allow for the construction of buildings on this site taller than three stories. The

possibility exists, and that the Housing Element programs make it more likely, that these 20 year old builds are redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

For APN 5308002072, this is in the middle of the block and there is no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APN 5308002072 is a buildable lot that has existing driveway access through APN 5308002060.

Josh Albrektson (November 29, 2022)

The former bank at 901 Fair Oaks Ave just underwent an extensive renovation changing it from a Bank to 5 commercial units including Chiptole and Habit Burger (which I eat at 4 times a week). An ATT store just opened and Rice and Nuri is about to open in the next couple of months. What is the substantial evidence the current use will be discontinued as required for low income sites???

https://southpasadenan.com/fairoaksmission-project-chipotle-coming-to-south-pasadena/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 901 Fair Oaks Avenue is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 901 Fair Oaks Avenue is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

Lewis Markey building at 634 Mission Street is the South Pasadena designated cultural heritage landmark number 31. It was built in 1928 and was designated a landmark 35 years ago. Is South Pasadena going to allow a by right housing project on this site if it is 20% low income????? Is there substantial evidence the current use will be discontinued??

https://calisphere.org/item/e5794b9f06005a528fedab717bb7332b/

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 634 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 634 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 29, 2022)

The Trader Joes at 613 Mission is the second Trader Joes in history. It is also one of the most active grocery stores in the city. What is the substantial evidence the current use will be discontinued as required for low income sites??? And you also removed this site in previous drafts because you didn't believe the current use would turn over.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 613 Mission Street is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 613 Mission Street is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 30, 2022)

For Low Income Site number 8 you describe an underground gasoline tank and soil contamination. How much would it actually cost to remediate the site?? Can you find costs or similar sites that have been used for housing?? And there is no 0.71 acres of extra land in South Pasadena that the public works yard could be moved to. Is South Pasadena willing to state that there will be a RFP issued by Jan first, 2025 and if there is no plans for housing by Jan 2026 than the site would be removed as a possible site?

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Appendix A has been revised with additional information regarding the environmental constraints for Site 8. Program 3.o has been modified to require the City to "evaluate the effectiveness of identified sites and make adjustment as necessary such as increasing densities, modifying development standards, removing sites and rezoning additional sites" no later than December 31, 2024 and December 31, 2026.

Josh Albrektson (November 30, 2022)

For APNs 5311010027 and 5308006024 these are on a mountain with no street access

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** APNs 5311010027 and 5308006024 have been removed from the Housing Element.

Josh Albrektson (November 30, 2022)

For Low income site Number 2 there is a claim that Bullseye Glass and Judson studios are relatively new tenants. If you label the 6 buildings from west to east, these are buildings 1 and 2.

Those Bullseye and Judson have been there since November 2016 as shown in this google image:

https://goo.gl/maps/s95ehqP1Z7uUU8ZBA

It is actually the entire second floor of building number 3 and the entire building number 5 that just were leased in the past year to Yellow Pike Media and Elementary. How can you guys claim there is substantial evidence that the current uses will be discontinued when there were just new leases signed at the site??

Loopnet Brochure for the listings for buildings 3 and 5.

https://images1.loopnet.com/d2/NjuUcEIzCBdbskuj3g5Mj_3zqct3H2jyorx1Mu5ckGw/149161PasadenaSouthPasadenaBrochure.pdf

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As stated in Appendix A, Site 2 is an under-utilized commercial building that will be redesignated as mixed-use. The land owner has expressed interest in redeveloping the site under the new land use, once adopted.

Josh Albrektson (November 30, 2022)

707 to 809 Meridian is a 3 story condo complex built in 2006. You guys cite it as an example of buildings recently built in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Are they going to tear down new condos for new condos?? And you are required to subtract the current apartments from the proposed apartments for your counting of units.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 707 to 809 Meridian is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 707 to 809 Meridian is a part of the Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Josh Albrektson (November 30, 2022)

1124 Fair Oaks Ave is a 3 story Freemason building. It is one of the oldest buildings in South Pasadena. What is the substantial evidence the current use will be discontinued as required for low income sites??? Would South Pasadena allow it to be torn down??

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** 1124 Fair Oaks Ave is not an identified site for affordable housing production and therefore the Housing Element does not need to show there is substantial evidence that the existing use will discontinue during the planning period. 1124 Fair Oaks Ave is a part of the

Downtown Specific Plan area. An area-wide analysis was conducted of the Downtown Specific Plan where it is expected that some portion of the area will be redeveloped during the planning cycle due to the adoption of the new Downtown Specific Plan and policies implemented as part of the Housing Element update process. The possibility exists, and that the Housing Element programs make it more likely, that this site is redeveloped during the planning period.

Sam Shink, The Albertsons Companies (December 1, 2022)



WRITER'S TELEPHONE NUMBER: (714) 300-6727
WRITER'S E-MAIL: SAM.SHINK1@SAFEWAY.COM

December 1, 2022

Angelica Frausto-Lupo
Community Development Director
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Via Hand Delivery

Subject: Pavilions #2228; 1213 South Fair Oaks Avenue, South Pasadena

Dear Ms. Frausto-Lupo:

I am writing in response to your request related to the City's draft General Plan Housing Element to advise you that ACI, parent company of Pavilions, is considering redevelopment of the subject property sometime prior to 2029. The plans being considered include redevelopment of the entire site and would consist of a new store, residential uses, and parking. We look forward to continuing to serve the residents of South Pasadena.

Very truly yours,

SAM SHINK
Director of Real Estate

letter to city of SP regarding redevelopment plans

Working together to be the *favorite local supermarket*™

Amigos · United Express · Randalls · Albertsons · SAFEWAY · Tom Thumb · PAVILIONS · shaw's
ACME · star market · CARRS · Market STREET · VONS · Jewel Osco · United supermarkets · Lucky · Albertsons market · SUPER SAVER Means Low Prices!

- **How addressed:** Appendix A has been updated with additional information from property owner.

Mark Gallatin (December 5, 2022)

I would respectfully like to suggest the following alternate language for that found on page 216 of the September 2022 Draft Housing Element:

Program 1.b. - Convert Caltrans Homes to Affordable Housing

The City will leverage the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital to create new and rehabilitated, deed restricted, affordable housing units throughout the city. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible strategies, including but not limited to, partnerships with non-profit affordable housing developers, to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

- **How addressed:** As detailed in Program 1.b, the City is complying with the acquisition process authorized by SB 381 for the acquisition of the surplus Caltrans properties. The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time.

Comments on the Public Review 4th Draft Housing Element

Josh Albrektson (December 5, 2022)

Page A1-11 has an outdated picture

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The map on page A1-11 has been updated.

Josh Albrektson (December 5, 2022)

The following APNS you are claiming 100% chance of 100% development in the downtown specific plans, including the Mission Meridian condos:

Page 187, the condos behind the post office you are claiming 22 condos will turn into 22 low income units

5315007055

The following 3 are the mission meridian Condos that you are claiming a 1 for 1 replacement with low income units.

Page 190

5315021051

Page 193

5315021008

5315021031

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** As addressed in the response to the comment dated November 22, 2022 regarding these same parcels, each of these lots are located in the Downtown Specific Plan area, where an area-wide analysis was conducted. As discussed above for 820 Mission St., the number of existing units was removed from the projected calculation of net new units being claimed in the Housing Element..

Delaine Shane (December 6, 2022)

To the Housing Element Consultant and City Management:

Enclosed are my comments pertaining to the red-lined version of the Draft Housing Element, Version 4. Frankly, I didn't read your recent document—just skimmed it. No realistic time was given to us to allow for a thoughtful read through. In addition, while I appreciated the City's turnout at our most

recent walk through in the Meridian neighborhood that has several of the vacant Caltrans properties, having the Consultant snap a picture of us and marking that check box as being part of public engagement is a false narrative.

A mindset at City Hall continues to exist, as exhibited in this draft document, that the non-legislative alternative to SB 381 and the Caltrans properties is either non-existent or illegal. It is NOT illegal. I and others have already provided you with information readily available on the internet that it has been done and can be done in California by government entities.

Nothing in Caltrans' regulations prevents that agency from implementing the non-legislative alternative that the South Pasadena Preservation Foundation has so clearly prepared and presented to the City on numerous occasions. Just because Caltrans says NO? So, why aren't our City officials meeting with our state legislators to convince Caltrans otherwise? This wouldn't be the first time that Caltrans is misusing its powers to the detriment of our community. I and my neighbors expect that our City management and Consultant support us and not dictate a choice that they themselves would not appreciate if they lived in our community.

All we want are for the vacant properties to be sold to qualified buyers (be they present/former Caltrans tenants or other qualified buyers) who will fix up their homes, live in them, pay their fair share of property taxes, and contribute to our wonderful and diverse neighborhood. This can still happen if the Housing Element is revised to include the very viable non-legislative alternative to SB 381, i.e., side-by-side escrow agreements. These properties were what the Freeway Fighters were fighting to preserve for over 60 years. It would be a harsh and cruel irony if the houses were torn down not by Caltrans but by the City or its designees (HREs).

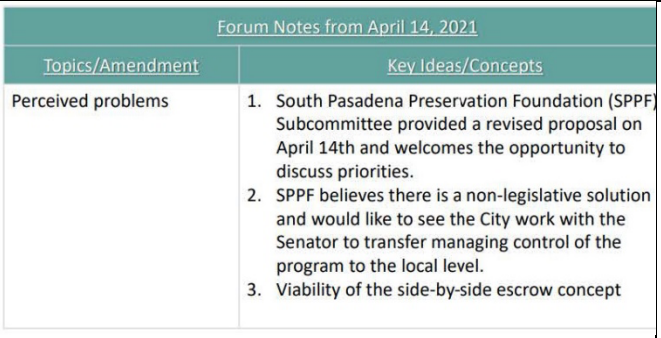
Sincerely,

Delaine Shane

2003 Meridian Avenue

[Continued on next page]

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
1	2-3	"SB 381 requires that Caltrans offer unoccupied homes for sale to the City of South Pasadena. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE)."	This statement does not include the non-legislative approach on the disposition of vacant Caltrans housing that the South Pasadena Preservation Plan (SPPP) has been presenting to the City of South Pasadena (City). That is, the more efficient, economic, and expeditious process of side-by-side escrow agreements for unoccupied homes. Yes, this section of the Housing Element is on legislation; however, MANY discussions between the City and the public also concerned a parallel track involving a viable non-legislative track in conjunction with SB 381. The City did agree to consider this non-legislative approach during previous discussions between the City Council and Ad Hoc Committees. This process is legal and is done by other governmental entities. If Caltrans is not interested in such an approach, why isn't our City Council seeking relief on this matter with our newly elected State Assembly Member Michael Fong or other prominent state legislators? Getting entangled in a large real estate portfolio and process could result in the City Council not meeting its other mandates to its residents. As a reminder, here is a slide from the City Council Agenda, Item No. 14, July 21, 2021 (though I vehemently disagree that this is a "perceived problem"):	SB 381, which the City supported, provides a framework for Caltrans to sell its surplus property in South Pasadena. If the City does not purchase the properties, it is expected that Caltrans will offer them to the Los Angeles County Development Authority and then on to other parties identified in the law. Caltrans must offer these homes for sale in accordance with SB 381, other options do no exist under existing law.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
			 Forum Notes from April 14, 2021 Topics/Amendment: Perceived problems Key Ideas/Concepts: 1. South Pasadena Preservation Foundation (SPPF) Subcommittee provided a revised proposal on April 14th and welcomes the opportunity to discuss priorities. 2. SPPF believes there is a non-legislative solution and would like to see the City work with the Senator to transfer managing control of the program to the local level. 3. Viability of the side-by-side escrow concept The City should behave as a pass through to allow current/former tenants and/or qualified home buyers and not get into the real estate developer's market nor sell to HREs. Our community want the homes to be returned to homeowners that meet the criteria of the Roberti Act so that these properties return to the tax roll. Sixty plus years of these Caltrans homes have yielded NO PROPERTY TAXES! It is time for this situation to be changed by relying on side-by-side escrows. THEY ARE NOT ILLEGAL!!! Specific text should be added to the fourth version of the Housing Element that includes the option of side-by-side escrows.	
2	3	"AB 2011, the Affordable Housing and High Road Jobs Act of 2022, was signed into law on September 28, 2022. AB 2011 allows for ministerial, by-right approval of affordable housing on commercially-zoned lands, and allows for mixed-income	How does the City intend to be a good steward of our precious historic resources in light of AB 2011? What protections will there be for the City's approved historic landmarks and potentially historic structures have in commercially zoned lands? It is difficult to view specifics in Appendix A as to which structures would fall under AB 2011, but I have been told that the Kaldi's Coffee building could	AB 2011 does not apply to projects where, "the development would require the demolition of a historic structure that was placed on a national, state, or local historic register."

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
		housing along commercial corridors so long as the project meets certain labor and environmental criteria."	be vulnerable to being torn down. This is the City's first bank and still retains its integrity, association, and context from a historic perspective. Does that mean that many of our landmarks whether on the City's list or not, can be destroyed? Also, what is meant specifically by the phrase "…certain labor and environmental criteria?' This is a legal document and one which will be available to the public. The residents do not necessarily have the time or the opportunity to cross check AB 2011 with other documents to understand what this means or what the ramifications are for them and for the City.	
3	5	Program 1.b - Convert Caltrans Homes to Affordable Housing "The California Department of Transportation (Caltrans) is obligated by State law to offer unoccupied Caltrans-owned surplus residential properties located in South Pasadena for sale to the City of South Pasadena. The City has expressed interest to Caltrans in purchasing these twenty (20) unoccupied surplus properties through this State program, which contain twenty-two (22)	Please clarify the text -- will this conversion program result in rental property or home ownership? My neighbors and I support affordable home ownership for these vacant homes where the owners will fix the houses up and live in them and contribute to the well being of our neighborhood, which is quite diversified. The homeowners, like us, will then be paying property taxes. Currently, Caltrans pays zero in property taxes. The vast numbers of these vacant houses are in the southwestern portion of the City. If they go to HREs, then the houses will continue to not be on the tax rolls. The neighborhood will continue to be disproportionately impacted due to the legacy of the SR 710 Extension Project.	These decisions regarding whether the homes will be for-sale or rental, or whether an HRE will be involved in the renovation or other aspects of the project, have not been made by the City at this time.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
		housing units. If the City does not purchase the properties, Caltrans will offer them for sale to the Los Angeles County Development Authority (LACDA), and if LACDA does not purchase the homes, they will be offered to a Housing Related Entity (HRE). State law requires Caltrans to place a deed restriction on these surplus properties ensuring that they are made available for purchase by moderate-income households or for rent to lower income households to moderate or lower income households. Through this Program, if economically feasible, the City will preserve and rehabilitate these properties, and make them available to moderate and lower income households."	This program is biased and not equitable where affordable housing should be distributed throughout the City. The City Council has already approved several large mixed-use developments with NO affordable units (except for Mr. Odom Stamp's project at 625 S. Fair Oaks Avenue). Yet, these Caltrans homes that have been allowed to deteriorate over the decades are being considered as affordable rentals rather than as affordable home ownership that will put these properties back on the tax roll. The City should NOT be involved with rehabilitating these homes. Our streets have not been paved for decades, the failing West Side Reservoir is a human disaster waiting to happen, we don't have decent street lighting, we deal with speeders that don't even live in our neighborhoods but wear out our pot-holed and ever deepening cracks (which in turn will impact existing substructures embedded below the streets), etc. How can the City consider funding this program through the General Funds or relying on HREs? Why not provide the residents who live here now with the services that we deserve. As mentioned in Comment No. 1, the City should employ the non-legislative approach, i.e., the side-by-side escrow agreements. The City has had issues with HREs in the past who don't take responsibility in managing their properties, not to mention the loss in tax revenues to the state and City. There is also nothing	

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
			mentioned about providing security of the Caltrans houses between the times of the purchases by the City and the properties eventual sales. We have been living in fear with the brazenness of squatters and more importantly the danger that these decrepit houses pose, including faulty electrical wiring, mold, asbestos, sewage spills/leaks, etc. that could be released should the squatters inadvertently initiate a catastrophic event. Our houses are so close together that we fear our homes would suffer whatever happens to the nearby Caltrans homes caused by squatters. There is nothing here in this document that alleviates our concerns about our safety.	
4	62	"Development may have also been hindered by the City's decades-long struggle to reverse the planned 71 Freeway extension, which was finally cancelled by Caltrans."	The "71 Freeway"? I've noticed a lot of spelling errors throughout the document. We are paying the consultants a lot of money to write properly. "Cancelled by" Caltrans? A number of individuals, organizations, and municipalities rose up and fought against this useless project and Caltrans for decades. This statement makes it seem as if Caltrans just changed its mind. Revise this statement to interject reality and accuracy.	The identified typo has been corrected.
5	63	"These incentives include height increases and waivers from setbacks, floor area ratios, parking, and other requirements for eligible residential projects."	The author was originally correct by stating "concessions" rather than the revision to "incentives." What are the eligible residential projects? List specifics and how much is the City giving away to the developers? Will there be any yards in the future for new housing? Where will the cars be parked since most residents will still be using their own transportation, whether gas powered or	The identified changes to development standards are incentives for projects to include affordable units. These incentives are required by State law.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
			electric powered? How tall will the height increases be? Does our Fire Department have the capability to put out fires on high rise buildings?	
6	209	"Caltrans has initiated a three-phased property sales program for the 710 surplus properties. Staff continues to work with representatives of Caltrans, California Department of Housing and Community Development, and the California State Transportation Agency to discuss potential affordable housing strategies. The City is also working on a plan to take advantages of opportunities provided in SB381 to procure surplus properties in order to enable affordable housing development. A new housing division is being established in the Community Development Department to develop and administer affordable housing including these efforts. "Funding has been secured for a feasibility study on	Same comment as in Comment No. 1. No mention about the non-legislative and legitimate approach of relying on side-by-side escrow agreements. And just what will the Housing Division do when "administrating affording housing?" Will the City or its designee, an HRE, manage the affordable units, collect the rent, and maintain the units? How can that be when so much of our neighborhood needs vital services and maintenance activities now? The City is not qualified to handle this major endeavor and to pass it to an HRE will just be a repeat of Caltrans' past behavior.	SB 381, which the City supported, provides a framework for Caltrans to sell its surplus property in South Pasadena. If the City does not purchase the properties, it is expected that Caltrans will offer them to the Los Angeles County Development Authority and then on to other parties identified in the law. Caltrans must offer these homes for sale in accordance with SB 381, other options do not exist under existing law.

Comment Nos.	Page Nos.	Statements of Concern in Red-lined Version	Public Comments on Draft Housing Element's Statements (Version 4-Red-lined)	City Response
		surplus Caltrans properties available to be converted to permanent affordable housing ($30,000 – Measure H)."		
7	219-220	Discussion related to Program 1.b - Convert Caltrans Homes to Affordable Housing	Same comment as Comment No. 3. Security costs will be excessive with respect to the program and to date those costs have not been estimated. Occupancy by October 2024 is also overly optimistic. Given the bureaucratic processes of both agencies, the costs and distribution of supplies and equipment, labor availability, the unanticipated repairs that are yet to be discovered until rehabilitation occurs, and the requirement that if HREs are involved that they can pay prevailing labor wages is naïve thinking at best when dealing with renovation projects of this magnitude. Selling these properties immediately in side-by-side escrows will substantially alleviate the risks to the City and will enable the City to focus on existing and urgent City matters and services. As yet again a reminder, just look at the snail's pace of the City in turning two vacant former Caltrans lots into pocket parks. Several years have passed and the City is still working with designers/engineers with no results at this time. Imagine if security was focused on those sites? Such costs would be astronomical.	The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time.

South Pasadena Tenants Union and Care First (December 8, 2022)

City of South Pasadena
Community Development Department
afraustolupo@southpasadenaca.gov
grant@mobius-planning.com

CC: California Housing and Community Development
Paul.McDougall@hcd.ca.gov
Connor.finney@hcd.ca.gov

Regarding: South Pasadena Housing Element, Fourth Draft

Dear Ms. Frausto-Lupo,

Care First South Pasadena and the South Pasadena Tenants Union write jointly to provide feedback about South Pasadena's third draft of the Housing Element.

Executive Summary

- South Pasadena should develop affordable housing throughout the City to create income diverse neighborhoods and promote fair housing. We want the City to:
    - Use the 20 vacant Caltrans house sites,[1] which the City will purchase in the coming months, to develop a blend of duplexes, triplexes, quads, and denser multi unit buildings for affordable ownership and rental opportunities. A number of the vacant houses are 0.25-0.50 acres and could accommodate multi-unit development.
    - Pilot an affordable ADU program, like the Backyard Homes project in Northeast Los Angeles (https://www.mas.la/affordable-adus).
    - Recruit 100% affordable developments through non-profit low-income housing developers, identify at least four (4) viable locations for 100% affordable developments, and identify potential financial and regulatory incentives the city could offer such developers.
- South Pasadena should take more steps to support and protect renters and maintain availability of existing below-market units, including:
    - Enact an urgency ordinance before January 1, 2023 to amend South Pasadena's no-cause eviction ordinance to require landlords to pay tenants increased relocation assistance if they are being evicted.
    - Offer financial assistance to low- and moderate-income tenants and prospective tenants, including Section 8 voucher holders, for security deposits and rent.
    - Enact a rent control ordinance.
    - Fund improvements at below-market rental units in exchange for landlords' covenants not to evict existing tenants or raise rents excessively.

I. Promoting Affordable and Fair Housing Development

The Housing Element determined that the City's "prior race and ethnicbased socio-economic discrimination had a long-term impact on racial diversity in the City" which is only 3.6% Black or African

[1] For a sites inventory of the vacant Caltrans properties, see a map we created at https://www.google.com/maps/d/viewer?mid=1nt13dEdP-7ddQxN85ewo35xhQEKD-kc&ll=34.11207520783854%2C-118.1570014&z=15 (last updated Dec. 7, 2012).

American and only 18.5% Latinx. (Redline of Fourth Draft Housing Element at 39). Limiting multifamily development has made South Pasadena unaffordable, which contributes to the City's lack of diversity. Zoning data from August 2021 revealed that approximately 75% of all residentially zoned land in South Pasadena is zoned exclusively for one or two dwelling units per parcel that do not allow for higher density housing such as apartments or condominiums (Id. at 104). Jurisdictions with the highest proportion of exclusively single-family zoning have the highest percentage of White residents and lower rates of diversity generally. (Id.).

During the last housing element cycle, only 10 affordable units were permitted out of 93 new units. The City has not tracked whether any affordable units have, in fact, been developed.

Despite these deeply concerning data, the City's Fourth Draft Housing Element falls far short of what is needed.

Vacant Caltrans Houses. Under SB 381, the City will soon acquire 20 vacant houses currently owned by Caltrans.[2] The houses are dilapidated from years of vacancy and lack of maintenance. They are in residentially-zoned areas. Under SB 381, the houses must become deed-restricted affordable housing for low- or moderate-income people for a period of 45 or 55 years, depending upon whether they become owner occupied housing units or rental units, respectively.

The vacant Caltrans houses represent a monumental opportunity for South Pasadena to expand affordable multifamily housing in South Pasadena, yet they are scarcely mentioned in the Housing Element. The City proposes Program 1b to "preserve and rehabilitate" the vacant houses and make them "available to moderate or lower income households." This program was modified from the Third Draft, but in the wrong direction by committing to "preserve and rehabilitate" the houses.[3]

Care First and the Tenants Union implore the City to:

- Add the vacant Caltrans houses to the site inventory, including data regarding the lot size, year constructed, and historic designation (or not), and maximum potential number of affordable units that could be made available at each site for rental and/or ownership.[4]
- Upzone residentially zoned areas in South Pasadena, including along the 710 corridor, to accommodate denser housing.
- Implement SB 9 and SB 10 at the vacant Caltrans sites by clearing a path for multifamily housing in the form of duplexes, triplexes, quads, and 10-unit buildings where possible.[5]

[2] Following this first phase of acquisition, the City will likely have future opportunities to purchase more Caltrans homes if they are refused by current occupants. To prepare for this near future, the City should apply a similar framework as we propose here for the conversion of these properties into multi-unit affordable housing, while preventing displacement or meeting the housing needs of current tenants. The City should account for these plans in the Housing Element.

[3] The significance of this change, though seemingly minor, is that the South Pasadena Preservation Foundation has been lobbying the City to bypass SB 381 and sell all 20 vacant Caltrans properties at fair market value to private buyers who would restore them as single-family houses. At a City Council meeting on December 7, 2022, the Chair of the City's Cultural Heritage Commission told the City Council that he has petitioned to add all the Caltrans houses to the national historic registry. The City Council is capitulating to the demand that it "preserve and rehabilitate" the houses. The vacant houses are dilapidated; each will cost hundreds of thousands of dollars to restore. In other words, these houses are teardowns but for the primacy of "historic preservation" in our town. We recognize that South Pasadena is home to beautiful architecture. But valuing historic preservation above all else is backward in the midst of a severe housing crisis.

[4] Given that the City has included a number of non-vacant sites in its sites inventory, it follows that the City should add the tenant-occupied Caltrans houses to its sites inventory as well as potential sites for affordable housing development.

[5] The Housing Element claims that South Pasadena is built out, and that "[i]t is too early to tell how many single-family property owners with parcels that are not within historic districts will opt to build two units or subdivide their lots to build more, but the City will review and approve applications under the new regulations in compliance with both State and local

- Develop auxiliary dwelling units as affordable rental units at as many of the houses as possible.

We ask the City to explore denser development with the larger houses, such as:

- 535 Meridian St. (21,920 sq. ft., ~ 0.5 acres),
- 530 Orange Grove Ave. (7500 sq. ft.) and 534 Orange Grove Ave. (10,010 sq. ft.) (adjacent parcels that represent 17,510 sq. ft., ~0.40 acres),
- 1131 Columbia St. (16,998 sq. ft., ~ 0.39 acres),
- 529 Prospect Ave. (15,419 sq. ft., ~0.35 acres),
- 540 Prospect Ave. (11,505 sq. ft., ~0.26 acres),
- 217 Fremont St. (13,310 sq. ft., ~0.31 acres)
- 216 Fairview Ave. (13,240 sq. ft., ~0.30 acres),
- 1110 Glendon Way (11,250 sq. ft,. ~0.26 acres).

Compare these lot sizes to the lot sizes in Table VI-49 (at 182), Representative Projects on Small Sites in Region. In Pasadena and Santa Monica, developments on comparable lots accommodate 15-53 units. Conservatively assuming 20 units per parcel on the large lots listed above, **the City could add 160 affordable rental units on these parcels alone.**

The Fourth Draft Housing Element slates virtually all of the housing affordable to very low- and low-income people in areas zoned as Business Park, Commercial, Community Facilities, Mission Street zoning areas save for one site in the Estate and Very Low Density Residential area (335 Monterey Rd.). (Table VI-50).

The Housing Element's allocation of all low-income housing to transit corridors, outside of residential single-family neighborhoods, does not comply with principles of fair housing. Concentrating dense low-income housing in certain limited areas is antithetical to affirmatively furthering fair housing. It undermines meaningful housing integration in this exclusionary town. The City should rezone single-family areas within the City, including along the 710 freeway corridor, to allow for more affordable housing. The vacant Caltrans houses could provide housing to low-income people within single-family home residential areas, and further the City's goal of creating income-diverse neighborhoods.

SB 381 allows the City to sell seven (7) houses designated as historic "as-is" at market rate to private buyers, so long as it uses the funds to develop affordable housing at a 3:1 ratio. The City **should not** opt for this route. There is no scarcity of large estate houses in South Pasadena. There is an acute shortage of affordable housing. The City should develop multi-unit housing on the historic and non-historic Caltrans parcels alike.

If the City does sell the historic houses, the **Housing Element should reflect its plans to commence construction of affordable units *within three years*, as required by statute**. As evidenced in this draft of the Housing Element, the City is short on available sites for affordable housing development and has identified no potential affordable housing projects that will start or be completed within this short time frame. The Housing Element should identify where those units will go, how they will be financed, what type of housing it will build, etc.

No matter what, the City should not aim to "preserve and rehabilitate" these homes by pursuing historic designation of new properties. These were strategies used once to prevent the building of the 710

codes." (143). But South Pasadena is in the driver's seat regarding these 20 properties. It must start leading on implementing the state laws rather than passively wait to see what homeowners do.

freeway, which is no longer at issue. Historic designation, starting with the commencement of nomination to historic and endangered listings, is antithetical to affirmatively furthering fair housing in South Pasadena. Historic designation of homes would make them unaffordable and environmentally unsustainable to maintain, cementing the city's 20th century redlining policies into the future.

South Pasadena must complete another draft Housing Element that fully accounts for the vacant Caltrans houses it will buy in the near future, with concrete proposals about how to use these parcels to expand affordable housing. Since the City intends to purchase the vacant homes in the coming months, thus making these City owned properties, we expect to see these parcels listed on the Inventory Site list in the next draft.

100% Affordable Developments. Care First urges the city to actively recruit 100% affordable developments through non-profit low-income housing developers (i.e. bolster its commitment to Program 2.h).[6] We recognize that the City has identified two City-owned sites (9 and 14) as candidates for 100% affordable. (229 & Table VI-50). We propose that the City Council double down on its efforts to identify two more viable locations for a total of four (4) for 100% affordable developments, excluding the Caltrans properties discussed above (which are all slated for affordable housing anyway by statute). Additional sites should be for very low, low and moderate income households combined and provide housing opportunities for families.

Auxiliary Dwelling Units. The Housing Element relies heavily on ADUs to create affordable housing and to further fair housing. But the evidence is thin that encouraging ADUs will be anywhere close to sufficient.

South Pasadena has no system in place to ensure that the ADUs it permits actually become rental units, much less affordable ones. The code states that ADUs are not to be rented for a period less than 30 days, but the City currently has no enforcement mechanism in place to monitor the use of ADUs.[7] It is just as likely that ADUs will become short term rentals listed on apps like airbnb, home offices, and guest houses for visitors. The existing ordinance does not go far enough to ensure homeowners who take advantage of a program designed to increase housing opportunities for those who need housing are using the dwelling as intended by the spirit of State law

Even when ADUs are rented, the data emerging so far suggests that these units are not affordable. (176). Finally, the whole endeavor relies on homeowners investing large sums of money to build these ADUs. Rising inflation may dampen ADU construction.

We recommend that the City pilot an affordable ADU program, like Backyard Homes in Los Angeles. Affordable ADU programs offer free or heavily discounted ADUs to homeowners in exchange for covenants to charge below-market rental rates. The Backyard Homes project, run through LA Mas, offers a few model ADU options and charge discounted construction and design fees in exchange for

[6] The city's previous position was that it would simply work within the San Gabriel Valley Housing Trust to build affordable housing in the region. Care First is encouraged to see that the third draft of the housing element takes a more proactive approach.

[7] It is common for short term rental operators in our city to rent their units for two months at a time. While that complies with the letter of the code, the owners are benefiting financially via an unlicensed commercial short term rental at market rates.

renting to a Section 8 voucher holder.[8] Piloting an innovative model like that could spur ADU construction and support affordable housing and income-diverse neighborhoods.

II. Protections for renters

South Pasadena residents are more than 50% renters. Renters account for most of the demographic and economic diversity in South Pasadena. More than two-thirds of renter-households are rent-burdened, with 64% spending more than 30% of their household income for housing.

The Housing Element sets conservation of existing housing stock as a prominent goal, and contains some general provisions aimed at protecting renters. (220). But monitoring affordable units, offering technical assistance to landlords, and vague commitments to vouchers will not be enough to prevent dislocation and erosion of existing below-market rental units. (220-221). **The City cannot accomplish a goal of preventing tenant displacement without enacting more tenant protections**. Currently, South Pasadena relies almost entirely on Statewide protections set in AB1482. These have proven not to go far enough in protecting tenants from evictions or self evictions due to unbearable rent increases due to current inflation.

The landlords and homeowners have "rent control." When they buy the apartments, the mortgage payment they pay is set for 30 years. It does not change even if inflation happens. Renters are demanding, not even the same stability, just something where their rent remains close to inflation, and the right to stay in their home if they pay their rent.

Landlords are making massive profits on rent. Most "mom and pop" landlords in South Pasadena purchased their apartments 20 to 30 years ago. Over the past year, 13 apartment buildings have sold in South Pasadena at an average of $1.6 million. Meanwhile, the average original purchase price of these 13 apartments was $256,000. Most "mom and pop" landlords are realizing massive profits off people struggling to stay in South Pasadena.

Renters love South Pasadena and want to make it their home just like homeowners. Tenants have a right to be a part of this long-term community and not have to worry if the housing crisis means someone richer will take their place.

No cause eviction protections. South Pasadena Tenants Union and Care First South Pasadena request an urgency ordinance to stem the tide of no-cause evictions expected in early 2023. Building on the progress advocates made with its just cause eviction ordinance in 2019 and its substantial renovations ordinance in 2021, we ask that the City update the law to require landlords effectuating no-cause evictions to provide relocation assistance that goes beyond AB1482.

The relocation amount should be equal to two (2) times the daily pro-rata portion of the tenant's current rent. All units removed for owner occupancy must be held off the market for no less than three years. If an owner evicts a tenant for no-cause because that unit will be taken off the market for owner occupancy, the owner must register the unit with the City as "owner occupied." If the owner violates the ordinance and puts the unit back on the market within the three year period, a $50,000 fine will be levied. Funds collected from fines would support Housing department staff and enforcement staff.

[8] Sam Lubell, Los Angeles Times, March 5, 2021, "Well-designed rentals that L.A. can afford. That's the mission of the Backyard Homes Project." https://www.latimes.com/entertainment-arts/story/2021-03-05/backyard-homes-project-adu-los-angeles

For evictions due to justified substantial renovations, the ordinance should include a first right of return for tenants who do not want to relocate out of South Pasadena. The owner should cover the rent or cost of housing during renovation up to what the tenant was paying for rent at the unit undergoing renovation. The tenant should be allowed to return to the unit at the same rate as was being charged prior to renovation. If temporary relocation due to verified substantial renovation exceeds 120 days, the landlord may terminate the tenancy with the additional payment of relocation assistance as follows: (1) 2.5 times the monthly Fair Market Rent (published by HUD) plus (2) a Moving Expense Allowance of $1,338 (if all occupants are adults) or $4033 (if any of the occupants are minors, a senior, or a person with a disability.

These protections would provide much more support to South Pasadena renters than the municipal code currently provides, and prevent displacement.

Rental assistance. The City currently allocates its CDBG funding to meals on wheels for seniors and sidewalk repairs. We demand that the City initiate a rental assistance program with some of the CDBG funding plus allocate yearly amounts from its General Fund to provide low- and moderate-income residents and prospective tenants to pay security deposits and rent. The program should also offer rental assistance to moderate-income rent-burdened residents. Additionally, the City should pay partial rent for Section 8 voucher holders to make up the difference between rent and the voucher. Because many Section 8 voucher holders in Los Angeles County are unable to secure housing in time and lose their vouchers as a result, the City should help ameliorate this problem by incentivizing and assisting landlords within the City to join the Section 8 program. At present, there is an abysmally low number of Section 8 voucher holders residing in the city (10 total according to the Housing Element). Referring residents to the County (224-25) will not help anyone get into affordable housing when there are no voucher-accepting units in South Pasadena.

Rent control. The City should adopt a rent stabilization ordinance. A local rent control ordinance would give low income and moderate income families, seniors, the disabled and students and workers a fighting chance to stay in South Pasadena. The bleeding out of affordable existing rentals is gradually affecting the diversity of our schools, local culture and economics. South Pasadena being almost an exclusively high rent community, means more transient households that are less likely to support our community health through civic participation and investment in our churches, nonprofits, and schools. With a lack of enthusiasm for building new affordable housing, the City needs do more to maintain the little existing affordable housing we have and protect all tenants from further displacement because of ever increasing rents and cost of living that does not mirror increases in incomes.

This would include, but not be limited to, provisions such as limiting rent increases to no more than 2-6% based on inflation, with the ceiling set at 6%. The ordinance would maintain a floor of 2% allowable regardless of percentage of inflation. If inflation is 1%, rent can be raised 2% The ordinance would apply to all buildings as allowed under Costa Hawkins. If Costa Hawkins is repealed or modified to allow newer buildings, then rent control in South Pasadena automatically applies 20 years after certificate of occupancy.

The ordinance would require a lease term of one year (12 months), and 60-day notices for rent increases. If a unit become available due to an eviction, rent on the unit can only be raised up to 20% of what the landlord was charging the previous tenant. The ordinance should also include the establishment of a local rent control board to establish yearly rent increases, monitor enforcement, and adjudicate tenant and landlord disputes, among other duties

Funding improvements in exchange for affordability covenants. Policies 1.1-1.3 in the Housing Element are focused on improving energy efficiency and bringing older housing units up to code (218). There is a real risk, however, that requiring owners to make financial investments to update older units will result in rent increases, evictions for substantial renovation, and dislocation of low- and moderate income renters in South Pasadena.

We ask that the City provide funding to make needed improvements to make housing units habitable and safe for tenants contingent upon the landlords' covenants not to evict tenants or raise rents excessively once the units are improved. The City has already identified potential funding sources for such improvements. (220).

Thank you for the opportunity to provide feedback. We look forward to participating in the process as it proceeds.

Best regards,

South Pasadena Tenants Union & Care First South Pasadena

- **How addressed:** The City has not made any determinations regarding the eventual dispensation of the Caltrans homes. Currently, the City is doing its due diligence regarding the condition of the homes and the possible financing mechanisms for rehabilitation of the properties. This analysis includes researching possibilities regarding increasing the number of units on Caltrans home sites, where feasible. However, since the due diligence work is ongoing, it is not possible for the City to commit to any course of action regarding these homes at this time. It is the intention of the City to preserve these homes as affordable housing, not as historic resources. The Housing Element has been updated to more clearly make this point.

The Housing Element focuses on encouraging the development of new housing throughout South Pasadena. It is anticipated that sufficient new housing will improve the housing market for both renters and buyers looking to live in South Pasadena.

As shown in Program 2.l, the City has committed to issuing an RFP to affordable housing developers for one of the city-owned affordable housing sites no later than December 2024, and other RFPs in 2026 for the development of housing on these city-owned site.

Program 3.g commits the city to monitor the number of ADUs built, and to survey ADU owners annually to collect data on rental rates to determine how many moderate- and lower-income units have been produced. Program 3.h commits the city to modify its zoning code or identify additional affordable housing sites if it is determined that the affordability of ADUs is less than expected in the Housing Element. This survey is scheduled to begin in 2023.

Comments on the 4th Draft Housing Element

Mark Gallatin (December 5, 2022)

I would respectfully like to suggest the following alternate language for that found on page 216 of the September 2022 Draft Housing Element:

Program 1.b. - Convert Caltrans Homes to Affordable Housing

The City will leverage the 68 Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital to create new and rehabilitated, deed restricted, affordable housing units throughout the city. The City has initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase the surplus properties after the existing tenants. The City has been working with Caltrans to obtain property files and to schedule inspections in order to evaluate the surplus properties. SB 381 also requires that any proceeds from historic properties purchased by the City at Caltrans minimum (acquisition) price and then subsequently sold at Fair Market Value be used to generate affordable housing at a ratio of 3 to 1. Funding has been secured for a feasibility study on the surplus properties that are available to be converted to permanent affordable housing.

Eight-year Objective: Complete a feasibility study and use the recommendations to support decision-making regarding possible strategies, including but not limited to, partnerships with non-profit affordable housing developers, to expand housing mobility opportunities for lower-income households and revitalize underused areas.

Funding Source: Measure H

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Conduct feasibility study in 2022; technical assistance and work with nonprofits at least annually throughout planning period. More specific timing pending State implementation processes.

- **How addressed:** Program 1.b has been revised to substantially match the proposed language in this comment.

Josh Albrektson (December 19, 2022)

South Pasadena comments:

Downtown Rezoning

They are going to 70 DU/ACre and 60 ft/6 stories which is good. Of note, most buildings need 7 stories to get 70 DU/Acre.

They have a TON of bullshit sites that would never be developed. When Los Angeles did their analysis they got rid of these sites. It is one thing to claim 20% of developable sites will be developed at 100% capacity. It is quite another to claim 100% of a complete downtown would be developed when 30% of the downtown has zero chance of actual redevelopment.

I will be doing a twitter thread on it and there will be EXTENSIVE complaints if these bullshit sites are allowed to be counted. These include multiple official South Pasadena historical monuments, multiple condo complexes that are 15 years old, Historic theaters, Micheal Myers House from halloween, single family homes on 4,000 sq ft lots, 100 year restaurants, 10 foot alleys, historic banks, etc, etc.

Every condo complex built in the last 22 years, every historical monument, all buildings over 70 years old, and all single family homes under 0.2 acres should be removed from the calculations and only the

buildings that ACTUALLY has a chance of development should be counted as 20% likely to be developed.

Inclusionary Housing Ordinance

Their own study shows that 15% is not viable in South Pasadena. They also believe that they can make the 15% Very Low or 7.5% Very low and 7.5% Low.

I have attached an e-mail from the Mission Bell owner to the planning director on Sept 29th stating that his fully market rate project is not currently financially viable. If their fully market rate project is not viable then a 15% IHO is not viable.

South Pasadena should be required to change their IHO to 10% Low OR 5% Very Low and if housing is actually built using the IHO, then they can increase it if they find housing is actually being built, rather than go the other way around.

Especially since they intentionally killed all projects with their 10% Low and 10% Very low which is currently still in place.

Realistic Development Capacity

They are claiming that almost every non-vacant low income site will be built out at 95% Capacity, even though every one is on a primarily commercial street. You rejected Santa Monicas draft for this reason and you have cited multiple cities for this.

Here is Danville:

https://twitter.com/JalbyMD/status/1602454496822497282?s=20&t=qjjmEng2_VMCWagab4n-dw

[twitter.com]In May 2021, before Chris Holden called your director, you had a problem with South Pasadena claiming 80% RDC.

It is completely unacceptable that you guys are allowing South Pasadena to claim a ridiculously high number.

Processing Timelines

South Pasadena has had 4 mid level projects proposed from 2018 on. As of yet, none of them have building permits. It is absolutely unacceptable that you guys say that they can be by right at 20% affordability in order to avoid these processing times.

Santa Monica committed to making all projects that fit the zoning under one acre by right. And they have actually historically produced housing. South Pasadena has not.

I even sent you information about how they required a preliminary application a year before a real application and how they forced 815 fremont to undergo TWO complete redesigns.

In the Housing Element you have a letter from Victor Tran about how he submitted applications in March of this year that South Pasadena hasn't even acknowledged they have been turned in.

South Pasadena was one of two cities to receive a grant from SCAG to pay for objective design standards for all it's multifamily housing. They need to be required that all projects with 10% low be by right.

Something needs to be explicitly written out in the Housing Element with actionable measures to ensure projects are processed. They also need to commit to following the law on the permit streamlining act which they currently regularly violate.

Low Income Sites

You will receive separate more in depth individual e-mails where Gustavo and Megan are CCed with these low income sites and the exact part of the law that are being ignored if these sites are approved. I want to be sure that they will not be able to claim they didn't know that the laws are intentionally being ignored when this comes up in the future.

I did a twitter thread, which I will also submit as a different comment:

https://twitter.com/JalbyMD/status/1602435712846290944?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 2

Just to be clear, two of the biggest buildings JUST GOT LEASED:

https://twitter.com/JalbyMD/status/1602449467042430976?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]And I just want to say it is fucking bullshit that Paul thinks I have to prove they are not short term leases. South Pasadena gets to lie about what is leased and that is okay, but when I show that buildings that make the site undevelopable are lease, I am required to get teh leases to show they are not short term leases…..

This is a copy of the exact part of AB 1397 talking about leases that you are choosing to ignore the actual legislation passed by the legislator and signed by the governor and not to apply to this site.

https://twitter.com/JalbyMD/status/1602450748377370624?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 8

There is no replacement site, if they had a replacement site they would have pay millions for the site, they would have to pay millions to build a new public works yard, then they would have to pay to tear down the building and remove the gas tanks, and then after the multi-millions spent, only then could it be offered for an affordable housing project.

Before Chris Holden called your director you actually cared about this site. When I posted it on twitter a developer told me he estimated it would cost "Tens of Millions" just to replace the site and make it available for house.

https://twitter.com/JalbyMD/status/1602444291711844353?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]Site 12:

The City doesn't own most of the site. They own 0.19 and do not have plans to buy he rest. Also see Site 15 comment for sites under 0.5 Acre.

Site 13:

The City has a lease going through 2024 for this site. They actually turned down someone who wanted to build affordable housing on this site. They added a single family home that they do not own to get over 0.5 acre.

Site 14:

You ignored almost all the actual laws passed by considering this site.

Link to video:

https://twitter.com/JalbyMD/status/1602446669571727360?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]Just to be clear, both homes are getting brand new foundations. They have hired an architect to renovate the homes (Harvest Architecture). This site is under 0.5 Acres. I sent you an e-mail from the owner stating his plans were to renovated the home s(which is actually happening right now.)

This is a link to the part of AB 1397 which was passed by the legislature and signed by the governor that you are choosing to ignore by saying South Pasadena has substantial evidence the current use will be discontinued in the planning period.

https://twitter.com/JalbyMD/status/1602438163506794498?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA [twitter.com]

This is a link to the part of AB 1397 which was passed by the legislature and signed by the governor that you are choosing to ignore by allowing a under 0.5 Acre site to be considered a low income housing site:

https://twitter.com/JalbyMD/status/1602447693690720256?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]

Site 16:

Newly renovated grocery store with grand Re-Opening August 3rd. You can read my tweets on it here:

https://twitter.com/JalbyMD/status/1602439866897211393?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]They first claimed it was the whole grocery store, then it was just the parking lot, then you guys told them how to lie to you so that the parking lot would be acceptable. Here is a link to the mayor spitballing ideas of how they could lie to you about the parking lot:

https://twitter.com/JalbyMD/status/1602443223150256129?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA

[twitter.com]They got a letter from the owner in the Housing Element which I am sure they wrote what SoPas asked them to write.

Site 17:

I recently received all e-mails from South Pasadena and the site owner. In the e-mails the owner is asked if they are considering housing on the site and he says "I think we are good." When asked if they want to still be on the Housing Element site list, he replies "I guess"

Along with the brand new lease signed this year this is pretty damn good evidence that the owner has no interest in developing housing in the planning period.

Please refer to the above link to the law talking about how leases should be considered.

Programs:

South Pasadena needs specific objective circuit breakers in their Housing Element programs. As mentioned in the call, you can pay a consultant to produce a study proving the highest inclusionary housing ordinance in the state is viable even when it is blatantly not, and that is exactly what South Pasadena did. They cannot be trusted to evaluate their sites in 2024, update the inclusionary housing ordinance, look into reducing parking and open space requirements, or do a realistic rezone if the ballot measure fails. These things need to be spelled out in this housing element so they are enforceable.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been substantially revised to address these comments, including increasing the height limit, removing identified sites, and revising the analysis of the DTSP sites to account for additional constraints such as historic designations.

Josh Albrektson (January 2, 2023)

This e-mail is about a South Pasadena low income site on their housing element, and the exact laws that Paul McDougall and Megan Kirkeby are ignoring in allowing South Pasadena to claim this site as

a possible low income site on their Housing Element. I am sending this to you so you cannot claim you did not know this was happening at HCD in the future.

Site 14 is two single family homes. Paul McDougall has an e-mail that the owner sent to the city in 2020 stating he was planning on flipping the homes and selling them.

That renovation is happening right now and Paul McDougall KNOWS that the homes are being renovated. They are currently getting brand new foundations by Foundation Repair LA (https://foundationrepairla.com/ [foundationrepairla.com]). These are the same people who repaired my foundation.

They also have an architect, Harvest Architecture based in South Pasadena that are designing the interiors. https://www.harvestarchitecture.com/

[harvestarchitecture.com]Here is a video where you can see the signs for both of these companies and one of the single family homes getting the foundation as it is being filmed.

https://twitter.com/JalbyMD/status/1602446669571727360?s=20&t=w-Zi8cbwbgVUhWvxqQIHvA [twitter.com]

Here is the part of AB 1397 that Paul McDougall is choosing to not enforce:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

These single family homes are literally being renovated to be BETTER single family homes and Paul McDougall knows this and doesn't care.

But not only that, these sites are below 0.5 Acre. THIS IS SPECIFICALLY OUTLAWED BY AB 1397.

Again, citing the law passed by the legislators and sign by the governor:

(A) A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.

Sites 12 (0.19 acre owned by city) and Site 13 (0.42 owned by the city) Both fall under this category.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** Site 14 has been removed from the Housing Element. Site 12 is 0.56 acres.

Josh Albrektson (January 2, 2023)

This is one of a few e-mails you will be getting where I am going to cite a "low income site" that South Pasadena is claiming could be turned into low income housing this cycle and the exact law that specifically outlaws these sites.

Every one of these sites Paul McDougall said was okay in our November 15th meeting.

I just want to be sure that Jason and Gustavo cannot say in the future that they did not know that Paul McDougal and Megan Kirkeby are intentionally not following the laws passed by the legislator and signed by the governor.

I will be sharing these e-mails with every legislator if South Pasadena is allowed to claim these sites, along with the hundred other examples of illegal low income sites that I personally e-mail Paul McDougall about and he approved.

I get that Chris Holden had a personal and urgent phone call with Gustavo to discuss the South Pasadena Housing Element, but that does not mean that HCD should decide not to enforce the laws that are the actual laws.

Site two is a businesspark in South Pasadena. They literally just leases two new businesses this year and these two businesses occupy the entire buildings for two of the 6 buildings.

Check out the leasing brochure. This is high quality offices:

https://images1.loopnet.com/d2/NjuUcEIzCBdbskuj3g5Mj_3zqct3H2jyorx1Mu5ckGw/149161PasadenaSouthPasadenaBrochure.pdf [images1.loopnet.com]



This is from the summary of AB 1397:

This bill would require the methodology to consider, among other things, the city's or county's past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment, as specified.

And here is the actual text from the law:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

Paul McDougall knows these buildings were JUST leased, and he doesn't care. When I told him again that they were leased this year, he asked me to prove they were not month to month leases.

The job of HCD is to enforce Housing Laws, and Paul McDougall should not be allowed to just ignore the laws at his will, and that is currently what is happening under Gustavo's leadership.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the allowable density for Site 2 to further encourage the redevelopment of the site. Furthermore, development standards for this site, as well as all mixed-use parcels, will be revised to encourage redevelopment.

Josh Albrektson (January 2, 2023)

This e-mail is about a South Pasadena low income site on their housing element, and the exact laws that Paul McDougall and Megan Kirkeby are ignoring in allowing South Pasadena to claim this site as a possible low income site on their Housing Element. I am sending this to you so you cannot claim you did not know this was happening at HCD in the future. Site 8 is the Public Works yard for South Pasadena. You can see a video of the yard in this tweet:

https://twitter.com/JalbyMD/status/1602444291711844353?s=20&t=U_d2X2e5GgNUrylao7D03w

[twitter.com]Let me be clear about what South Pasadena is claiming for this site. Sometime in the next 7 years, they will find a replacement site. They do not have any open land right now for this replacement site, but they will find one somewhere. They will then build a brand new public works yard on this replacement site. They will then tear down the old public works yard. They will then remove the gas tank that has been there for decades. They will then remediate any toxins in the soil from this being a public works yard for 40 years.

We are talking about tens of millions of dollars spent before this site could even be considered for low income housing. This site is the kind of bullshit sites that will NEVER be housing but cities like to claim it so they don't have to zone for housing somewhere else.

In the last letter from Paul McDougall, HCD actually explains how the city should lie to HCD in a manner they would be willing to accept.

"For Site 8 (Public Works Yard), the element should discuss the impacts of the underground gasoline tank and filing station and soil contamination on the timing and cost of development in the planning period."

Here is the part of AB 1397 that Paul McDougall is choosing to not enforce:

(g) (1) For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis

of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to further describe where the existing uses of Site 8 will be relocated and to address the potential environmental constraints on the site.

Josh Albrektson (January 9, 2023)

I have come across this information from a respected individual. They believe that the density that can be built at 45 feet is about 40 to 44 DU/Acre. The is under 1 DU/Acre per ft of height.

If a City such as South Pasadena wants to claim 70 DU/Acre, they need to have a height limit of at least 75 ft.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the height limit of the mixed-use zones.

Josh Albrektson (January 12, 2023)

Please consider this thread on the downtown rezoning and the extensive number of buildings that could NEVER be developed included in their calculations.

https://twitter.com/JalbyMD/status/1613662763473342465?s=20&t=YWu-t552VhhJiPuR8JBnXA [twitter.com]

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The analysis of the DTSP area has been extensively revised to address this comment. Revisions include removal of many of the identified parcels from the analysis, and additional considerations regarding the probability of redevelopment of parcels within the DTSP area.

Josh Albrektson (January 31, 2023)

Please consider the following separate comments:

1. Glendon and Meridian from Monterey to the 110 freeway should be included in the Downtown Specific plan and significantly upzoned, especially since they are touching the train station.

2. Monterey Road from Pasadena Ave Southwest should be significantly upzoned. This abuts a mountain, and has very close access to parks and an elementary school and has a lot of run down single family homes that can be upzoned.

3. I like the idea of SB 10 around Fair Oaks and Huntington

4. Consider upzoning Fremont Ave from Monterey to the 110 freeway.

You are actually further away from compliance than you think. HCD has not certified a Housing Element that doesn't have a significant buffer (They recommend 15%) and I doubt you will be the first.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the zoning capacity in all of the areas identified in this comment.

Josh Albrektson (February 1, 2023)

I just read through the staff report for tonight's meeting. After reading through it, I expect that your next draft will also be rejected.

There are two major issues.

In the 4th draft for low income units you were required to have 1155 and you showed 1178 for 23 total excess. That is a 2% buffer. Some of the sites you have will not be allowed, so once you remove those sites you will actually be under the required amount.

To date HCD has not allowed a Housing Element to be accepted without a significant buffer. Most accepted Housing Elements have a minimum buffer of 10% or greater. In their memo on the bottom of page 22 they state you should have a 15 to 30% buffer.

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf

I sent a separate e-mail noting the 4 places I would upzone. If you guys do choose to try to submit another Housing Element without a buffer it will be the first issue I raise with them.

The second problem is that you actually need to create programs to affirmatively further fair housing (part 3 in the letter). South Pasadena has yet to actually propose an AFFH program and what is described in the staff report definitely would not be good enough.

San Marino and Santa Monica both legalized 2 to 4 plexes for their AFFH program. If you guys don't want to do that, you can probably get by implementing rent control and stating that allows people to stay in their homes.

And I hope after having been told many many many times that they need to put firm data and specific information in the Housing Element, your staff will realize they need to:

1. Spell out exactly what development standards will be relaxed in what manner

2. Specify what fee reductions and streamlining will be implemented

3. The exact IHO percentage

4. The number of units the IHO applies to

5. The hard trigger that would show if the IHO is effective or not with the change that will be made if the trigger is not met

6. If the city will remove the height limit completely or change the height limit to 84 ft and 7 stories

One thing to note about the height limit. As it stands SB 828 will give South Pasadena another 2,067 units in 2030. If you do a limited height restriction removal, you will have significant problems at that time. And I doubt HCD would give you 2 years to put it on the ballot since you will end up with plenty of warning in the years leading up to it.

Also note that because you are including a lot of historic properties in your Housing Element (Specifically downtown), and your ability to stop a development on these properties is going to be very limited. Anybody who wants to buy the Fair Oaks pharmacy or Rialto Theater and tear it down for apartments can.

I strongly suggest you guys consider what buildings you want off limits, remove them, and upzone a different part of the city you do not care as much about. This could probably even be done after you have a compliant Housing Element.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the zoning capacity to account for a 15% buffer for lower income units and more than a 30% buffer across all income categories.

Josh Albrektson (February 6, 2023)

I cannot make the meeting do that previous commitments. I want to put this comment in the public record. I support all of the zoning changes and programs mentioned on the February 1 city Council meeting by city Council and staff with one exception. I think great progress is being made.

I do believe the historic downtown properties should be completely removed from the zoning so that they cannot be re-developed. I will have a much more extensive letter in support of the housing element once I get back.

It would be great if this meeting was recorded and published.

Also, the staff does not need to respond to my comments on the previous draft due to the fact, I think there will be significant changes on the draft. Please refer to this paragraph and not waste any time responding to previous comments.

- **How addressed:** The zoning changes and programs mentioned during the February 1st City Council meeting have largely been implemented in the Housing Element, as refined during the City Council meetings held on February 9th and 15th.

Josh Albrektson (February 6, 2023)

Just to be specific.

Please withdraw all comments from me that were received after the last housing element was published. If they need to be included in the record please do not feel to respond and refer to this comment saying SoPas does not need to respond.

- **How addressed:** The previous comments are included in this Appendix with brief responses.

Josh Albrektson (February 13, 2023)

I got back from my cruise and listened to the Thursday meeting. I think you guys are doing a great job and I'll do whatever I can to help you get compliance with the zoning.

So this is what I have for my letter that would give you substantial evidence. Once you guys finish your plans, I will add onto it.

https://docs.google.com/document/d/1WJf1YEmjngsUVDaCq3lcy9SIMGx-E3q80K6tCtWeBPU/edit?usp=sharing

I fully believe that with either citywide 4 plexes with right of return OR Transit 4 Plexes with right of return and rent control, you will pass AFFH. I have talked to Anne and you heard from John. If you guys include a program for rent control, you will have a strong letter from the SPTU asking HCD to find you in compliance.

With my letter and SPTU's, I think you should get compliance.

--

Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to allow for four-plexes citywide, expect in high fire hazard areas, and to include a right to return policy (Program 6.b.).

Josh Albrektson (February 13, 2023)

So I talked to Matt Gelfand (CCed on email) and told him about my idea for a grocery overlay zone.

It would be to give Ralphs and Vons the same zoning that Pavilions requested, but since they are much less likely than Pavilions to develop in the planning period, only counting 25% realistic development capacity of the maximal density.

So for Vons it would be 3.96 Acre x 140 DU/Acre x 0.25 chance of development for 139 units

Ralphs would be 3.09 acre x 140 DU/acre x 0.25 chance of development for 108 units.

Matt is okay with removing those sites from the banned sites for this kind of zoning and calculation. It is part of your agreement, not stipulation, so it would just require you guys signing a piece of paper.

I also don't think HCD would have a problem with it since the calculation is just like what they have on the top of Page 22 and I will be including it in my letter providing you with substantial compliance.

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sites_inventory_memo_final06102020.pdf

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Josh Albrektson MD

Neuroradiologist by night

Crime fighter by day

- **How addressed:** The Housing Element has been revised to increase the allowable density for these parcels, along with all of the parcels adjacent to Fair Oaks Ave., to 110 du/ac.

Alan Ehrlich (February 14, 2023)

Hi Angelica, Armine,

Like you and many others, I would like to see the city submit a HE that can be accepted by HCD with this next go. My general sense from the questions and comments of the special council meeting last week is that members of the council finally seem to 'get it" and are (mostly) ready to accept the additional changes which will be necessary in So Pas's 5th draft submittal.

With that it mind, and in spite of pushback I expect you would receive from certain members of the community, please accept these suggestions for inclusion in this next draft. Like you, I believe we would all like to see this phase of the HE to be done so we can get on to the next part of our lives.

1) Remove the 45 year CHC review from the planning code. According to Mark Gallatin, state law permits the same review and in the 6 instances where a property was reviewed during Mark's term on CHC, all have been approved. This is a gimme.' Effectively, the city is giving up nothing, but to HCD it will appear the city is removing a constraint. CHC will squawk, but by Mark"s own statements, there is no there there.

2) Mark Gallatin corrected a public comment I made about SB 381 requiring 3 housing units for each CT property sold. Mark clarified that this only applies to the 7 historic properties of the 67 lots within our city. In my comment I had said that if the city committed to 3 AFFH for all properties, that would provide a minimum of 60 units, giving the HE the cushion needed for this section. HCD is obviously very aware of the CalTrans properties and the potential they represent to meeting the city's AFFH and RHNA targets. Instead of continuing to battle HCD on this point, allow me to suggest that the 5th draft commits to adding a minimum 3 AFFH for every CT property, regardless of whether the city redevelops the site, partners with an HRE, or sells the site to a private buyer. If the requirement exists for the 7 historic properties, it is not a stretch to apply the same condition to the 20 non-historic properties as well. It does not prevent the city from acquiring and selling the 20 properties, it just provides HCD an assurance that the sale of public land will be used for public housing purposes. Standardizing the rule, respectfully, this is also a gimme, a no-brainer.

3) As a practical matter for the elected members of the city council (and feel free to share this with them), this is perhaps the optimal time to go for broke and submit the plan that HCD will approve. 2022 elections are over, so anything submitted/approved now would not affect Michael or Janet in

2026 and we are stilll far enough from the 2024 elections for it to concern Jon, Evelyn or Jack. On the other hand, if the city continues to fight HCD by submitting bad HEs, there will no doubt be several builder remedy projects filed before 20024 and the voters will remember that when they had the chance, Jon, Evelyn and Jack did nothing and will be held to blame.

4) One final recommendaion, please add a slide to the presentation showing the number, names and $$$ of grants available to provide, restore and rehabilitate AFFH. HCD, SCANPH and SCAG send NOFA's out regularly announcing new programs, many of which I have forwarded to you Given the estimated costs of what it will take to rehabilitate the CT homes, it is only appropriate that the council and members of the community know how many hundreds of millions of dollars the city is leaving on the table by not having an approved HE and not being eligible to apply. It would be the understatement of the year to say the city has neither the funds, staffing or expertise to manage any of the CT properties.

As I've suggested to both of you before, I don't know what the perfect plan is, or even if one exists, but I do know, and you know, that there are a variety of options out there that could work. Its time to get off the crazy train. If the city needs to be engaged with lawsuits over the HE, I'd rather it against the neanderthals holding the city back than CA Homeowners and Chris Suttons of the world. Let the Urquharts, Shanes, Takedas, Carlsons, Gallatins, Nuckols and thier ilk put their money at risk fighting state mandates, rather than making the rest of the city's taxpayers assume the cost of their NIMBYism.

I'm looking forward to seeing you both at tomorrows council meetings. I do not have Grant's email address, otherwise I would have included him as well.

best, Alan

"Sunlight is said to be the best of disinfectants."

- Supreme Court Justice Louis Brandeis

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"Openness in government is essential to the functioning of a democracy."

International Federation of Professional & Technical Engineers, Local 21 v. Superior Court

California Supreme Court, 42 Cal.4th 319 (2007)

- **How addressed:** The Housing Element has been revised to further address the Caltrans homes and to greatly increase the zoning capacity throughout the city.

Care First (February 15, 2023)

Re: **Special Joint Meeting of the City Council and Planning Commission, February 15, 2023**

Comment, Agenda Item No. 2, Receive Housing Element Presentation and Provide Direction on 5th Draft

Dear Mayor, City Councilmembers, Planning Commissioners:

Care First South Pasadena is pleased to submit the following comments on the fifth draft of the City of South Pasadena's Housing Element. At this critical juncture where the city stands to lose local control over the development of the city, we strongly recommend the city to adopt the following policies to affirmatively further fair housing, encourage the development of more affordable housing in an equitable manner, and preserve existing affordable housing.

Care First continues to demand:

- A commitment to use the 20 vacant Caltrans house sites, which the City will purchase in the coming months, to develop on site a blend of duplexes, triplexes, quads, and denser multi-unit buildings for affordable ownership and rental opportunities (A number of the vacant houses are 0.25-0.50 acres and could accommodate redevelopment with even more housing units.);
- A pilot affordable ADU program, like the Backyard Homes project in Northeast Los Angeles (https://www.mas.la/affordable-adus); and
- Recruitment of 100% affordable developments through non-profit low-income housing, developers for at least four (4) clearly identified and viable locations for 100% affordable developments, plus spelling out specific financial and regulatory incentives the city could offer such developers.

The City should also adopt the following policies as ordinances with accompanying budget allocations as needed to implement the programs, within six (6) months from the date the Housing Element is adopted:

- Rent stabilization with an 8 percent annual cap for all apartment complexes that have ten or more units;
- Provide tenants the right of return in the event they must vacate their rental units to accommodate substantial renovation or redevelopment; and
- Increase relocation assistance for tenants subject to no-cause evictions.
    - Landlords would be required to pay households at or below 140% of median income for Los Angeles County a relocation allowance equal to two (2) months fair market rent as established by the U.S. Department of Housing and Urban Development (HUD).
    - In addition to the relocation allowance, a landlord must also pay the tenant a moving expense allowance in the amount of $1,120 for adult households or $3,364 for households with dependents, disabled or senior members.
- Offer financial assistance to low- and moderate-income tenants and prospective tenants, including Section 8 voucher holders, for security deposits and rent, by committing to evaluate the city's available funds during each budget cycle and to dedicate a reasonable amount to achieve this goal; Fund improvements at below-market rental units in exchange for landlords' covenants not to evict existing tenants or raise rents excessively.

We incorporate the details of these tenant protections from the South Pasadena Tenants Union comment, dated February 14, 2023.

Additionally, to further the goals of fair housing, the City should"

- Eliminate historic preservation policies and practices—including in ordinances, the Historic Preservation Element, and duties entrusted to the Cultural Heritage Commission—that impede development of affordable housing in the city, especially those impacting the city's transit corridors and Caltrans property sites;
- Review all properties that have been nominated for or placed on the city's Inventory of Historic Resources and/or designated as historic under the city's historic preservation policies;
- Codify the city's Sundown Town Resolution by adopting an ordinance that prohibits the use of historic preservation policies and practices that would cause discrimination or disproportionate economic harm on the basis of race, ancestry, national origin, color, religion, sex, or sexual orientation;

- Upzone currently zoned R-1 (single-family only) to R-4 (allowing for fourplexes) in the city's transit corridors, as identified in previous presentations delivered by the city this month;
- Implement Senate Bill 9 to encourage lot subdivisions and higher density in single-family neighborhoods rather than impede its use.

Best regards,

Care First South Pasadena

- **How addressed:** The Housing Element has been revised to address this comment by: 1) revising the program related to the surplus Caltrans homes and committing the City to add additional units to these properties as ADUs or Missing Middle housing where feasible; 2) adding a new goal and programs related to tenant protections, including a rental registry, right to return, relocation assistance, and rent stabilization; and, 3) committing the City to allow for Missing Middle housing citywide, except for in high fire hazard areas.

Comments on the 5th Public Review Draft Housing Element

South Pasadena Preservation Foundation (March 3, 2023)

Let it be stipulated and acknowledged at the outset that the process for the acquisition and disposition of Caltrans surplus properties in the City of South Pasadena created as a result of that agency's decision not to build a northerly extension of State Route 710 through the city is governed by myriad state laws and regulations, including but not limited to, SB 381 (2021). The purpose of providing the following alternative language for Program 1.b. of the Housing Element is not to circumvent or ignore the requirements of SB 381, an amendment to the Roberti Law, but rather to seek to prevent some very real externalities that perhaps were not contemplated when the legislation was drafted and signed into law, but which nevertheless will cause implementation of the letter of that law to undermine whatever well-intentioned spirit brought it into existence in the first place. These externalities include the inflation of rehabilitation costs created by requirements placed on the City or other Housing Related Entities that private individuals and families are not subject to, making acquisition and rehabilitation by those entities financially unfeasible. Another example of an unintended consequence of the existing law would be the concentration of affordable housing in one or two neighborhoods of the city where the surplus properties are located, rather than a more equitable and dispersed concentration throughout all parts of the city. The South Pasadena Preservation Foundation wishes to see the City promote creation of new affordable housing with as few constraints as possible, so that it has the flexibility to respond creatively and nimbly to a dynamic housing market and evolving community needs.

Program 1.b - Maximize the proceeds from the sale of the Caltrans surplus properties to create new affordable housing throughout the city

The California Department of Transportation (Caltrans) currently owns 68 surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena. The City will leverage the 20 unoccupied Caltrans surplus properties, two vacant lots and those of the remaining 46 occupied Caltrans surplus properties that are not purchased by former or existing tenants and use the proceeds from the sales of such properties to generate capital to create new, deed restricted affordable housing units throughout the city, whether on city-owned land, or on privately owned property. These proceeds can serve as a "force multiplier", by unlocking the combined equity of those properties and leveraging it to maximize funding for affordable housing creation and housing element implementation. Several alternatives exist within State law and Caltrans regulations for the City to partner with Caltrans to maximize the proceeds from the sales of the

Caltrans properties and place them directly into a restricted account (i.e. the SR 710 Rehabilitation Account) dedicated solely for the use of the City of South Pasadena to create affordable housing. Some other alternatives, after further study, may be financially infeasible so in order to promote affordable housing in South Pasadena all alternatives, including that proposed here, must be considered.

Eight-year Objective: To facilitate the acquisition and disposition of the maximum number of Caltrans surplus properties to individuals and families and to leverage the proceeds from the sale of these properties to generate capital for the creation of deed-restricted affordable housing units throughout the city to expand housing mobility opportunities for lower-income households and revitalize underutilized areas.

Funding Source: SR 710 Rehabilitation Account

Responsible Agency: Community Development Department/City Manager's Office

Timeframe: Begin implementation of sales program in 2023 and at least annually throughout the planning period until disposition of all surplus properties is complete.

- **How addressed:** The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of any of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Josh Albrektson (March 3, 2023)
Love the Housing Element and I am pretty sure it will be accepted.

I think you guys accidentally didn't include that the IHO would not apply to buildings under 10 units. I would add that.

On the South side of Monterey Road you have Victor Trans Site 3. He has mentioned before that he would like to put about 50 units on the site. I would consider making that half of the road Residential High Density zoning instead of Residential Medium Density. You could also then count Site 3 as 1.26 acres*45 units/acre rather than the 8 above mod units you are counting now. I'm not gonna complain about this but he is going to reach out to you.

The right of return program is also not quite right but that is something that could be worked on later. Here is a LA Times article on it.
https://www.latimes.com/opinion/livable-city/la-ol-gaisford-right-to-remain-gentrification-20180212-story.html

I've read the rest of it and I could not find anything else missing.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** The Housing Element has been revised to include an exemption to the IHO for developments under 10 units. Site 3 is included in the Ostrich Farm mixed-use area as shown in Figure A-3.b (Page A1-15). This area will allow for densities of up to 70 du/ac. While this site could yield significantly more units once rezoned, the City currently has an application in for this site which indicates that the property owner intends to construction eight (8) above-moderate income units on the site. Therefore, the Housing Element reflects the current development application submitted by the property owner. The property owner will have the option to submit a new development application for a greater number of units once the site has been rezoned. If the property owner chooses to do that in the future, it will increase the City's housing buffer beyond what is included in the Housing Element. Proposed tenant protection programs will be further researched and refined.

Victor Tang (March 5, 2023)
Hi Angelica,

This is Victor Tang, the developer for 181, 185, 187 Monterey Road with 1.25ac land and site #3 in city's site inventory. Our site is vacant and ready for development.

In the special joint meeting on 2/15/2023, Housing Element consultant Mr. Grant Henninger had proposed an Extended Ostrich Farm Zone with 70u/ac density that included Monterey Road. It had the support of planning commission members as Monterey road was wide with all the utilities available. However this zone was not implemented in the latest Housing Element Draft.

Although we have submitted a development plan for 8 market rate units, we are interested in a new development for 50-80 units including low income housing. Current Housing Element's density for our site is 30u/ac. We need a higher density (probably 50u/ac) for a new development to be financially feasible. If the city can give our site a higher density, we can withdraw existing 8-unit plan and the city can count additional RHNA from our site.

Best regards,
Victor Tang,

- **How addressed:** Site 3 is included in the Ostrich Farm mixed-use area as shown in Figure A-3.b (Page A1-15). This area will allow for densities of up to 70 du/ac. While this site could yield significantly more units once rezoned, the City currently has an application in for this site which indicates that the property owner intends to construction eight (8) above-moderate income units on the site. Therefore, the Housing Element reflects the current development application submitted by the property owner. The property owner will have the option to submit a new development application for a greater number of units once the site has been rezoned. If the property owner chooses to do that in the future, it will increase the City's housing buffer beyond what is included in the Housing Element.

John Lawrence (March 6, 2023)

The proposal to allow mult-unit housing anywhere in South Pasadena is a terrible proposal that would ultimately destroy the character, uniqueness and quality of life in South Pasadena. I understand there are concessions that are going to have to be made to the state housing plan but to simply say, "well OK, we will abdicate all control, all ability to self-manage our own destiny is irresponsible and destructive.

Who supports it his dystopian vision of South Pasadena? I'd really like to know. I suspect it is a purely political position being pushed by people who have no history, no investment, emotional or otherwise, and life connection at all to the city. Must be nice to look in from outside and advocate destruction when it doesn't affect you.

- **How addressed:** The comment misstates what is being proposed as there is not a proposal to allow "multi-unit housing anywhere" in the city. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Samuel Lin (March 6, 2023)
Dear whomever it may concern:

My wife has grown up in South Pasadena since she was a young little girl and I have since just moved been a resident for about 5 years. South Pasadena has always been known to be as a quaint small town everyone knows each other.

Until recently, there's been a lot of traffic, kids have been stuffed in schools. Even our own small elementary school in Marengo has a waiting list for the very same people who would live on the same street.

This proposal is not only going to bring in more congestion and traffic, it is going to change the very nature of our small city. We don't have the capacity to fit medium density because we eliminated the 710 freeway, we have a lot of traffic on Fremont. Also, you're going to turn our small beautiful city in a dense packed traffic, terrible place. I strongly urge you to reconsider the elimination of single family zoning, we do not need dense housing in this city, we cannot handle the traffic and we don't have the resources.

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Ed Donnelly (March 6, 2023)
City Planning staff,

It has come to my attention that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories.

This will significantly impact the very things that define living in South Pasadena. Over the past several years I have worked side by side with fellow residents to secure city revenue through the UUT and the increased local sales tax. We have worked diligently to secure and sustain funding for our schools and our public library. Those campaigns, while a tremendous amount of work, were ultimately personally rewarding for our volunteers because what we were truly campaigning for was sustaining our way of life here in South Pas. And voters here in 91030 overwhelmingly agreed with us

in every case. This is much the same as the generation before us fought tooth and nail to prevent the 710 freeway from tearing the town asunder. And despite all of this an existential threat now looms unnecessarily.

I fully support responsible development and the building of affordable housing here in South Pasadena. There are sensible options. In addition, I completely understand the demands of the HCD and the consequences of not complying with them as we are already seeing with the project on the Shaker's property. Embracing strategies that will immensely impact our police and fire departments, infrastructure and schools while drastically reducing tax revenue due to diminished property values isn't just simply foolish, it's irresponsible governance.

I urge you to find another way to realistically meet the RHNA numbers without destroying the fabric of our way of life here and dooming the city to be just another banal concrete wasteland on the edge of Los Angeles.

Ed Donnelly
1935 Edgewood Dr.
SOUTH PASADENA

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Delaine W. Shane (March 7, 2023)
Dear Community Development Department Staff and Management:

The fifth version of the Housing Element is insufficient. Furthermore, it does not adequately address legitimate questions and concerns that I brought up in my earlier comments on the previous versions. As a professional environmental planner with decades of experience, I know when I've been "blown off." So, my original comments stand and are part of today's comments to you. My intent is for you to reconsider some of the policies and make them more nuance or simply more limited in your approach and understand the underlying ramifications of them including financial burdens that will be placed on our city.

This whole process has been messed up. The housing element should have been part of the general/specific plan update. Now, it is not. When the CEQA process (environmental review) is finally undertaken for the plans, it's very essence has been destroyed. Since the housing element will be approved, it can not be modified during the general/specific plan environmental analysis. Even if the housing element causes significant environmental impacts as determined in the general/specific plans EIR, there is little recourse of modifying the housing element to lessen such impacts unless the council modifies the housing element itself. And that of course will not happen. The council won't do it and who will be paying for potential mitigations? It won't be the developer that's for sure. "Little things" like upgrading the Fire Department's capabilities to reach high rise fires, new and/or more expensive water supply sources to meet the needs of new housing units not to mention how water pressure can be created for such high rises, etc. It will be on the residents and businesses of this small city.

You can say that the issues of infrastructure, traffic, water supply, etc. is not a requirement of the housing element. That it will be part of the plan updates. But, really, they are all interrelated. So, maybe HCD doesn't care about our aging and inadequate infrastructure and public services, but the City governance needs to address these issues and plan on how to fix them NOW. And, that includes the financing of such improvements! "Kicking the can" down the road is irresponsible. What happened to the wishes of over 1,000 residents who initially participated in the general/specific planning process when David Watkins was the Planning Director? Residents had participated in that process for months and brought up reasonable growth scenarios of somewhere between 700 and 1,000 new housing units that could be accommodated in the next 20 years. The delays and the petty politics created what we now face. Credit of this latest fiasco is given to the planning consultants (all including the current one) that have failed to please HCD several times before. This version will probably be the one that HCD approves of because the consultant has given everything that the agency demands. The consultant should be responsive to our community and not have hidden YIMBY agendas. He doesn't even live in this region.

He indicated that we must accept SB 381 (Program 1.b-page 254). That is misinformation. Documented evidence has already been supplied to you that the side-by-side escrow can work and has been done before without implementing SB381. Many of my neighbors and I continue to support the return of the Caltrans housing to current/former Caltrans tenants or qualified buyers who will purchase these properties, fix them up, and live in them, and thereby add to the property tax base and contribute to the neighborhood's charm. Our neighborhood already has dense housing and our existing infrastructure is in terrible condition. Affordable housing as described in the housing element needs to be distributed in various areas throughout the City. It is also states that the City WILL construct ADUs on these parcels. First, it should be the homeowners' decisions as well as the practicality of building anything on some of these small parcels. Second, the "City WILL build" presumes the City owns the properties outright, and that would be a terrible mistake. Where is the funding for this? There are many problems with our existing infrastructure that equally need to be addressed but have been ignored due to a lack of funding. Or, at least that is what we have been told over the years.

For the special needs program (Program 2.h-page 263): The housing element states: "Eight-year Objective: Encourage construction of at least 50 accessible units, 50 units with three or more bedrooms, and 50 units affordable to lower-income households to reduce displacement risk and expand mobility opportunities in areas in close proximity to transit systems, commercial uses, services and amenities on appropriately designated sites within the Downtown Plan area, the Fremont Avenue/Huntington Avenue/Meridian Avenue neighborhoods, within properties identified for mixed-use potential, vacant higher density residential sites, City-owned sites, and underutilized non-residential properties." Are these related to the Caltrans housing? Or is this separate? There is no Huntington Avenue, it's Huntington Drive (it figures for a consultant that doesn't live here). Why isn't Fair Oaks/Mission/El Centro considered as well?

He indicated that we must comply with SB 10. Page 268 has a policy that states: "Policy 3.5: Provide objective standards and ministerial application processes to implement 2021 State housing legislation (SB 9 and SB 10) that requires the City to permit construction of two dwelling units on single-family lots and allows density increases for multi-family properties up to 10 units with a CEQA exemption." SB 10 is strictly voluntary and it is my understanding that the council had publicly backed away from supporting this previously. Why, therefore, is it in this housing element version?

For the height limitations policy (Program 2.n-page 267), why is the City so inclined to place so many limits on itself at this time? By having so many YIMBY restrictions and conditions, the will of the people that live in this City is being curtailed. This is clearly undemocratic and thwarts local control. Clever architects and innovative developers can create smaller housing units within our currently defined building height limit. But, apparently that isn't even considered in this version of the housing element.

For rezoning (Program 3.a-page 268), do the residents really know that you are proposing to rezone their properties in this fashion? The way this housing element has been advertised, you must know that most residents are unaware. As a cautionary aside, I remember traveling to Sedona, Arizona to view the red rocks over the years. Just before the pandemic, my husband and I took our then teenage daughter to Sedona. It was a disaster! Where once it was a sweet town with some tourists, it was now a complete zoo and utter chaos. Turned out that the State of Arizona had permitted opportunities for the Airbnb-type businesses and there would be no local control. In time, developers had bought up many, many houses and used each bedroom to rent short term to tourists. Local schools were impacted and at least one had closed because the population had shifted from residents to tourists. And the sites themselves had been compromised by such heavy influx. We can't correct a national crisis in housing by destroying our community. It's just a 3 ½ square mile city. The rezoning needs to be more nuanced than what is now being proposed. It is too much.

For mixed use (Program 3.b, page 268) developments and adaptive re-use, such tall buildings and limited to no parking, we might as well become either Glendale or Pasadena Annex. The height of the buildings alone question the ability of the Fire Department to respond to high rise fires, as well as the necessary water pressure to support fighting fires or having operational fire water sprinklers. Parking availability? Most people do not rely on the Gold (L) Line to get anywhere except perhaps to go to special events. The Mission/Meridian garage was noted years ago in a L.A. Times article that people were parking there from elsewhere to do shopping. Few to none were actually parking to use the Gold Line for work outside of South Pasadena. Families with kids or elderly relatives will still need cars whether gas- or electric-operated. Parking is going to be worse (not a CEQA issue but a real life experience nonetheless).

For demolition of vacant properties (Program 3.c, page 270), how does this program relate to the Caltrans housing? Does the program mean that automatically if a vacant Caltrans housing is "viewed" as not fixable, it will be torn down and replaced with three units at that site? Many of the Caltrans vacant properties are small and located on hills where soil stability may be an issue.

I do not support Program 3.d, page 271 (Enable Parcel Assemblage) as currently written. It emphasizes a strong and lopsided City-developer partnership when maybe the homeowner doesn't want to sell their property. There has to be support for the property owner as well. Forcing the property owner to sell their property would in turn create hardship for that resident. Home prices and mortgage rates are too high now and in the foreseeable future and so that property owner would not be able to resettle elsewhere in South Pasadena. That is outrageous. And your consultant never answered my question as to whether eminent domain would be invoked if the property owner was unwilling to sell.

Program 3.h, page 274, states that if the ADU numbers fail to materialize that MORE rezoning will take place! There are many reasons why people don't want to or are unable to build an ADU. But, regardless, if this magical number doesn't happen, we will be further rezone? Just how many people are we going to have here in a 3½ square mile area? Has that been calculated? Again, the financing for this unlimited rezoning journey? The schools? The streets? The water? This is ridiculous. Why

not just obliterate the zoning and put out the welcome mat for hordes of people? Watch the tax base shrink further because there will actually be fewer property owners. Floating bonds? Reducing municipal services? But, yes, make the YIMBYs happy. Whatever happened to responsible planning and considering possible future scenarios and costs?

I could go on, but I end with a plea. Look at the policies, each one very carefully. Are they really helpful to the residents and can they be financed and monitored in a productive and positive way by the City? Or, are they just offerings to appease YIMBYS? The financing must also be considered seriously.

Most of us agree to responsible and sustainable growth in the next eight years. I personally witnessed that with the individuals I met at the planning charettes years ago. Before you rush off this version to HCD, please review the policies individually and responsibly. Edits are needed to ensure sustainable growth.

Thank you,

Delaine W. Shane
2003 Meridian Avenue

- **How addressed:** The lawsuit brought against the City for failure to comply with State Housing Law caused environmental evaluation to be completed pursuant to Government Code Section 65759. The Housing Element is not subject to environmental review at this time. The City is preparing an Environmental Assessment that will be considered at the time of Housing Element adoption in accordance with applicable laws.
- **How addressed:** The City must follow SB 381 regarding the purchase and dispensation of the surplus Caltrans properties. The other options suggested in the comment are not legally valid. Per the March 7th draft, Staff will explore possible solutions.
- **How addressed:** Affirmatively Furthering Fair Housing (AFFH) is a requirement of the Housing Element under state Planning Law. The City is not opting into SB 10 citywide, but instead is using the framework of the law to create the Missing Middle Housing program to achieve the AFFH goals. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character.
- **How addressed:** The current height limit is a constraint on development. The City must eliminate identified constraints on development. HCD has questioned whether a building could be designed at 70 du/ac or more with a 45 foot height limit. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.
- **How addressed:** The City held three public meetings, on February 1st, February 9th, and February 15th to discuss the proposed zone changes to allow for missing middle housing.

Kristine Kwong (March 7, 2023)
I am requesting the City change the section of the housing element to limit the area that allows four-flex parcels on major traffic corridors only or near the Metro station. Since the City has a voter imposed height limit, I suggest removing the mention of 7-10 story building that are above the current limit until the time the voters have had a chance to consider this issue.

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. A revised height limit must be stated for certain parcels that allow for 50 du/ac or more must be included in the Housing Element to state what the minimum new height limit will be if the voters elect to remove the existing height limit. The recommended height limit change only applies to those specific areas. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Peter Giulioni (March 7, 2023)
Dear Armine,

Hopefully this finds you and your family continuing to be safe and healthy.

This is an out-reach from a SoPas community member, rather than a commissioner, so, please consider it through that lens.

Recently, it has come to my attention that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories. Is my understanding correct?

While I'm a relative new-comer to SoPas (I moved here with my family in 1996) I believe this will significantly impact the very things which define living in our community.

Over the past several years I have worked side by side with fellow residents to ensure passage of the UUT and the increased local sales tax. We worked to secure and sustain funding for our schools through SPEF initiatives, and even our public library. While a tremendous amount of work, it was/is personally rewarding for us as volunteers because we were truly campaigning for sustaining our way of life here in SoPas. And please note, I used the word "sustaining" not "protecting" - I am a proponent of thoughtful and conscious growth and expanded thinking. The advocacy of many of my SoPas neighbors can be seen as a continuation of the spirit shown by the generation before us who fought to prevent the 710 freeway from bisecting our town.

While not completely conversant around the demands of the HCD and the consequences of not complying with them; embracing potential solutions that will impact our police and fire departments, infrastructure and schools while potentially reducing tax revenue due to diminished property values seems counterproductive at best and irresponsible at worst.

Please consider this a "formal" request that you direct the city staff to find another way to "meet the numbers" without negatively impacting the very nature of our way of life here in SoPas. I believe we are special in so many ways, and don't want to see us become yet another "characterless" wasteland on the edge of Los Angeles.

As always, please feel free to reach out for more information or clarification.

Stay safe and healthy, warm regards, Pete

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Leonard Mlodinow (March 7, 2023)
To whom it may concern: I just heard that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories. I feel strongly that this would have an enormous negative impact on our community and that it is not in character with what I and my neighbors understand and appreciate as South Pasadena. I hope you can illuminate those changes from the plan.

Leonard Mlodinow

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023. The recommended height limit change applies only to specific areas. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Brian Bright (March 7, 2023)
Hi Council,

Living in South Pas has been a great experience. This city has a long history of preserving its identity, history, and way of life. South Pasadena was bisected in the 40's by the 110 and the people said "never again" to be pushed around by Sacramento, so they fought when the 710 expansion was going to decimate the city by splitting it into fourths with the 110. South Pasadena prevailed, thankfully, or this city would have been split up.

Now the overlords in Sacramento want to control our town again, adding an unreasonable amount of new construction due to a blanket law that pays no attention to the amount of apartments vs single family homes in each community. South Pas is almost evenly split with rentals vs single family homes, unlike many of our neighboring cities (looking at you San Marino). To make things worse, we have paid shills for the development industrial complex who have infiltrated our town and are on social media complaining about a lack of housing ad nauseum, all the while living in their affluent single family homes. How this expansion of units effects our schools, infrastructure, and way of life is never discussed in a logical debate.

Unfortunately, city council did not fight hard enough against the state punching down a few years ago, and here we are. 10 story buildings in South Pas, our of historic homes being able to be 4 plex apartment buildings...seriously? Lets fight now to preserve our town, we owe it to those who fought the good fight in years past and to every homeowner in this city!

Sincerely,
Brian Bright

- **How addressed:** The City has a requirement to address issues related to Affirmatively Furthering Fair Housing and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. The policies in the Housing Element fulfill those requirements.

Donna Scott (March 7, 2023)
To whom it may concern:

The new zoning proposal for South Pasadena is unacceptable.
Eliminating zoning for SFRs, as well as increasing building heights to 7-10 stores will completely change the character of our town.
Also, there seems to be a movement to push through this HUGE change without much discussion, or publicity.
I would request slowing the process down, making details known through local papers etc.,in order to get more input and allow for the proposal of different options.

Thank you.
Donna Scott
1970 La France Avenue
South Pasadena
626 840 7189

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies and programs in the Housing Element fulfill those requirements. Since May 2020, the City has held several community input sessions and recently held three: City Council meetings, on February 1st, February 9th, and February 15th (Joint Meeting with the Planning Commission) to discuss these changes. The City has a court-imposed timeline for responding to HCD's comments, which necessitates the speed with which the City is acting on these policies. Additionally, the City has a page dedicated to the Housing Element where all updates have been posted.

Bruce A. Finstead (March 7, 2023)
We are writing you because we fear that South Pasadena's approach to the state mandated Housing Element requirements may destroy the small-town atmosphere of the city where our family has lived since 1971. We are well aware of the NIMBY potential of our comments and the difficulties you have in balancing the desires of our small community with the societal need to provide additional affordable housing for California residents. We further realize the frustrations of dealing with regulations that may well not take into account the divergent needs and desires of small vs large communities.

Of paramount concern to us is the proposal to eliminate single family residential zoning throughout the city. Among the many characteristics of our city that make it special are its neighborhoods of people living next to one another in single family homes. Neighborhoods have people with bonds developing over years; this cannot occur if multifamily dwellings with relatively short-term residencies are intermingled with homes of families living there for years, or even generations. Expanding the areas or corridors where multifamily residences are allowed is not the ideal situation, and may be necessary, but to eliminate single family residential zoning for the entire city should not even be under consideration.

South Pasadena does not have much undeveloped land; it may well be necessary to go up rather than out to obtain more developable space; raising the building height limits may be aesthetically undesirable, but it may be a necessary concession to the state. It might be more tolerable if mixed use buildings were required with businesses on the ground floor and residences above. Is it possible to provide financial incentives to current "tall" building owners to convert their buildings to mixed business/residential use?

Thank you for your consideration. If you wish additional input from us, we would be pleased to provide it.

Bruce A. Finstead, M.D.
Melissa Finstead
1947 La France Avenue, South Pasadena

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023.

Michael Girvigian (March 7, 2023)
Hello,

As a longtime resident of South Pasadena, I urge the city staff to significantly re-think the latest draft of the city's housing element.

I understand there is a statewide mandate to increase housing, which is several years old now.

This statewide mandate, however, was made at a time when the projected state population by 2040 was 50 million people.

The population growth has stopped, and the state population is shrinking.

The state's population could remain stagnant for the foreseeable future.

There are a number of reasons for this, which include: increased out-migration, reduced immigration, low birth rates.

Future mass transit ridership adjustments are already underway based on new projections of shrinking population growth.

High speed rail update gets closer to reality, but major risks remain
https://www.masstransitmag.com/rail/news/53027098/ca-how-many-people-will-use-californias-bullet-train-planners-lower-ridership-estimates
High speed rail update gets closer to reality, but major risks remain

Thus, destroying the quality of life of the people in small towns, in the name of an outdated mandate, is not fair or equitable.

I urge the city staff to re-think this latest draft of the housing element.

Sincerely,

Michael Girvigian
310 Meridian Ave.
South Pasadena

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Cathleen Hoadley (March 7, 2023)
I've been made aware that the latest draft of the Housing Element includes the elimination of zoning for single family homes citywide as well as a proposed building height limit increase to seven stories.

I can't even imagine South Pasadena suddenly having a skyline with buildings higher than four stories; it will completely change our little town. The other issue is that we have neighborhoods with single family homes, and also certain parts of town with high density apartment buildings, and then there are some areas with a healthy mix of both, but none are higher than four stories.

My neighborhood of Buena Vista/Foothill/Prospect/Meridian/Highland/Fairview, nestled between Fremont on the east, Orange Grove on the West, and just north of the 110 freeway (Foothill) and bordered by Columbia on the north, has no apartment buildings at all; if someone were to purchase a home, and raze it, and put up a multi-unit apartment building, that would completely change the nature of the neighborhood I have been fortunate to live in for the past nearly 23 years. I have neighbors on all sides who have lived on Buena Vista for coming up on 50 years. These are the people who fought the 710 extension which would have ruined South Pasadena forever. I know many people are creating ADRs, which are welcomed, but perhaps not enough.

Please be mindful of how being able to construct a new apartment building with four units in the middle of a solely single family neighborhood will drastically impact the nature of these traditionally single family home neighborhoods.

Thank you,

Cathleen Hoadley
1109 Buena Vista St.
South Pasadena, CA 91030

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Sandy Kitto (March 7, 2023)
To: The City of South Pasadena

As long-time residents of the city, we reviewed the current draft of the City of South Pasadena (City) 2021-2029 General Plan Housing Element with concern. The elimination of single-family zoning, and the height limitations for multi-family residential units reaching 7-10 stories would negatively impact the appearance and personality of the city that attracted so many residents like us.

These concerns are as follows:

- The universal elimination of single-family zoning is short-sighted in allowing up to four units being built on a single parcel anywhere in the city. Many parcels in the city, such as our house on Bonita Drive, would be challenging if not impossible to accommodate four units, yet that would be permitted. The construction would create unimaginable chaos for the neighborhood, and a parking nightmare afterwards.

We suggest that a parcel size requirement be included that would limit this expansion to parcels that could reasonably accommodate the units and parking for the residents.

- The current plan eliminates the requirement for parking for any construction within a half-mile of mass transit, most likely the Gold Line at Mission Street and Meridian Avenue. Imagining multiple seven story buildings in that neighborhood, would create mammoth parking issues. Just because people live near the Gold Line does not mean they work in an area serviced by the Metro. And even if that were the case, it does not eliminate the necessity of having a car in the Los Angeles metro area for errands and weekend travel. Even the grocery stores on Fair Oaks Avenue may exceed the resident's willingness to remain pedestrians while carrying groceries.

So many of these residents will still have vehicles clogging the limited parking available. This potentially would impact the merchants along Mission Street by blocking customers from accessing the area.

We suggest reducing the height restriction (and thereby the number of units), AND requiring parking accommodation be part of the project.

- From an aesthetic point of view, allowing new construction of 7-10 stories is a dramatic change from the current situation in the city. A sudden influx of 7-10 story buildings would forever alter the landscape of South Pasadena; blocking mountain views, casting huge shadows on adjacent parcels, and reducing the charm of the neighborhood. The Eclectic Music Festival, and semi-annual Arts Crawl would be a completely different "vibe," as would daily living.

We suggest limiting the height maximum to a more reasonable 4 stories to maintain the City's appeal.

For these reasons, we urge the City leaders to reconsider the plan as currently proposed.

Sandy Kitto and Joe Walters
911 Bonita Drive
South Pasadena, CA

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements, as well as incorporate other state requirements such as elimination of parking requirements in close proximity to transit. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the City. This revision was released for public review on March 7, 2023.

Sally Kilby (March 7, 2023)
To Whom it May Concern:

One change I would request is that buildings of up to a fourplex be limited to parcels on such major traffic streets as Fair Oaks, Huntington, and Fremont, and to those near the Metro South Pasadena station. I would also recommend excluding mention of 7-10 story buildings since South Pasadena has a voter-imposed building height limit. Citizens can be asked to vote on this at an upcoming local election.

Sally Kilby
City Clerk, Retired
1000 El Centro Street
South Pasadena

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. A revised height limit for parcels that allow for 50 du/ac or more must be included in the Housing Element to state what the minimum new height limit will be if the voters elect to remove the existing height limit. As to the actions regarding the height limit, indeed the action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Linda Poore & John Poore (March 7, 2023)
I have lived in South Pasadena for 47 years and taught many years at all 3 elementary schools. This community is filled with many creative innovative people who have solved many problems over the years including The 710 freeway corridor , library funding, numerous tax raises to improve services, etc. It's time to find solutions that involve input from many residents, including reviewing how other small communities are complying to the new requirements. Please feel free to contact me at any time.

Linda Poore & John Poore
1964 La France Avenue
South Pasadena, CA 91030-4608

1-626-390-0059

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Mike Mitchell (March 7, 2023)
As a new owner of a single family home in South Pasadena I have serious concerns about the changes being suggested by local and state government. I am understanding of the need for more units and lower income housing to create more access to housing for a wider range of individuals, but the changes are too extreme and will have deleterious effects on the community.

As someone who has spent over a year waiting to get planning permission, I understand that the city takes very seriously the cohesiveness of neighborhoods and how that cohesiveness affects home ownership for us all. Suggesting that it is acceptable to go from areas entirely comprised of single family homes to suddenly giving large investors the right to build complexes over 7 stories high is incredibly extreme. Even tempering this suggestion to complexes of 3-4 stories would have an impact, but would be understandable given the state mandate for increased housing. People have invested huge sums of money in their home here to live in what feels like a special community. We want more people to have access to it, but not at the expense of damaging those people's investments.

It may seem callous to talk about investment in a community in financial terms, but those investments are people's future stability, and in Southern California represent a huge portion of a person's material wealth. It is even more callous to wantonly disregard how difficult home ownership is in this state by diminishing people's values and subsequently their future stability.

Change is needed in order to bring new, lower income families into this city, and more of them. Change should however, be brought about in ways that do not damage the existing balance in the community but rather improve it. I would like to think that the very intelligent members of our local government can find a way to bring about the changes we need while preserving what drew people to this community to begin with.

thank you,

-Michael Mitchell

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Keith Tsang (March 7, 2023)
Hello,

I would request the city change the following section of the housing element to limit the area that would allow up to a four-plex to parcels on major traffic corridors only, like Huntington, Fremont and Fair Oaks or near the Metro station. Also, since the city currently has a voter imposed height limit, I

would recommend removing the mention of 7-10 story buildings that are above the current limit until such a time when the voters have had a chance to weigh in on this.

Keith Tsang
1440 Indiana Ave

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Nicholas Greco (March 7, 2023)
The city's infrastructure cannot handle the additional volume of residents should the four Plex allowance be authorized. Homeowners pay the majority of taxes and this will lead to an undue burden on the homeowners of South Pasadena and a decline in the quality of schools and city services that we all cherish. State mandated ADU add ons that are rentable will bring in additional residents while also allowing for increases in property tax revenue by the homeowner. Please don't disrupt our way of life and diminish the quality of our quaint town. We hope that the City Council considers this as they were elected to protect the way of life that South Pasadena homeowners and residents have come to appreciate.

Sincerely,

Nicholas W Greco MD, FACEP
Operations Director
Emergency Department
Huntington Hospital

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

South Pasadena Tenants Union (March 8, 2023)
Dear Ms. Becker and Ms Fausto:
South Pasadena Tenants Union leadership are pleased to have reviewed the March 2nd, 5th Draft of the Housing Element. It was/is a bold and expansive housing element, one which might even be the best in the Southland. We applaud staff for the inclusions of the tenant protections and the acknowledgment that preserving affordable housing is a priority in this process. We look forward to working with the City, the residents of South Pasadena and the Council to ensure that these policies are the best that they can be and are enacted effectively and within a timeframe that is beneficial to those whom they are intended to protect: the 53.5%.

We are however surprised to learn that as of last night, the original draft of March 2nd has already been substantially revised and without any published responses/comments indicating public input. In reviewing the March 7 redline version, we are disappointed to see that the proposed program addressing the fate of the CalTrans homes and the implementation of SB381 has changed drastically from the March 2 version. It is our understanding that there are no legal alternatives to SB381 and therefore we are stymied by this latest change.

With regard to the revision indicated by the March 7 version for citywide fourplexes, also significantly different from the March 2nd draft, we find that we can remain wholly supportive of the current proposed change with a modification. We can support triplexes and fourplexes being limited to the high transit areas but we will need the City to commit in the Housing Element to a rent stabilization ordinance that is fully enacted no later than June 2024. Therefore, our one public comment regarding the most recent March 7 version of the 5th Draft Housing element is below:

> *For program 6.d, SPTU asks that you include within the 5th draft a deadline of no later than June 2024 for implementation of a rent stabilization ordinance.*

South Pasadena Tenants Union looks forward to seeing our input included with the expediency that other revisions have been made in the last few days so that we can comfortably and wholeheartedly commit our support of the 5th Draft to HCD. We appreciate and trust that staff will do as proposed, but will need to see good faith that the City weighs our input equally to that of other influencers in the community by including our abovementioned request.

If you have any questions or would like to discuss, I look forward to hearing from you. I can be reached Anne Bagasao at eabagasao@hotmail.com or by phone at 626-660-8837.

Sincerely,
Anne Bagasao, Co-Founder

- **How addressed:** The timeframe for Program 6.d requires that City Council consider a rent stabilization ordinance no later than December 2023.

Jenny Bright (March 8, 2023)
Very well said!! I am in agreement that we need more affordable units. It is the heavy hand of Sacramento overriding local control with threats that is not in the spirit of South Pasadena. Rezoning is the wrong direction. There are still locations in town to add affordable housing that we can support financially without having to erode the entire character of the City. We already have >50% rentals here so it is not as if we are out of balance.

On Wed, Mar 8, 2023 at 8:15 AM richard schneider <rdschneider0@yahoo.com> wrote:

> I am certainly in favor of the city having a mixture of housing for different income levels. We need more units for low and moderate income levels. When I and my wife moved here years ago we were low income renters. But I think the provisions suggested for the new Housing Element, however well intentioned, are going in the wrong direction. What is needed is state subsidies for affordable units distributed throughout the city. Some of that subsidy money could be obtained by market rate sale of Caltrans properties. There are thousands of Caltrans properties around the state which could be utilized.
>
> The current housing crisis was not caused by the City of South Pasadena nor its residents. And responsibility for crisis solution should not be transferred from the state to local communities.
>
> Yours very truly,
>
> Richard D.Schneider, MD

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable

homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Dan Evans (March 8, 2023)
Ladies and Gentlemen:

I believe it may be a mistake to treat this issue as normal, administrative "compliance" with properly-enacted state law. In reality, we do not face normal legislation in SB 9, SB 10, etc. What we face is an attack on the way of life we choose to live in South Pasadena. Big-government social activists have seized the single-party government in Sacramento for a social revolution – to eliminate the middle class by removing our choices on how we live. We choose to live in single-family homes with gardens, not in massive housing projects as the social revolutionaries in Sacramento insist.

Confronted with a social revolution, "compliance" is a weak, conciliatory approach which will further empower the social revolutionaries. South Pasadena led the way against big-government plans to build a freeway through town, we should also lead resistance to these Big Brother housing efforts. Our resistance will lead to litigation; eventually cooler heads in court will see that SB 9, SB 10, etc. constitute a "taking" of property without due process. (fyi – I have taught Constitutional law.) We must stand up for the way of life we choose to live, not cave to big-government activists!

Dan Evans
dmevans@southpas.org
(626) 403-0575

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements.

Felix Gutierrez (March 8, 2023)
Dear South Pasadena City Leaders:

I understand that an elimination of Single Family zoning in South Pasadena has been proposed and is being considered by the city government.

Please register my strong support for continuing Single-Family Housing Zoning in the range of zoning options available to the city and residents. Other options should also be included and new ones added without eliminating one that has served the city well over the years and is needed for the future.

Single-family homes are a defining characteristic of some of our neighborhoods. Eliminating that zoning option could lead to overcrowded lots, schools, streets and parking spaces, not to mention additional demands on police, fire and other first responder services. We have already seen these overcrowding impacts on nearby cities.

I strongly urge you to keep South Pasadena's best long-ranges interests in mind as you contemplate possible changes.

Sincerely,

Félix Gutiérrez
632 Milan Avenue
South Pasadena, CA 91030

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The Housing Element includes policies that commit the City to allow for missing middle housing types along high-quality transit corridors, if property owners so choose.

Laurie Chatham (March 8, 2023)
Dear All Concerned,

The DRAFT Housing Element has come to my attention via my concerned neighbors. I wanted to give my input as a concerned community member, having lived in South Pasadena for 26 years, and having visited my Great Aunt in this city since 1958.

Is it true that the DRAFT includes elimination of zoning for single family homes throughout the entire city? Is it true that there is a proposed height limit for buildings being increased to seven story structures? These proposals will have a negative impact on South Pasadena and are extreme. We have seen how other neighboring communities have allowed higher density development on lots that previously contained a single family home. There is significantly more traffic and the community atmosphere is negatively impacted. Please consider limiting the change in zoning to the high transit corridors (not city-wide) and elimination of references to seven or more story buildings in South Pasadena.

Thank you for your consideration,

Laurie Chatham
1915 La France Ave.
South Pasadena, Ca. 91030

How addressed: No, it is not true that zoning for single-family homes throughout the City is being proposed. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. It is also not true that the height limit is being increased. The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Deni Sinnott (March 8, 2023)
I am writing to comment before today's deadline on South Pasadena's plan to build affordable housing.

I am confused by the fact that the city wants to march forward on the plan to supply affordable housing but has decided the Golf Course is off limits.

From Appendix B:

Has the City looked at the Arroyo Seco Golf Course as a suitable housing site for affordable housing? - City staff responded that converting the golf course into homes is an option, but one that is not politically popular and therefore not proposed as part of the Housing Element at this time.

Who is the council affiliated with that they need to back off from using this piece of land for the plan?

It would seem to be ideal and could be used to create housing in the Arroyo which is idyllic compared to some of the sites proposed, in particular, JAMMING housing on smaller parcels or even in between current houses that exist on residential streets.

I am in favor of lifting height restrictions on buildings but those newer, taller buildings would need to be built on major thoroughfares.

We do need to build more housing and there are some buildings/parcels that I just know could be purchased to accomplish this tasks are:

- Crash Champions Body Shop on 300 Fair Oaks- two large lots could accommodate 1 building each.
- 1499 Huntington Drive office building at Fair Oaks (old and needing rehab) Occupancy is not 100%. I believe this is taller than 4 stories already!
- Bargain Market and adjacent retail could also be used for new homes/apartments/condos.

I am sure there are many more places in the city that could be repurposed without disturbing the streets where we have mostly single family homes. If ADU is a desired route, the city should subsidize the building of those to homeowners who would like to participate and STREAMLINE the permitting process to be less onerous.

--

Deni Sinnott
Homeowner, 2066 Fletcher Avenue, South Pasadena
CLPF, NCG, MBA
626-233-4128

- **How addressed:** The golf course was considered as a housing site during the February 1st City Council meeting. The City Council directed staff to find alternative to accommodate the city's housing needs that did not remove recreational open space from the City. The Housing Element does consider these other parcels as potential candidates for redevelopment, but the City does not have substantial evidence that they will be redeveloped during the planning period. As the Housing Element is part of the General Plan, it must be consistent with other General Plan elements, including the Open Space Element which requires sufficient recreational space for the residents of the City. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo in the future.

Mary Urquhart (March 8, 2023)

The recommendation to repeal the current 45-foot height limit on any residential or mixed-use project is in opposition to the vast majority of residents. The minimum requirements of 84 feet and 7 stories or 110 feet and ten stories, depending on whether the project is in an area with a density of 50 or 100 units per acre, respectively, is unacceptable.

However, the approach of layered zoning in major corridors has the potential to be a bonus to our City. Mixing affordable housing with middle and higher-income housing options along with retail in major corridors that have a much higher traffic flow, such as Huntington Drive, should be listed as an option. Once the HE is approved, we can explore ways to work with our community to do this where this may be a bonus to our community. Areas that may apply to this concept are located on Huntington Drive and Arroyo, which are currently not offered in the current HE.

The second area that is of deep concern in the 5th draft is the implementation of SB9 and SB10, the Missing Middle Housing (MMH). SB10 is NOT a mandate and our City and our City were not considering this. Why was this included? Can you imagine this being allowed in our historic Bungalow Heaven? This language should not appear in our HE.

I do applaud the hard work that our City Planning Department has done in the past few months to pass an acceptable HE.

- **How addressed:** The action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review. The City has a requirement to address issues related to Affirmatively Furthering Fair Housing (AFFH) and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. Removing or increasing the current height limit is the only way to accommodate the RHNA requirements without upzoning the existing low-density residential zones. The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. The policies in the Housing Element fulfill the requirements of AFFH.

Mary Farley (March 8, 2023)
There was given no time for working people in South Pasadena to respond to this proposal. We are being railroaded and this needs to be litigated. The impact on our tiny town is wildly disproportionate compared to contingent communities.

When my family moved to South Pasadena from Boston forty three years ago, we asked my husband's employer, USC, what would be a good place for a mixed race family to relocate near the medical school, and the suggestion was South Pasadena.

The introduction of racial elements into this battle over development is bogus and there should have been adequate time in which to challenge it.

- **How addressed:** Since May 2020, the City has held several community input sessions and recently held three: City Council meetings, on February 1st, February 9th, and February 15th (Joint Meeting with the Planning Commission) to discuss the Housing Element revisions. State law requires that all housing elements address racial wealth and homeownership gaps as part of the Affirmatively Furthering Fair Housing (AFFH) analysis.

Eric Hausner (March 8, 2023)
Dear City of South Pasadena,

As a home owner and resident of South Pasadena, I wanted to provide feedback on the proposed General Plan Housing Element. In particular, I am concerned with allowing duplexes, triplexes or fourplexes throughout the city.

This change will fundamentally harm the fabric of South Pasadena that makes it so unique and special. Instead, I would suggest limiting these changes to major traffic corridors only, such as Huntington, Fremont, Fair Oaks, Mission (near downtown) or near the Metro station.

I also think it's a good idea to wait on revising the height limit until voters have had a chance to cast their votes on the matter.

I understand the enormous pressure the city is under to make these changes. However, hopefully we can find a way to be compliant while also preserving the character and history of this amazing city.

Respectfully,

Eric and Emily Hausner
1722 Milan

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. The Housing Element does not change the height limit, it commits the City Council to bring forth a voter initiative to consider repealing or replacing the height limit and provides a new height limit if it is replaced.

Helen Mendoza / Pamela Privett (March 8, 2023)
To the City Council:

While we are in favor of increasing and diversifying housing within the city of South Pasadena, we believe the new draft of the Housing Element is at best, extreme and out-of-line, and at worst, thoughtless and irresponsible. As we understand it, the new draft 1) eliminates zoning for Single Family Homes 2) allows for development of up to 4 units on any property city-wide and 3) raises building height limits to 7-10 stories.

These are outrageous rules and will 1) negatively impact the property values for all residents in the city 2) severely encumber a school district already stretched to the limits on space and resources and 3) destroy the very character and quality of life that has made South Pasadena the kind of community people want to live and raise their families. In addition, we feel you have failed to consider that the city's infrastructure is neither designed nor capable of dealing with the increased need for resources should these new rules go into effect.

Yes, we need to find a solution for affordable housing for the city's residents and those who want to move here. However, doing so by creating rules that will make it possible to fundamentally change the fabric of our town and destroy the value of historic neighborhoods like Buena Vista in the northside or Edgewood/Milan/Stratford to the south side or those in Monterey Hills would be irresponsible and negligent.

South Pasadena's "calm" within the "chaos" of Los Angeles is what brought us here. We wanted to raise our children in good schools and live in a diverse and welcoming community. It was the history of the old house we got to restore, and the small town neighborliness we love that have kept us here.

There is a saying about buying real estate — don't purchase a single family home that has a multiple family unit on the block. The city's new plans will make it possible to put multi-unit apartments on ANY property… and that would devalue all the property for all residents.

These new Housing Elements would fundamentally destroy the face and skyline of the city, and it would in turn dismantle South Pasadena's character and heart.

Every city is having difficult conversations about how to deal with their fluctuating population densities. The draft presented, however, is short-sighted and misguided. Surely the city can find more creative solutions to these issues than what has been put forward.

Helen Mendoza / Pamela Privett
Buena Vista Neighborhood
201 Beacon Avenue

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Jenny Bright (March 8, 2023)
South Pasadena is a wonderfully unique City with a balanced housing stock of owners and renters and also a balanced and diverse population of residents. Eliminating single family zoning would erode the entire character of the City that attracted its diverse population in the first place. It would make the City indistinguishable from every other community just outside of LA. Raising the height limit of buildings would be an irreversible step and make this City that has been so thoughtfully preserved for the last 135 years unrecognizable. We can and should add affordable housing units but we can do this without destroying the City.

-Jenny Bright

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals. The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. As to the actions regarding the height limit, the action taken through the Housing Element adoption does not eliminate the existing height limit or create a new height limit. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Jim Tavares (March 8, 2023)
I believe there is general consensus that it is the right thing to create more housing within South Pasadena; the concerns are how that housing is created, what it looks like, and ensuring it does not

create unintended consequences of congestion and loss of South Pasadena's community feel. If South Pasadena simply becomes a place, and no longer a community, the process will have failed.

I don't think that has to happen.

I think roundly rejecting SB 10 is a must, as is rejecting the idea of a ballot measure for unlimited building heights at 50 du/acre. It will create endless disharmony between opportunistic developers and residents and break the character of our community. An 8,000 sf lot with ten units on it will accomplish the density needed to exceed 85 feet in height and shadow a residence next door.

Market rate sale of Caltrans properties can go a long way for Los Angeles as well as South Pasadena to fund more affordable housing projects vs. repurposing of these homes and the costs to do so--private owners can purchase and rehabilitate the homes with the sale profits going to other projects throughout the city, retaining the character of existing neighborhoods.

I think it is folly to have any properties that do not supply parking at a rate below one per unit, and higher form 2+ bedroom units, despite proximity to public transportation. While I hope public transportation will be used and ease congestion, ridership has trended down over the past 5 years, and while it has recently been on the upswing among certain demographics, safety concerns and reliability/destination proximity will likely force many into their cars, no matter where they live, straining surface streets for parking access.

Lastly, massing at the street and a provision for length of unbroken wall in a given plane and raking of massing from the street, with some green space around structures can go a long way to preserving the community feel so many have come to South Pas to experience. these details need to be ironed out in the Housing Element to ensure development that people want to stay within and around.

Very truly yours,

Jim Tavares

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. Per a Court Judgement, the City must place a measure on the ballot to repeal or amend the current height limit.

How addressed: SB381 has state-mandated requirements on how to acquire, utilize, and transfer homes currently owned by Caltrans. The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of any of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Mark Gallatin (March 8, 2023)

The City of South Pasadena has made tremendous progress under unprecedented circumstances toward the development of a housing element that can satisfy the rigorous requirements of state law. Now however, with a court-appointed deadline for completion looming, this progress could be endangered by two proposed programs in the 5th draft of the element that, as presently constituted, do not yet reflect the most creative approaches to the issues they seek to address and will quite likely provoke opposition from many residents.

The first of these is Program 2.n, the Citywide Height Limit Ballot Initiative. This program calls for a referendum on repeal of the current 45-foot height limit on any residential or mixed-use project on which the housing element anticipates a base density in excess of 50 units/acre. It proposes to replace the current height limit with either no height limit or a minimum requirement of 84 feet.

The reason for essentially doubling the current maximum height to a new minimum height is ostensibly to accommodate the greater densities planned in localized areas to stated density goals in order to help the City meet its RHNA target and to achieve the densities identified in the Downtown Specific Plan (DTSP). Despite being revised to reflect a lower minimum height limit, the current language of Program 2.n still tracks with that from the State of California's Department of Housing and Community Development. As such, it does not yet reflect a locally developed solution created with input from community members, appointed and elected officials seeking to maximize compliance and minimize harm, a thoughtful, more nuanced approach that better aligns with the tradition and character of the city's built environment.

What might such an approach look like? For starters, it would restate the modest proposal made by the City's original general/specific plan consultant to consider raising the height limit along Fair Oaks Avenue frontage properties within the DTSP from 45 feet to 50 feet to facilitate well designed and proportioned four-story buildings on Fair Oaks Avenue.

Second, it would draw on the incredible depth of talent, expertise and experience of design and architectural professionals that call South Pasadena home, as well as interested laypeople, to fashion a strategy that de-emphasizes governing metrics such as minimum height in feet or number of stories and instead focuses on standards such as floor area ratio (FAR) and unit size to create a "building envelope" capable of accommodating the desired densities within the confines of the existing height limit or a modesty increased one. That such an approach can yield the densities contemplated in the DTSP or in overlay zones on arterial corridors has already been demonstrated by projects completed in cities across the region, in locations as diverse and different as Santa Monica and San Gabriel. The inclusion of some of these standards in the latest draft of Program 3.b is a good beginning but it is hoped they are just the starting points for further discussions rather than faits accomplis, as the real work will begin when drafting new zoning provisions to implement the adopted element. Creative approaches to density, such as the "layered zoning" approach on major corridors, as recently presented at a WISPPA forum on the housing element, should be given serious consideration and embraced, lest we become consigned to monolithic housing blocks with minimal setbacks and amenities. Density simply doesn't have to be done that way, as history both here and abroad should have taught us.

The second program of concern in the 5th draft is Program 3.m, Implement SB 9 and SB 10. Missing Middle Housing (MMH) is a key strategy in helping the City meet its housing goals but it should in no way be conflated with SB 10. MMH was being successfully implemented in California and other states long before SB 10 was even dreamed of. SB 10 is not a mandate to be blindly followed by cities under threat of penalty but is in fact legislation that requires that cities opt into it voluntarily. Our City Council wisely voted not to opt into SB 10 when presented with the opportunity to do so. MMH can

be implemented with greater flexibility without choosing to opt into SB 10. By placing the very valuable strategy of MMH under the aegis of SB 10, Program 3.m unnecessarily stokes fear in residents to the detriment of acceptance of the housing element as a whole.

The key policy question for the city as regards the implementation of MMH is whether to apply it only in selected areas of the city or allow it citywide as what planners refer to as a "floating" zone. Such a zone is not tied to a specific area, but rather would make MMH a possibility on any residential property that meets certain objective design and development standards. The latest draft of Program 3.m favors the former approach by establishing a nexus between the location of MMH housing types and proximity to high-quality transit corridors and/or transit stops. Such a nexus is logical, given the importance high-quality transit corridors and/or transit stops played in determining the City's RHNA allocation. Suffice it to say that perhaps preliminary criteria, such as minimum lot size, can be established to screen out areas where MMH might be infeasible, being mindful of the fact that some neighborhoods have a preponderance of lots less than 5,000 square feet in size.

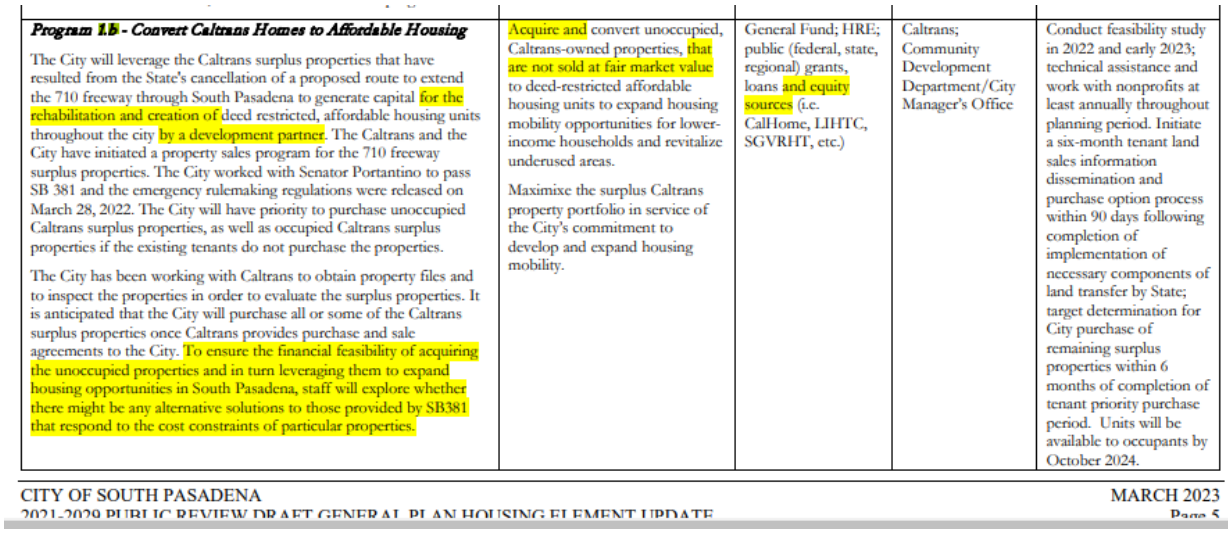
In conclusion, the shortcomings of Programs 2.n and 3.m not withstanding, the latest update of the 5th draft of the Housing Element is appreciated and raises hopes that the conversation around implementation changes from one about terms like density, multi family and upzoning and instead begins to focus on form, scale and housing types. The first version of the 5th draft was representative of a philosophical approach which has dogged the preparation of the housing element from the beginning. That is, whether to craft a creative comprehensive and inclusive grassroots approach to housing policy that reflects and respects the will of the people or to place trust in the community's future with an all-knowing, all-powerful state government dictating and mandating from on high. With the element so close to completion now, it is sincerely hoped that the choice will be the former, rather than a community vision of the state, by the state and for the state.

- **How addressed:** The new height limit in Program 2.n is not a minimum height, it a revised maximum height limit to allow for the densities identified in the Housing Element. If the height limit is replaced, the new height limit shall be no less than 84 feet. Nothing in this would prevent a land owner or developer from proposing and constructing a building that is less than 84 feet. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.
- **How addressed:** The City is not opting into SB 10 but instead is using the framework of the law to create the Missing Middle Housing program. The program will have specific objective design standards to allow certain housing types that are consistent with existing residential character. The Housing Element is specific about which housing types the city is going to consider as part of its missing middle housing implementation, as well as the areas of the city where missing middle housing will be allowed.

Delaine W. Shane (March 8, 2023)
Dear Community Development Department Staff and Management:

Thank you so much to be willing to making last minute text edits on the proposed housing element. I will limit my response in this email to Program 1.b concerning the fate of the Caltrans housing. Some of your yellow highlighted text I get are meant to be a compromise, but they are so wishy washy that

"explore" means nothing. There is no real commitment. Here are my suggested revisions, based on the latest version online



Program 1.5 - Convert Caltrans Homes to Affordable Housing The City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by a development partner. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City will purchase all or some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any alternative solutions to those provided by SB381 that respond to the cost constraints of particular properties.	Acquire and convert unoccupied, Caltrans-owned properties, that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas. Maximixe the surplus Caltrans property portfolio in service of the City's commitment to develop and expand housing mobility.	General Fund; HRE; public (federal, state, regional) grants, loans and equity sources (i.e. CalHome, LIHTC, SGVRHT, etc.)	Caltrans; Community Development Department/City Manager's Office	Conduct feasibility study in 2022 and early 2023; technical assistance and work with nonprofits at least annually throughout planning period. Initiate a six-month tenant land sales information dissemination and purchase option process within 90 days following completion of implementation of necessary components of land transfer by State; target determination for City purchase of remaining surplus properties within 6 months of completion of tenant priority purchase period. Units will be available to occupants by October 2024.

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If financially feasible and demonstrated as such in writing by a qualified financial expert, the City will leverage the Caltrans surplus properties that have resulted from the State's cancellation of a proposed route to extend the 710 freeway through South Pasadena to generate capital for the rehabilitation and creation of deed restricted, affordable housing units throughout the city by an experienced, qualified development partner in the affordable housing construction industry. The Caltrans and the City have initiated a property sales program for the 710 freeway surplus properties. The City worked with Senator Portantino to pass SB 381 and the emergency rulemaking regulations were released on March 28, 2022. The City will have priority to purchase unoccupied Caltrans surplus properties, as well as occupied Caltrans surplus properties if the existing tenants do not purchase the properties. The City has been working with Caltrans to obtain property files and to inspect the properties in order to evaluate the surplus properties. It is anticipated that the City may purchase some of the Caltrans surplus properties once Caltrans provides purchase and sale agreements to the City. To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will prioritize and pursue alternative solutions, including the side-by-side escrows or double escrows, outside of SB381 that respond to the cost constraints of particular properties.

Acquire, if financially feasible, and as a last measure, convert unoccupied, Caltrans-owned properties, that are not sold at fair market value to deed-restricted affordable housing units to expand housing mobility opportunities for lower-income households and revitalize underused areas, so long as the neighborhoods of the remaining Caltrans properties are not overly represented. Expanding housing mobility opportunities shall be shared equally and distributed throughout the City.

The statement in the right column at the bottom states: "Units will be available to occupants by October 2024." Seems to be overly optimistic. Recommend deleting it or saying X months after work has been completed that the units will be fit for occupation. You have no control over construction/rehab contractors, supply distribution systems, and actual materials. Delays are unfortunately part of our new normal post pandemic. Why box yourself in a corner with HCD by setting an unrealistic and really naïve date?

Thanks again for allowing input by the public in this manner.

Sincerely,

Delaine W. Shane
2003 Meridian Avenue

- **How addressed:** The City Council has made no determination regarding the purchase of the surplus Caltrans property or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Furthermore, selling all of the surplus Caltrans homes at market rates to generate capital for the creation of deed-restricted affordable housing elsewhere in the city is not an allowable action under SB 381. Staff will explore possible solutions.

Ed Elsner (March 9, 2023)
Dear Director Frausto-Lupo,

Avoiding displacement of existing residential tenants should be a higher priority in the City's housing element.

The 5th draft housing element proposes to include Huntington Drive as part of the Downtown Specific Plan, change the zoning of medium and high density residential parcels to mixed-use, and increase density to 70 du/ac -- a higher increase than the 30 du/ac and 45 du/ac proposed for medium and high density residential zones elsewhere in the City.

This proposed rezoning of Huntington Drive would promote displacement of existing tenants residing in multi-unit apartment buildings along Huntington Drive, and while the housing element's proposed tenant protections may help mitigate the displacement, as a practical matter the displacement will be permanent.

Displacement most acutely affects families with children (who may have to be pulled out of school mid-year), the elderly, and the disabled, and the impacts can be devastating.

In my experience representing residential tenants in eviction cases off and on for 30 years, the "right of return" is illusory in most cases.

This is primarily because two moves are required. While the landlord would be required to pay relocation assistance to the tenant on the way out, the right of return typically does not include a requirement for the owner to pay moving expenses for the return move. The right of return depends on the landlord giving the displaced tenant a written offer, and the tenant typically has a limited period of time (typically, 30 days) to accept the offer. The mailed notice may or may not be received, whether because of problems with mail delivery, a property owner who is a bad actor who does not follow the notification rules, a tenant who has moved and neglected to provide a forwarding address, etc.

If the notice is received, it may come years after the tenant was evicted. The tenant may have moved out of the area and established roots in another community, the tenant may not be able to afford the return move, the tenant may be in the middle of a fixed term lease that the tenant cannot break, etc. A successful tenant must be vigilant in monitoring the construction process and may have to hire an attorney to enforce their rights. But most importantly, the tenant's personal situation must be flexible enough that the tenant can make a quick decision at some uncertain time in the future to make the return move, and the tenant must have the financial resources to do so.

A 2018 Los Angeles Times article illustrates the practical reality of the right of return in a City with a well-funded, fully staffed housing department.

The 5th draft housing element also appears to understate the number of existing units on Huntington Drive that would be affected by redevelopment.

To take a random example, parcel 5319037001 (1170 Huntington Drive) is identified in the draft housing element as high density residential parcel with 0 existing units. However, this is actually a 20-unit apartment building. There are many other examples of parcels identified in the draft as medium or high density residential parcels having 0 or 1 existing units when the parcels actually have multi-unit apartment buildings.

Rezoning of medium and high density residential parcels on Huntington Drive should be the same as for medium and high density residential parcels elsewhere in the City.

The "missing middle housing" program in the pre-March 7th draft had good potential to increase housing production while minimizing displacement of existing residential tenants. This is because eligible properties would be single-family parcels occupied in most cases by the property owner, who would be making a voluntary decision to participate or to sell the property to a developer and relocate.

However, the March 7th update may have effectively gutted the program. Before the March 7th update, the missing middle housing program would have applied citywide in all residential zones except high fire hazard areas, and there was a commitment to implement the provisions of SB 10. In the latest update, only parcels in "low-density residential zones along high quality transit corridors and/or transit stops" (and not in a high fire hazard area) would be eligible, and the scope of the program is yet to be determined "by the community, Planning Commission, and City Council."

It is unclear which low-density residential zones would be considered to be "along" the City's high quality transit corridors, identified in SCAG's Data/Map Book as Fair Oaks Avenue and Huntington Drive east of Fair Oaks, as there is no low-density residential zoning actually on either street, and the March 7th update does not identify parcels or zones that would potentially be eligible (subject to a future scope determination).

The housing element should include a more robust missing middle housing program.

Thank you for your consideration,

Ed Elsner
edelsner44@gmail.com

- **How addressed:** Goal 6 and the policies within that goal will be developed after further research to mitigate the potential for and impacts of displacement. The number of existing units was pulled from building permit data. The data was spot checked, but may be incomplete for some parcels.

Ed Elsner (March 9, 2023)

Dear Director Frausto-Lupo,

I'm writing to describe a possible alternative to program 2.n. in the 5th draft housing element (as updated on March 7, 2023), the Citywide Height Limit Ballot Initiative. The alternative would be a general plan amendment modifying the forty-five foot height limit established by local initiative in 1983.

This general plan amendment could be implemented on the same 120-day timeline as the housing element's other rezoning programs (which include other amendments to the land use element of the general plan), and with more certainty than the proposed 2024 ballot measure.

Recognizing that this alternative program may not be viable politically, I'm hoping this comment at least provides additional perspective that may be useful as the City works towards achieving its housing element goals.

The General Plan and the Land Use Hierarchy

The state Planning and Zoning Law establishes the authority of local governments to regulate the use of land. Gov't Code § 65000 et seq.; Neighborhood Action Group v. County of Calaveras (1984) 156 Cal.App.3d 1176, 1182. Each city must adopt a general plan for the physical development of the city. Gov't Code § 65300. The general plan takes precedence over other local zoning laws:

> The general plan is atop the hierarchy of local government law regulating land use. It has been aptly analogized to "a constitution for all future developments." [Citation omitted.]...Subordinate to the general plan are zoning laws, which regulate the geographic allocation and allowed uses of land. Zoning laws must conform to the adopted general plan. [Citations omitted.] These enactments provide the authority and the criteria for the regulation of land uses.

Neighborhood Action Group, 156 Cal.App.3d at 1183; Gov't Code § 65850 (authorizing cities to adopt zoning ordinances).

Local Initiatives and General Plans

Although a city's general plan may be amended by local initiative (DeVita v. County of Napa (1995) 9 Cal.4th 763), the electorate must have adequate notice of the purpose of the initiative:

> We cannot at once accept the function of a general plan as a "constitution," or perhaps more accurately a charter for future development, and the proposition that it can be amended without notice to the electorate that such amendment is the purpose of an initiative. Implied amendments or repeals are disfavored in any case [citation omitted], and the doctrine may not be applied here.

Lesher Communications, Inc. v. City of Walnut Creek (1990) 52 Cal.3d 531, 540-541. "Since we cannot presume the existence of such intent [to amend the general plan], it must be found, if it exists, in the ballot measure itself or the explanatory material in the ballot pamphlet." Id. at 542. Stated another way, in order to amend the general plan, the text of the local initiative or the explanatory ballot materials must provide notice that the measure is something "other than an ordinance in the nature of a zoning ordinance." Id. at 544.

The 1983 Height Limit Initiative

In a 1983 special election, South Pasadena residents voted to approve a local initiative establishing a citywide height limit of forty-five feet (Reso. 5642):

The initiative did not identify a provision of the general plan that it would amend, nor did it state that it was adding to the general plan; therefore, absent some other basis in the ballot materials to conclude that its purpose was to amend the general plan, the 1983 initiative has the status of a zoning law subordinate to the general plan in the land use hierarchy. Lesher Communications, 52 Cal.3d at 541.

Amending the General Plan to Modify the Height Limit

Section 9217 of the Election Code generally provides that local initiatives may not be amended or repealed except by a vote of the people, and program 2.n. assumes that the City's forty-five foot height limit cannot be modified without voter approval.

However, if the 1983 initiative is subordinate to the general plan, section 9217 would not restrict the City Council's authority to amend the general plan to modify the height limit, and once amended, the general plan would prevail over the inconsistent subordinate law:

> The Planning and Zoning Law itself precludes consideration of a zoning ordinance which conflicts with a general plan as a pro tanto repeal or implied amendment of the general plan. The general plan stands....The Planning and Zoning Law does not contemplate that general plans will be amended to conform to zoning ordinances. The tail does not wag the dog. The general plan is the charter to which the ordinance must conform.

Lesher Communications, 52 Cal.3d at 541.

For similar reasons, the 1983 initiative cannot be interpreted as superordinate to the general plan. The local electorate's right to initiative is co-extensive with the legislative power of the local governing body (DeVita, 9 Cal.4th at 775), so if the City Council cannot enact a land use law above the general plan in the land use hierarchy -- which it has no authority to do under the Planning and Zoning Law -- neither can the electorate via local initiative. Legislature v. Deukmejian (1983) 34 Cal.3d 658, 674-675 (initiative power is subject to the same limitations as legislative action).

The Housing Accountability Act provides additional support for the suggested general plan amendment. If a proposed housing development project is consistent with objective general plan standards and criteria, but the zoning for the project site is inconsistent with the general plan (for example, because a zoning ordinance includes a lower height limit), the project will be deemed "not inconsistent" with applicable zoning standards and criteria for purposes of approval of the project's land use application. Gov't Code § 65589.5(j)(4).

The 1983 initiative could have included clear language that it was amending the general plan, but as written, it left the door open for the City Council to modify the height limit through a superseding general plan amendment.

Noncompliance with the Housing Element Law

The City has been out of compliance with the housing element law since October 2021, and because it missed the October 2022 deadline to adopt a housing element and to obtain certification from HCD, the City will remain out of compliance until the City adopts a compliant housing element and completes the related rezoning programs.

Given recent media attention, there is more widespread awareness of the consequences of noncompliance with the housing element law, including the loss of authority to disapprove land use applications for housing projects that are inconsistent with the City's zoning laws, also known as the "builder's remedy." Gov't Code § 65589.5(d)(5). As a result, the electorate has a better understanding why South Pasadena needs to obtain housing element compliance sooner than later, and anyone following the progress of the City's housing element should understand how a modified height limit in designated higher-density zones is critical to achieving that goal while avoiding a radical upzoning of the the entire city.

Thank you for your consideration,

Ed Elsner

edelsner44@gmail.com

- **How addressed:** The Housing Element proposes a program to amend the zoning code height limit which was adopted by the voters. Any ordinance enacted by the voters may only be amended by the voters. The Housing Element establishes a program to put this question to the voters to decide whether to establish a new height limit to achieve the densities required to meeting the RHNA housing goals. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review. Per a Court Judgement, the City must place a measure on the ballot to repeal or amend the current height limit.

Julie Pearson (March 9, 2023)
To our city staff,

As a resident of the city for 25 years, married to a resident of over 50 years, who is the child of a resident of nearly 60 years, we oppose the city's intention to remove all single-family zoning requirements, city wide. We also oppose the city's intention to allow structures in the city to rise more than 6 stories.
These proposed changes in our opinion would change the feel of our town as well as the neighborhoods, and be detrimental to the family friendly environment that is central to our city.

Thank you for considering my comments.

Sincerely,
Julie Pearson, Keith Pearson and Margie Pearson
1749 Via del Rey

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements. The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023.

Bill Kelly (March 9, 2023)
Public Comment on Second Draft of Draft 5 (March 7, 2023) of South Pasadena's Housing Element
(Submitted March 9, 2023)

Greetings:

Thank you for the opportunity to comment on the second draft (March 7, 2023) of the fifth draft (March 2, 2023) of South Pasadena's proposed Housing Element 🤓 in my hopes that it will result in a third draft of the fifth draft.

The comments below first cover general concerns with the latest draft. The second part covers various concerns reflected in previously published and verbalized community comments regarding state housing requirements, as well as an email sent by a resident to unspecified individuals aimed at

prompting comments and complaints to City management and Councilmembers, which you have no doubt received.

Specifically, I urge you to:

- End R-1 zoning throughout the city (except in areas with wildfire and geologic hazards); and

- Get started with affordable housing by committing in the City's housing element to seeing that denser affordable housing is built on as many of the unoccupied Caltrans properties as possible. (The well documented need for affordable housing amid the widely discussed housing crisis need not be amplified here. It is a well-established feature of the landscape.)

In submitting the next draft of the Housing Element to the state, foremost please remember that zoning does not build housing, only investment does, and the vacant Caltrans properties at this point represent the only palpable prospect the City can increase its stock of desperately needed affordable housing in the next few years. Moreover, change will not come overnight with rezoning. Change will come only over a decade or more. Indeed, many of us who are debating housing will be dead and gone before any appreciable change.

General Concerns

First of all, South Pasadena is not alone among cities that to date have failed to see their housing elements approved. It is clear that cities are dealing with relatively recently passed laws and emotional divisiveness among their residents as change rarely is easily accepted. Nowhere, perhaps, is that more true than in South Pasadena, one of the few communities across the nation that stopped the extension of a freeway. That said, much of the traffic the freeway would have conveyed now travels on city streets, including Fair Oaks and Fremont that are regularly gridlocked. Meanwhile, polluting diesel trucks hauling containers from the region's ports don't pass through South Pasadena to reach logistical centers on the periphery of the region, but instead travel along the 60 and I-10 freeways through less affluent communities, many of which are predominantly of color. At the same time, the City has been essentially unable to agree and carry out any significant effort to use available funds for traffic calming, active transportation facilities, and surface street projects, as other cities move forward.

When it comes to housing, some City residents have fought any efforts or plans to allow for increased density, instead seeking to shoehorn density into narrowly prescribed strips along commercial streets and major arterials. In addition, the city's planning and permitting process is lengthy and tedious. As a result, there has been relatively little change in the landscape in the more than thirty years I've lived here. Indeed, residents—including freeway fighters, historical preservationists, and many prosperous owners of large single family homes on large parcels, aided by others prone to fear of change—have managed to keep South Pasadena more or less the way it has been since the post-World War II era, a quaint bedroom community that celebrates the days of Route 66, classic cars, good schools, and beautiful gardens, a community that many residents view as charitable and charming. And no doubt all these things contribute to South Pasadena's much locally celebrated and revered "neighborhood character."

Personally, I must admit that I was drawn to the community upon returning to Southern California in 1988 due to its neighborhood character. However, a lot has happened since then and as I've witnessed the changes—hollowing out of the middle class, offshoring of manufacturing, stagnation of wages, growing inequity, increasing social and racial tension, rampant drug addiction and social

dysfunction, growing homelessness, overcrowding, housing insecurity, a wave of mental illness, and the astronomical cost of housing, and rapidly accelerating climate instability—my view of what it means to live here in South Pasadena, in the region, and in the world has changed dramatically. Today, it's become increasingly apparent that the magnitude of change needed to address this complex of interrelated problems has become so great that over the next ten to 20 years just about everything around us must change, including here in South Pasadena. However, this view is assuredly not shared by apparently influential residents who say they support "thoughtful and conscious growth and expanded thinking" as long as it's not next door. They complain about any proposal to add much needed housing, grasping at any potential plausible objection, such as lack of water, lack of power, traffic, burdens on schools and services, lack of open space, ***and mostly the perception that growth will diminish their property values***. They dispose of anything that's seemingly proposed, yet never articulate on their own what a housing element, or general plan should include. And history has shown their tendency is to get the city to legally contest many state requirements aimed at solving these problems, and then slow roll any local actions developed to meet the requirements once legal actions play out. This pattern clearly is based on the view that South Pasadena is exceptional and should be left to manage its own affairs without regional and state oversight. Yet, this is despite that the source of the wealth here stems from proximity to the second largest metro area in the nation situated on the rim of trans-Pacific trade and in the heart of a state with one of the world's biggest economies. ***Indeed, the message seems to be: I'll enjoy the personal wealth the region offers, but don't ask me to contribute much toward solving the region's problems. Moreover, don't call us irresponsible, because we supported local tax measures and contribute to local charities that are "truly . . . sustaining our way of life here in SoPas." In this case sustaining is a substitute for "not changing."***

However, as city officials and Councilmembers it is incumbent on you to lead, rather than to cater to such provincialism. Just imagine that the story is much the same in small cities across the region and the state when it comes to the state's housing requirements. Note too that such attitudes have prevailed for decades, while problems have mounted and festered. Indeed, it's the lack of any local effort to address the housing crisis that led lawmakers in Sacramento to enact new state requirements. So now, it's reckoning time. Unless we look in the mirror as a community and make the change, the problems that everyone seems to acknowledge and agree must be solved, won't be solved by doing the same as we have done in the past.

Addressing Specific Contentions Voiced in the Community

City-wide R-4 zoning will diminish property values

Don't tread on me and my property value by continuing to maintain R-1 zoning. Numerous studies cited below show that increasing density, particularly everywhere, will result in rising property values and likely check rising rents and housing costs. In addition, the city's inclusionary housing ordinance will require more affordable units.

https://masslandlords.net/gentle-density-increases-nearby-property-values-evidence-shows-contrary-to-popular-belief/

https://www.strongtowns.org/journal/2022/1/18/what-would-mass-upzoning-actually-do-to-property-values

https://voiceofoc.org/2021/08/jamieson-increasing-densities-in-single-family-neighborhoods-would-increase-land-values-make-housing-more-expensive/

https://voiceofoc.org/2021/08/jamieson-increasing-densities-in-single-family-neighborhoods-would-increase-land-values-make-housing-more-expensive/

Also, increasing allowable density city-wide will open better housing opportunities to all and destigmatize affordable housing residents. It will address the baked in ongoing classism in the City and its racist legacy during the Sundown Town era.

We don't have the water or power to add additional housing units

Housing not lawns is the rejoinder. Indeed, half or more of the water is used outside to water lawns. If the lawns had housing on them, water use would not increase. Indeed, more than half the people dwelling in multi-unit housing in South Pasadena use only half the water used by the less than half that live in single family homes. That's because half the water use at the average-sized single family residence is used to water lawns.

Table 4-1 Demands for Potable and Non-Potable Water - Actual

Submittal Table 4-1 Retail: Demands for Potable and Non-Potable[1] Water - Actual			
Use Type	2020 Actual		
Drop down list May select each use multiple times These are the only Use Types that will be recognized by the WUEdata online submittal tool	Additional Description (as needed)	Level of Treatment When Delivered Drop down list	Volume[2]
Add additional rows as needed			
Single Family		Drinking Water	1,962
Multi-Family		Drinking Water	992
Commercial		Drinking Water	450
Institutional/Governmental		Drinking Water	85
Landscape		Drinking Water	4
Losses		Drinking Water	46
Other	Fire Protection	Drinking Water	7
		TOTAL	3,546
[1] *Recycled water demands are NOT reported in this table. Recycled water demands are reported in Table 6-4.* [2] *Units of measure (AF, CCF, MG) must remain consistent throughout the UWMP as reported in Table 2-3.*			
NOTES:			

From: https://www.southpasadenaca.gov/home/showpublisheddocument/27639/637738897658270000

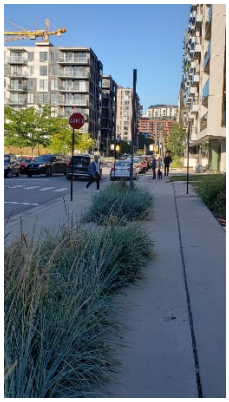
In fact, one study shows that on R-1 lots in the area, as much as 70 percent of water use is for lawn irrigation.

https://deeply.thenewhumanitarian.org/water/community/2017/08/09/city-wide-study-shows-how-much-water-urban-landscaping-really-uses

Lack of Power

California utilities are in the midst of major distribution circuit upgrades to increase capacity to deliver power. The California Public Utilities Commission and California Independent System Operator require utilities to show they have enough power for each coming year by performing a "resource adequacy study." To pass the test, the utilities must show they have adequate power purchase contracts for a one-in-ten-year weather event. Utilities also are subject to long-term transmission planning requirements, as well as power procurement requirements.

Overwhelming Transportation Infrastructure



Look Ma, no traffic. A Montreal residential neighborhood at rush hour in fall of 2022.

Contrary and seemingly counterintuitively, density does not necessarily result in increased traffic. Instead, low density single-family development increases traffic. Montreal is a case in point. The four million who live within the city limits there get around by walking, biking, and riding the clean, well maintained, and extensive subway system. Retail, including supermarkets, drug stores, etc. are scattered throughout the city. This has enabled Montreal to minimize the space it allocates for the auto compared to the typical U.S. city, particularly in suburban areas. That has opened up public spaces, which are distributed throughout the city.

Indeed, a new study conducted at U.C. Davis recently showed that increased density will help meet greenhouse gas and other air pollution reduction goals by minimizing the need to drive, even in electric cars. This will help reduce dependence on foreign metal mining for batteries, magnets, etc. used in electric vehicles.

https://www.theguardian.com/us-news/2023/jan/24/us-electric-vehicles-lithium-consequences-research

https://www.climateandcommunity.org/_files/ugd/d6378b_3b79520a747948618034a2b19b9481a0.pdf

Impact on Schools & Open Space

Schools have the ability to expand by building up. Schools also can cooperate with the City to close streets to expand playgrounds and athletic fields. In fact, SPUSD did this when South Pasadena Middle School was rebuilt more than 15 years ago. Moreover, even South Pasadena freeway fighters who support maintaining R-1 zoning have touted closing the 1-710 stubs in Los Angeles and Pasadena, respectively, to expand the Cal State Los Angeles campus and to create new park space in Pasadena. Why not expand elementary school campuses by closing or narrowing adjacent streets where possible.

In addition, areas in Garfield Park under the SCE lines and also areas around the periphery of the fields in the Arroyo could be used to site local basketball courts, etc., or additional community gardens. They are not well maintained and are under-utilized. At one point the updated general plan, which still is pending years later, contemplated placing a walking trail under the SCE lines paralleling Fair Oaks in the Marengo District. It hasn't been done or pursued as the general plan remains in limbo after years of discussion.

Conclusion

To conclude, we are only limited due to our limited way of viewing the world, despite that those voicing opposition to density claim they back expansive thinking. By increasing allowable density citywide and by beginning with seeing that quads, triplexes, etc. are built on the vacant Caltrans lots where feasible, South Pasadena can begin to address the complex of interrelated problems that we all want to solve. However, if South Pasadena and hundreds of other cities continue to do what they have in the past, the problems will continue to grow and make life—with its traffic, pollution and climate change, homelessness, and social inequity—worse and worse. We can either be part of the solution or part of the problem. That's why we must look ourselves in the mirror and decide to truly bring about the change that is so clearly is needed and so long forestalled.

Bill Kelly
South Pasadena Resident

- **How addressed:** The City Council has made no determination regarding the purchase of the surplus Caltrans property or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Staff will explore possible solutions. The remainder of the comment does not include any proposed changes to the Housing Element, but supports many of the policies already contained in the Element.

Jeremy D (March 6, 2023)
I would request the city change the following section of the housing element to limit the area that would allow up to a four-plex to parcels on major traffic corridors only, like Huntington, Fremont and Fair Oaks or near the Metro station. Also, since the city currently has a height limit, I would recommend removing the mention of buildings that are above the current limit until the time when the voters have had a chance to weigh in on this.

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Additionally, the City will permit "Missing Middle" housing types in all residential zones citywide, except for in high fire hazard areas. Missing Middle housing types shall include duplexes, triplexes, four-plexes, courtyard buildings, and cottage courts. The City will adopt objective design standards for each housing type.

- **How addressed:** The Housing Element was revised to reduce the area where missing middle housing will be allowed from citywide to the high-quality transit areas within the city. This revision was released for public review on March 7, 2023. Program 2.n does not change the height limit, it commits the City Council to bring forth a voter initiative to consider repealing or replacing the height limit and provides a new height limit if it is replaced. The Housing Element establishes a program for the voters to decide whether to establish a new height limit to achieve the densities required to meeting

the RHNA housing goals. Pursuant to the Court order in the existing litigation regarding failure to adopt a compliant Housing Element by the statutory deadline, the City is required to place a measure on the ballot to revise the height limit for residential uses. If the voters do not increase the height limit in certain areas, other zoning-based measures (such as conversion of current low density areas into higher density areas) will need to be analyzed and submitted to HCD for review.

Josh Albrektson (March 11, 2023)
This e-mail is CCed to City Council. SoPas planning Staff, and HCD. This is meant mostly for HCD.

There are two major problems with the 4th draft South Pasadena Housing Element. At first I thought they were mistakes but after my conversation with SoPas staff on Wednesday I realized they were intentionally done.

South Pasadena's housing element should not be accepted without these being changed, and it is my hope that South Pasadena changes them before the Housing Element is submitted on Monday. I told them they needed to fix it at our Wednesday meeting and in a subsequent e-mail.

1. The city is using intentionally low FAR to ghost zone the 70 DU/Acre and 110 DU/Acre and make them not feasible.
The March 2nd draft had FARs of 7.0 and 10.0 respectively. They released a new draft on March 7th that changed it to 2.5 FAR. That 2.5 FAR makes 70 and 110 impossible to build and staff knows this.

815 Fremont Ave is a 50 unit density bonus project approved by South Pasadena in April 2022. It has a FAR of 3.3, a density of 61.7 DU/Acre, and a height of 56 feet.

This is a real world example of the FAR needed to build in South Pasadena. Based on this approved project, the FAR for 70 DU/acre should be at least 3.75 and for 6.0 FAR for 110 DU/Acre.

The 2.5 FAR makes both of these densities impossible and the Housing Element needs to be changed to at least the numbers I listed above.

I raised this issue with SoPas staff at my 3/9 meeting, and I found out this was intentionally done.

When I told Allison Becker (AB) that the 2.5 FAR made 70 and 110 infeasible, she told me that General plans, specific plans, and housing elements need to be internally consistent and they changed it to 2.5 FAR because that is what was in the 2020 proposed Downtown Specific Plan (DSP).

I told her that was BS, because the Housing Element was going to have densities of 70 and 110, and if you actually wanted the documents to be internally consistent than the FARS needed to be changed because the 70 and 110 are going to be in the Housing Element and the FAR should be changed to be consistent with the required density.

She then changed her response to say that the community didn't support over 2.5. AB stated 2.5 FAR is what the community agreed to in the DSP in 2020.

AB and Grant Henninger (GH) then stated that the 2.5 FAR is there because of the 45 foot height limit and when the community votes to raise the height limit there will then be a discussion at that time with the community as to what the appropriate FAR should be.

Of note, I have an e-mail from Woody Tescher of Placeworks who wrote our 2020 DSP. The reason he said 2.5 FAR was picked was because that is the biggest building that could be built with 50 DU/Acre and 45 ft height limit. If that is the biggest that can be built under those conditions, then 2.5 FAR is absolutely inadequate for 70 Du/acre and 110 DU/acre at 84 feet.

This kind of ghost zoning is just as bad as their repeated claims that 70 DU/Acre was feasible under the 45 foot height limit and the Housing Element should be changed so that the FAR allows the density stated in the Housing Element to be built. It should be 4.0 for 70 DU/Acre and 6.0 for 110 DU/Acre.

2. SoPas is intentionally setting the zoning for site 3, Pavilions, significantly under what the owner's representative stated was needed for financial viability.

At the Feb first City Council meeting SoPas asked the owner of Pavilions to give a public comment stating that they wanted to redevelop the property and was not concerned about parking during construction. Mr Anderson, the owners lawyer, went much further than that.

Here is the link to the video. Starting at 2:07:30 he gave a 3 minute public comment and then at 2:12:08 he was called back to answer a question from Council Member Braun until 2:14:00. I really encourage you to listen to everything he said.

http://www.spectrumstream.com/streaming/south_pasadena/2023_02_01.cfm

He said he was asked to sign a letter stating intent to redevelop and he did. He also said that he REPEATEDLY told SoPas staff that the zoning proposed in previous housing elements were not financially viable.

He said that the only way they would redevelop the property with housing is if they could replace the grocery store with a bigger grocery store and they were very interested in that.

He also stated that they needed 150-160 DU/acre for the zoning and 140 DU/acre was the absolute minimum needed for financial viability. He also said they could do it at 84 ft.

South Pasadena is zoning this lot for 110 DU/Acre and this is intentionally below what Mr. Anderson said was needed to be viable.

In the March 2nd draft the zoning was 10.0 FAR, 110 feet. and 110 DU/Acre. In the March 7th draft they changed it to 2.5 FAR, 84 feet, and 110 DU/acre.

In my meeting with SoPas Staff I told them that with the changes they were now zoned for less than the very specific requirements Mr. Anderson stated.

AB told me that they had removed Pavilions, like I asked them to. I said no you didn't. It is still there. AB said well they planned to. GH interrupted her and said that they should have this conversation offline.

It appears that there had been discussions in SoPas staff to remove site 3 with the zoning proposed.

AB then asked me "Well, don't you think that this was just an ambitious proposal from the owner used as a negotiating tactic??"

The goal of a Housing Element and SoPas staff should be to actually have the housing be built. It should not be a negotiation with the owner to make the feasibility of a project so low with the least amount of apartments so that the project may or may not be built. This site is one of the best sites to build housing in all of SoPas and SoPas should be doing whatever is possible to put the most possible units on this site.

Instead they are intentionally making sure the zoning would not allow redevelopment.

This Housing Element should be rejected unless South Pasadena zones this site for 160 DU/acre as Mr. Anderson specifically stated was required.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** There is no intent by the City to make sure zoning standards do not achieve stated Housing Element goals. The City is committed to taking such actions within the required 120 days post-adoption to amend zoning and other codes to address the goals of the Housing Element.
- **How addressed:** The stated FAR and other development standards outlined in Program 3.b of the Housing Element are consistent with the current height limit. When adopted, within 120 days after adoption of the Housing Element, the General Plan, Downtown Specific Plan, and other zoning amendments will need to be consistent with the current height limit. If the height limit is repealed or increased through voter initiative, development standards for affected zones with residential uses will be updated to be consistent with the new height limit within 120 days thereafter.
- **How addressed:** This draft of the Housing Element represents a significant increase in the density allowed on Site 15, from 70 to 110 du/ac. At the February 1st City Council meeting, the representative of this site indicated that they analyzed the site's feasibility using the existing inclusionary requirement of 20%, as well as a higher requirement of 30%, and under those requirements would need at least 140 du/ac to make redevelopment of the site be feasible. The City is reducing the inclusionary requirement to 15% and providing significantly more incentives and reduced development standard requirements to ensure that redevelopment of sites like this one are feasible. Furthermore, this site is not necessary for the City to meet its RHNA numbers, and instead the site only adds to the City's RHNA buffer.

Mike Thurman (March 12, 2023)
Hi Michael!

I wanted to reach out and share my thoughts on a win-win approach to meeting the State's housing element requirements. I looked over the City's draft proposal and was surprised at the low estimate for ADU conversions (50 over the next eight years) in meeting the 2,067 additional unit requirement.

I believe that our city has hundreds of unpermitted ADU units that are currently fully occupied by low-income residents that are not being counted because of their status. Issuing permits for these fully-occupied units would immediately:

1. Lift the City's count of the number of low-income residents that currently live in these units.
2. Increase homeowner property values by increasing the habitable square footage of their properties.
3. Allow homeowners to fully insure their properties for the full replacement value of their properties, including the ADU units.
4. Avoid any new construction and associated impacts for these additional units.
5. Avoid any new parking impacts for these existing units where residents are already housed.

City leadership may be under the impression that the City's previous efforts to encourage ADU conversions generated only limited results, and therefore this might not a viable option for generating significant additional low income units. However, that impression is incorrect.

Based on my own experience, although City staff prepared a brochure and encouraged residents to apply for ADU conversions, suggesting these would involve low-cost and low-documentation reviews, in fact once the Building Department became involved it immediately become apparent that the costs associated with the conversion, including completion of a complicated application and architectural and structural engineering plan requirements, would be prohibitive, and my hunch is that the City received very few applications from that effort.

However, it is important to appreciate the fact that all of these unpermitted units in South Pasadena are already occupied, meaning that this prohibitive ADU conversion process has simply prevented existing units from being permitted and has guaranteed that they remain uncounted.

Another unfortunate reality is it appears from the Report that the City has no accurate count of the number of these units in the City. I firmly believe there are at least a dozen of these units located in just my neighborhood, one street within the City. My sense is this could, and should, be a much more significant element in the City's plans for complying with the State requirements.

I believe our City could make a significant dent in meeting the State's additional housing requirements, and at the same time support many of our homeowners, by carefully examining the ADU conversion process, simplifying it and providing additional resident support in the process. I can foresee (and will volunteer to lead or be part of) a citizen-led promotion of such a program to encourage and maximize ADU conversion application submissions by South Pasadena residents who own these units.

Thank you for considering these thoughts and for your continued service to our City. Please feel free to contact me with any questions or feedback on this issue.

Best wishes to you and your family,

Mike Thurman
(626) 399-6205 (cell)
michael@thurmanlegal.com

- **How addressed:** The Housing Element includes a significant discussion of the City's existing ADUs, as well as projected ADUs accounting for a portion of the City's RHNA requirements. Additionally, the Housing Element includes programs to encourage and monitor the construction of ADUs to ensure that ADU production meets the projections throughout the planning cycle.

Care First South Pasadena (March 12, 2023)
City of South Pasadena
Community Development Department
afraustolupo@southpasadenaca.gov
grant@mobius-planning.com

CC: California Housing and Community Development
Paul.McDougall@hcd.ca.gov
Connor.finney@hcd.ca.gov

Re: South Pasadena Housing Element, Fifth Draft (March 7)

Dear Ms. Frausto-Lupo:

We are dismayed by the City of South Pasadena's unilateral revisions of the Fifth Housing Element draft between March 2 and March 7. These changes set back progress on the development of the 20 vacant Caltrans properties. The City is no longer committing to converting these properties to affordable housing on site and, instead, is returning to entertaining "alternative solutions" to Senate Bill 381.

The Caltrans properties are the only certain parcels of land for the development of 100% affordable housing in the foreseeable future in South Pasadena. Other programs and sites identified in the Housing Element are only ideas for potential developments. Similarly, zoning, building, and other code changes will not guarantee affordable housing development, functioning only to support and incentivize prospective projects.

The City's March 7 revisions to the Caltrans properties continue the City's decades-long history of racial and economic exclusion and do not affirmatively further fair housing.

It comes as no surprise that both the March 2 and March 7 drafts also fail to address our comments about the City's use of historic preservation policies. The City will continue to use these policies to impede affordable housing development and maintain much of its racial and economic exclusion in higher resource neighborhoods. And, the City has no plans to stop doing so.

Worse, not only is the City attempting to skirt existing laws on fair housing and Caltrans properties, but the City has also eluded the public participation process required for the Housing Element. Nothing in the March 7 version explains why the City made significant revisions from the March 2 version. Prior to March 2, the City held three public meetings on February 1, 9, and 15 to receive public comment and to direct City staff on how to revise the Housing Element. The March 2 version reflected these discussions. We can reasonably surmise that between March 2 and March 7, the City received comments from residents and Councilmembers and changed the draft accordingly, outside of the public process. The City must disclose in this draft, with opportunity for public comment, all communications it received pertaining to the fifth Housing Element draft.

Program 1.b. – Convert Caltrans Homes to Affordable Housing

Constructing affordable units on the Caltrans sites is critical to bringing in any new affordable units in the City because there are no other sites in the City that are already obligated to hold 100% affordable housing. While the City committed to converting Caltrans homes to affordable housing on site in the

March 2 version of the Housing Element draft, it completely changed course on March 7. **The City should adopt the March 2 version of this program.**

In the **March 2 version**, the City wrote:

> [T]he City *will* construct additional units, either as ADUs or Missing Middle housing, on *the parcels* to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.

Redline Version, p. 266 (emphasis added).

> In the **March 7 version**, the City added a new provision about alternatives to Senate Bill 381, and walked back its commitment to construct additional units on the sites of the Caltrans properties:
> To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any *alternative solutions to those provided by SB 381* that respond to the cost constraints of particular properties.
>
> . . .
>
> [T]he City *may consider* the construction of additional units, either as ADUs or Missing Middle housing, on *certain* parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City's RHNA calculation, and will provide an additional buffer if constructed.

Redline Version, p. 267 (emphases added).

Senate Bill 381 is not just one option for the disposition of the Caltrans homes. It is the only option because it is the law that governs what the City must do upon acquiring the homes from Caltrans.

In a March 8 meeting with Care First, City staff shared it is the City's intention to comply with the spirit of Senate Bill 381—to convert the properties into affordable housing—but also it would like to explore "alternative solutions" for certain properties. These are contradictory goals. The City identified exempt properties to include ones that have the main subject of community debate: those located in the City's higher resource neighborhoods. When we asked for the City's inspection reports and other documents they are relying on to determine the feasibility of development, the City declined to share this information.[9] The City fails to provide any evidence in this Housing Element to support its conclusions that some properties are not financially feasible for development.

As explained in our December 8, 2022, comment, the City has not disclosed legally viable "alternative solutions" to the public. Mayor Jon Primuth, alongside Cultural Heritage Commission Chair Mark Gallatin (who simultaneously sits on the board of the private non-profit organization, the South Pasadena Preservation Foundation), has publicly advocated for these solutions, despite the City Attorney's opinion that these alternatives are unlawful.[10] One such alternative is selling the Caltrans

[9] The City has approved contracts for inspection services. See Agenda Items 22 and 23, City Council Meeting, July 20, 2022, https://www.southpasadenaca.gov/home/showpublisheddocument/30038/637934174414530000.

[10] On November 2, 2022, then-Mayor Pro Tem Jon Primuth, as one of the two members of the SB 381 implementation committee, stated at a city council meeting: "There's a proposal that we look at an alternative to SB 381. We are exploring

properties through a double escrow process and selecting preferred homebuyers vetted by the Cultural Heritage Commission. Again, Senate Bill 381 does not allow for this or other alternatives. Moreover, the Cultural Heritage Commission, which has a mandate to enforce the City's historic preservation laws rooted in racial and economic exclusion, must not be allowed to participate in any homebuyer selection process.

If the City insists on continuing to explore "alternative solutions" to Senate Bill 381 in the Housing Element, it must explain what these alternatives are and why they are legally viable. Otherwise, the Department of Housing and Community Development should not approve this Housing Element which contains policy decisions that violate the law.

Program 3.m. – Implement SB 9 and SB 10

In the **March 2 version**, the City proposed to permit Missing Middle housing types "in all residential zones citywide, except in high fire hazard areas." The City did not specify the types of Missing Middle housing types for each category of residential costs, only that they could include duplexes, triplexes, four-plexes, courtyard buildings, and cottage courts.

In the **March 7 version**, the City narrowed the Missing Middle zones to "low density residential zones along high-quality transit corridors and/or transit stops, except for in high fire hazard areas." At this time, our position is neutral on these changes. However, we note several areas for improvement and change:

- Specify Missing Middle housing types to include triplexes and fourplexes. Without concrete commitments on density, the City risks falling short of its promises to allow for greater density

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that as one of our options as well." See http://www.spectrumstream.com/streaming/south_pasadena/2022_11_02.cfm# (starting at approximately 02:44:00).

Yet about two months prior, Primuth conceded in an email to local residents that these alternatives to SB 381 are not legally viable:

> The dilemma of what to do now under the requirements of SB381 is real. But there is a persistent talk that SB381 is optional. That's not my interpretation of the law. It's not our city attorney's interpretation of the law. It's the interpretation of the attorney designated by the SPPF [South Pasadena Preservation Foundation] proponents for the city to retain to obtain independent advise [sic]. All the public comment we will receive tonight is based on a false assumption, repeated against the overwhelming legal counsel they have received. I've spent hours exploring the option presented by SPPF in many public comments. I pointed out the problems and dead ends with their legal strategy. I've obtained a concession from a prominent SPPF member that their route requires bending the rules. There has been no concessions from the SPPF proponents. I am sorry to go on the record to criticize them, as they are fine, trustworthy friends and neighbors.

See Attachment 1 (November 2, 2022 email).

On December 7, 2022, Mark Gallatin made public comment at a city council meeting (starting at 1:04:00) sharing that the South Pasadena Preservation Foundation had "nominated the Caltrans homes in the historic 710 corridor . . . for inclusion on the 2023 list of America's 11 Most Endangered Places [maintained by the National Trust for Historic Preservation]." During the 710 freeway fight, designating South Pasadena as an endangered city was of "invaluable assistance" to keeping the freeway away. Gallatin continued in his comments: "We need nationwide attention again to return our historic neighborhoods to pre-Caltrans conditions and get the houses sold." Returning historic neighborhoods to pre-Caltrans conditions is code for maintaining their high income levels at the exclusion of lower income households and, as a result, disproportionately excluding Black and Latinx people. See http://www.spectrumstream.com/streaming/south_pasadena/2022_12_07.cfm.

in these targeted areas. For example, if the City only allows for duplexes, that will not be financially feasible for developers and will not result in greater density.

- Designate upzoning as the default policy (not an opt-in program). Staging this as an opt-in program creates another administrative hurdle in the development process rather than streamlining it; thus, this component of the program should be removed.
- Define "high fire hazard areas." The City leaves "high fire hazard areas" undefined in this draft. Based on the City Council and staff's public outreach discussions (e.g., Special Joint Meeting of the City Council and Planning Commission, February 15, 2023), the intent of this provision is to account for areas that have a high risk of fire. This provision should be narrowly interpreted and should not be used broadly to designate as many neighborhoods as possible as high fire hazard areas.

  The City currently defines the High Risk Fire Area as those properties located south of Monterey Road, extending to the city border, and west of Meridian Avenue, extending to the city border. This is broad and vague, with little empirical data to back these findings. The City lacks the specificity found in the surrounding municipalities (see https://egis.fire.ca.gov/FHSZ/) and should not use this means of determination. It would be more appropriate to examine these based on street width and availability of fire hydrants. Further, any measurable risk determination should shape the design methods used not prevent development. This blanket designation fails to acknowledge the many existing construction methods that can mitigate these risks.

- While the City is separated into zoned parcels (RE, AM, RS, RM, RH, MSSP), the City is not utilizing data that correlates household demographic information to these parcels. The City is using census tract data boundaries to define that demographic data. That is entirely inadequate, given that the city only intends to increase density along transit corridors.

  The parcels that currently contain the most demographic diversity will have their densities increased while the more homogenous regions will remain significantly lower – despite their proximity to available resources and their relatively flat topography. The largest, flattest, lots in the City are currently zoned RE – and the current draft of the Housing Element largely omits those lots from any future density development. Given the small area of the City, restricting density to transit corridors largely serves the purpose of keeping density contained where it currently exists.

- Allow lot subdivisions. Another inadequate method being proposed is the use of SB 9 lot splits to achieve greater density. To date there has not been a single SB 9 lot split approved in the City. Studies have shown that the legal requirements of SB9 splits make them prohibitive (see https://ternercenter.berkeley.edu/research-and-policy/sb-9-turns-one-applications/). South Pasadena relies on this inadequate method because there is not true intention to allow for more diverse development. The underlying principle in the city's programming is that current property owners can increase density via ADUs. But this does not provide equitable pathways to ownership and upwards mobility, it reinforces existing socioeconomic boundaries. A much more equitable means would be allowing lot subdivisions. The city's Housing Element has only allowed for lot consolidations along existing corridors.

<u>Goal 6.0 – Expand and strengthen tenant protections for South Pasadena's existing renters</u>
Program 6.a – Rent Registry

Program 6.b – Right to Return Policy
Program 6.c – Relocation Assistance
Program 6.d – Rent Stabilization

We are thrilled the City has included a comprehensive package of tenant protections in this draft of the Housing Element. The City's commitment to establish a rent registry sets itself up to monitor the rental market in South Pasadena and to effectively enforce these tenant protections. By establishing several new tenant rights—right to return, relocation assistance, and rent stabilization—the City will be actively preserving affordable housing and ensuring housing stability for thousands of South Pasadenans. While we applaud the City staff's efforts thus far to research, develop, and propose to City Council these policies, the draft should contain a firm date on implementation for each policy to ensure Councilmembers follow through with their commitments. The implementation date for all policies should be no later than the end of December 2023.

Thank you for considering our comments.

Sincerely,
Care First South Pasadena

- **How addressed:** The City Council has made no determination regarding the purchase of any of the surplus Caltrans properties or the specific use of the properties. The City is still analyzing the financial feasibility of purchasing the properties and the various options for converting them to affordable housing. The City cannot commit to a specific course of action for the surplus Caltrans properties until that analysis is complete. Staff will explore additional possible solutions.
- **How addressed:** The Housing Element does specify which types of missing middle housing will be allowed, including tri-plexes and four-plexes. As noted in the letter, the City does have a current definition of "high fire hazard areas."
- **How addressed:** The Housing Element includes significant areas of Very Low and Low Density Residential uses where missing middle housing will be allowed, all within ½ mile of high quality transit corridors along Fair Oaks Avenue and Huntington Drive.

Gail Maltun, et al (March 12, 2023)
Dear City Manager Chaparyan , Council Members and City Planning Staff,

We are writing to express our profound dissatisfaction with the 5th Draft of the Housing Element. While we understand that South Pasadena has been mandated by the State to provide more than 2,000 units of housing, we strongly believe that this can be achieved without the ill-conceived and draconian solutions proposed in this draft.

We are further distressed by the City's failure to present this Draft to the citizens of South Pasadena. The housing policies proposed in this document will drastically alter the architectural character of our City. Despite this, the Draft was released only to people who had previously signed up for updates on the Housing Element. That email went out on March 2, notifying us that comments on the more than 500-page document would be due in less than a week. The Neighborhood Pulse, distributed to the community by the City, included a cheery note about South Pasadena's 135th Birthday, but not a word about the Housing Element.

A few of our major objections are detailed below:

- The new height limit is dictated to be a minimum of 84 feet. We support a modest increase in height to allow for well-designed four and five story buildings, but 84-foot buildings—with 110 feet mentioned elsewhere--would drastically change the character of our town.
- In Program 3M, titled "Implement SB9 and SB10", you commit the City to participating in SB 10. This is a voluntary program that the City had previously vowed to opt-out of. SB 10, as you know, will allow massive upzoning (with CEQA exemptions) of much of the City—anything within ½ mile of the Gold Line Station and possibly within ½ mile of major bus stops as well.
- An "Affordable Housing Overlay"—otherwise known as rezoning—has been proposed in Program 2J/k. This overlay would allow "up to 30 units per acre" in "selected sites outside of the Downtown and Mixed-Use districts". Where this upzoning might land is completely unspecified: it might be on any street in town.
- The City commits to building "100% Low Income" units on several City-owned properties in the Downtown district. This is just terrible, outdated planning. Low-income units need to be incorporated into buildings that also include moderate and market rate units. To do otherwise is to stigmatize the residents of the low-income buildings and to create contemporary versions of the blighted "projects" of decades past.
- The "missing middle" units may sound great in concept, but what that means is eliminating single family zoning in a very large portion of the City. We believe most residents will find this objectionable.
- Perhaps our largest objection is the complete and intentional elimination of the more than 30 acres of City-owned land in the Arroyo from any consideration for development. The Arroyo Seco Golf Course and the Stables constitute, by far, the largest undeveloped land in the City. They could accommodate the development of many hundreds of housing units – and produce a huge financial windfall for the City in a potential joint venture with a developer. These properties are used by relatively few South Pasadena residents. Golf courses are water-guzzling facilities that are being redeveloped for housing throughout the State. The Stables are used primarily by upper-income horse owners, with stable prices ranging from $685-$785 per month, per horse. And the stables and golf course generate very little income for the city. Despite these properties being characterized in the report as open, natural space, neither are "natural space," and both are fenced off from the general public. Unlike the playing fields and park in the Arroyo, neither the Stables nor the Golf Course should be considered sacrosanct. The Arroyo, both in South Pasadena and in the City of Los Angeles, already contains both single-family and multifamily housing. In the course of public meetings, both the stables and the golf course were proposed for housing sites. If we have to choose between putting housing on these two sites and eliminating single-family residential zoning in most of our city and allowing □-10 story buildings, we believe the wiser choice is clearly to develop the stables and golf course properties. That the City excluded these two properties from our planning for housing at a time when the State is demanding more than 2,000 new units in our community demonstrates a level of ineptness and lack of imagination that borders on malpractice.
- We also object to the general tone of self-flagellation that permeates the document. The inclusion of the excerpt from "When South Pasadena was a Sundown Town", by Jerry Friedman (P. 104), and the heavy emphasis on our 70-year-old "Sundowner" past, in Section 6.4.6, "South Pasadena History," is a biased, one-dimensional view of our City. It ignores the fact that we long ago evolved into one of the most racially, ethnically and economically diverse

> cities in the area. Moreover, it is irrelevant to the task that the State has asked us to execute: namely, locate sites for 2,000 housing units: nothing more, nothing less.

It will be difficult to incorporate more than 2,000 new housing units in South Pasadena in the next few years. No one thinks this task will be easy. But we believe that it is possible to do this without destroying the architectural character of South Pasadena. By adding the Golf Course and the Stables to the sites available for development; by concentrating larger multifamily complexes that combine lower/moderate/market units on major streets such as Huntington and Fair Oaks, the Ostrich Farm area, and the Gold Line Station area; and by a modest increase in height limits to allow well designed four and five story buildings in selected sites—we think that we can achieve a successful Housing Element that will spark a more vibrant downtown while preserving our peaceful streets and small town character.

Sincerely,

Gail Maltun
Alan Maltun
Niles A. Pierce
Gillian Pierce
Diemha Hoang
Kathy Eastwood
Michael Eastwood
Shelley Stephens
Valerie Greco
Nicolas Greco
Nichole Dunville
Mary Farley
Christina Schwarz
Benjamin Schwarz
Eileen Lee
David Lee
Mark Haines
Julie Winkle Giulioni
Peter Giulioni
Terry Halberg
Lilian Lu
Henry R. Jones
Margie Ferree Jones
Joe Jacob
Bonnie Tsang
Corey Miller
Charlene Miller
Katherine Adamson
Tina LaMonica
Clarice Knapp
Harry Knapp
Michael Messner
Pierrette Hondagner-Sotelo
Valerie Huber
Jenny Teal

David Ho
Vicki Ho
Deni Sinnott
Mako Koiwai
Donna Bartlett
Kevin Lutz
Deborah Lutz
Stephen Lawes
Gina Lawes
Joanne Nuckols
Tom Nuckols
Peter Lam
Wendy Lam

- **How addressed:** The City held three public meetings to discuss the changes made in this draft of the Housing Element, and ensured the community had ten days to provide public comments. The City has a requirement to address issues related to Affirmatively Furthering Fair Housing and to accommodate the number of homes allocated to it through the Regional Housing Needs Allocation process. The policies in the Housing Element fulfill those requirements.

Julian Petrillo (March 13, 2023)
Hello there. Julian Petrillo here, going on 25-year resident of South Pasadena. Recently it came to my attention that there's a draft of a new SP housing element which would consider allowing multi-unit dwellings just about anywhere, and also that height limits of 7-10 stories are under consideration. These policies will change the way of life that all residents of 91030 prioritize and strive for when they pay their significant property taxes. I urge the city and staff to find another way to meet occupancy and density requirements, rather than taking on new regulations such as those.

Thank you for your consideration.

Julian Petrillo
800 Adelaine Avenue

- **How addressed:** The City is required by the State of California to address issues related to Affirmatively Furthering Fair Housing, and in addition to accommodate the number of affordable homes and total number of homes allocated through the Regional Housing Needs Allocation (RHNA) process. The City must then demonstrate plans which can accommodate these three housing goals.The policies in the Housing Element fulfill those requirements.

Mary Urquhart (March 13, 2023)
The 5th Draft on Housing Element is nearing its completion. However, I did want to make an additional comment before the final deadline.

We have City properties that should be considered when developing additional housing in order to provide affordable housing for City staff and the community at large. These properties could be considered alternatives to other options already identified by the City. We currently have an 18-hole golf course, which could be turned into a 9-hole golf course to allow for a girls' softball field and possibly another playground and outside tennis courts. That would allow the city to build additional housing and affordable housing on the City-owned site located at 1102 Oxley Street, which actually "fronts" the intersection of Mission Street and Orange Grove Avenue, adjacent to a softball field and playground. The mechanical repair and storage building at that location should be moved to a

location outside of the area so critical to transportation. The community building at that location needs significant repairs and has limited historical relevance. A conversion to housing, moving the recreation facilities to the golf course area, would be a great solution. Using a 'layering approach' we can be creative to redesign this area to respect the adjacent homes and helps solve our housing crisis. The proximity to the train station is key, and there is close access to the 110 Freeway.

Changing single-family residential neighborhoods to densify our city should change only after we have exhausted all available corridors on Fair Oaks, Huntington Drive, Mission Drive (west of The Gold Line), and the Arroyo.

Thank you for your consideration,

Mary Urquhart

- **How addressed:** The golf course was considered as a housing site during the February 1st City Council meeting. The City Council directed staff to find alternative to accommodate the city's housing needs that did not remove recreational open space from the city. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo. As the Housing Element is part of the General Plan, it must be consistent with other General Plan elements, including the Open Space Element which requires sufficient recreational space for the residents of the City. However, the City is committed to continue to analyze additional sites, including potential sites in the Arroyo in the future.

South Pasadena Tenants Union (March 13, 2023)
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030
Attn: Allison Becker and Angelica Fausto

Re: AMMENDED 5th Draft Housing Element – Public Comment

Dear Ms. Becker and Ms Frausto-Lupo:

After further contemplation, South Pasadena Tenants Union leadership is submitting this amended public comment on the March 7, 5th Draft Housing Element.

We are pleased to have reviewed the March 2nd, 5th Draft of the Housing Element. It was/is a bold and expansive housing element, one which might even be the best in the Southland. We applaud staff for the inclusions of the tenant protections and the acknowledgment that preserving affordable housing is a priority in this process. We look forward to working with the City, the residents of South Pasadena and the Council to ensure that these policies are the best that they can be and are enacted effectively and within a timeframe that is beneficial to those whom they are intended to protect: the 53.5%.

We are not happy to learn that the original draft of March 2nd was substantially revised and without any published responses/comments indicating public input. In reviewing the March 7th redline version, we oppose the proposed program addressing the fate of the CalTrans homes. In this draft, the proposed implementation of SB381 has changed drastically from the March 2nd version. It is our understanding that there are no legal alternatives to SB381 and therefore we are stymied by this latest

change and urge the City to revise the draft submitted to HCD to include the original text from March 2.

With regard to the revision indicated by the March 7 version for citywide fourplexes, also significantly different from the March 2nd draft, we find that we can remain wholly supportive of the current proposed change. In order to ensure that the City can maximize housing for lower wage earning residents and middle income residents, we support triplexes and fourplexes being limited to the high transit areas with a rent stabilization ordinance that is fully enacted no later than December 2023. Therefore, our one public comment regarding the most recent March 7 version of the 5th Draft Housing element is below:

For program 6.d, SPTU asks that you include within the 5th draft implementation of a rent stabilization ordinance by December 2023.

South Pasadena Tenants Union looks forward to seeing our input included with the expediency that other revisions have been made in the last few days so that we can comfortably and wholeheartedly commit our support of the 5th Draft to HCD. We are aware that at least one Councilperson had requested that her constituents oppose major components of the March 2 draft with letters to the City Manager. Within hours of that email being circulated, the March 7 redline version was published.

South Pasadena Tenants Union expects that the City act in good faith and weighs our input equally to that of other influencers in the community by including our abovementioned request.

If you have any questions or would like to discuss, I look forward to hearing from you. I can be reached Anne Bagasao at eabagasao@hotmail.com or by phone at 626-660-8837.

Sincerely,
Anne Bagasao, Co-Founder

- **How addressed:** The timeframe for Program 6.d requires that City Council consider a rent stabilization ordinance no later than December 2023.

Joanne Nuckols (March 13, 2023)
I am opposed to any unbundling or separating of parking from any housing development as on page 153 referencing Downtown Specific Plan. This would be a disaster with many unintended consequences. Any reference should be removed from the HE draft unless and until there is a thorough study of the negative impacts of doing so.

Joanne Nuckols
South Pasadena

- **How addressed:** The Housing Element incorporates existing California law with regards to parking in proximity to high-quality transit.

Ed Elsner (March 22, 23, and 24, 2023)
[**Note from City:** The City received three comments from this commentor over the course of three days all on the same subject. All three comments are shown below, and only one response is provided to these three comments since they deal with the same subject.]

> **March 22, 2023 comment letter**
> Dear Director Frausto-Lupo,

The draft housing element's rezoning capacity analysis (Table VI-51) is seriously flawed.

The table undercounts existing housing units. For example, every listed site whose current land use is High Density Residential is incorrectly shown as having "0" existing units. This error means that thousands of existing units have not been counted, and that the total Maximum Additional Development Capacity for the listed sites is therefore overstated by the same amount.

On the other side of the coin, the Table VI-51 miscalculates the total Development Capacity Adjustment for every listed site with a residential zoning capacity of 50 du/ac or more. Although these sites are ostensibly given a 400% development capacity adjustment, the 400% adjustment is not included in the calculation of the total adjustment for any site, resulting in the understatement of total Anticipated Development Capacity by hundreds of units, possibly more. Anticipated Development Capacity is perhaps the most critical metric in the housing element.

These errors have obvious and serious implications for policy making.

For example, as a last-minute addition to the draft housing element, the rezoning of Huntington Drive (to mixed-use with 70 du/ac density) will promote the displacement of many residential tenants. As a practical matter, the displacement will be permanent, for the reasons discussed in my previous comment published at page B1-234 of the draft. The human impacts of mass eviction and involuntary displacement can be devastating, and the decision to rezone Huntington Drive was a rushed decision that was not supported by reliable data.

Every listed Medium Density Residential site and High Density Residential site whose existing unit count is shown as "0" or "1" is suspect and should be checked by searching the APN on the County Assessor's online portal (https://portal.assessor.lacounty.gov/). The existing unit count for each site should be updated as necessary.

Also, the 400% density adjustment should be included in the total development capacity adjustment for every listed site with a residential zoning of 50 du/ac or more. There is likely a formula error in the spreadsheet that needs to be resolved.

Once these errors are fixed, a determination should be made whether it is really necessary to rezone Huntington Drive to mixed-use, 70 du/ac, in order to meet the city's RHNA obligations. If the city is able to rezone residential sites on Huntington Drive to 30 du/ac (medium density) or 45 du/ac (high density), as it is doing elsewhere in the city, this would minimize the displacement of existing tenants.

Thanks again for your continuing work on the housing element and for your consideration of these comments.

Ed Elsner
edelsner44@gmail.com

March 23, 2023 comment letter
A quick follow up to my comment submitted yesterday:

Once the 400% development capacity adjustment is correctly applied to listed sites with a density of 50 du/ac or more, the new total anticipated development capacity is 3,819 housing units according to my calculation.

To put this in perspective, this is 2641 more housing units than the 1,178 total anticipated development capacity stated in the draft housing element for the sites listed in the uncorrected Table VI-51.

It is also 574 more housing units than the city's entire RHNA allocation of 2,067.

With an accurate count of existing units, the total anticipated development capacity will decrease.

But the magnitude of the capacity adjustment error suggests that the city will be able to meet its RHNA obligations without needing to increase density on Huntington Drive to 70 du/ac.

In any event, I don't think the city should be committing to the rezoning programs included in the draft housing element until a corrected Table VI-51 is reviewed and analyzed, even if that means delaying the submission of the draft to HCD.

Thanks again,

Ed Elsner
edelsner44@gmail.com

March 24, 2023 comment letter
Dear Director Frausto-Lupo,

Thank you again for the opportunity to comment on the 5th draft housing element that will be submitted to HCD later today.

The draft indicates that the development standards for the Huntington Drive zone will mirror the standards for the Mission Street Zone of the Downtown Specific Plan.

One suggestion would be to clarify that with respect to residential parcels in the Huntington Drive zone whose current land use is Medium Density Residential or High Density Residential, a specific allowable density is yet to be determined through a zoning process subsequent to the adoption of the housing element, with input from the community and especially from residential tenants who live on Huntington Drive, who would be at risk of displacement from redevelopment.

Stated another way, the allowable 70 du/ac density for the Mission Street Zone in the Downtown Specific Plan should not be considered an objective general plan standard or criteria for the Medium Density Residential or High Residential Density parcels in the Huntington Drive Zone, but a possible allowable density along with 30 du/ac or 45 du/ac mentioned in my previous comments.

A 70 du/ac density in the Huntington Drive zone should be reserved for existing commercial parcels which would be more suitable for redevelopment as mixed-use projects, and I'm

confident that the city can still meet its RHNA obligations with lower densities for residential parcels on Huntington Drive.

One final suggestion, there should be protections against tenant harassment as part of the package of protections for residential tenants, with appropriate remedies to deter bad actors from improperly influencing tenants to vacate in order to avoid compliance with the other tenant protections the city is proposing.

Thanks again, and best of luck with the submission of the draft.

Ed Elsner
edelsner44@gmail.com

- **How addressed:** City staff met with commenter on 3/24/23, prior to his final comment, to discuss his concerns. Staff acknowledged the limitations of the dataset that is used for the capacity analysis (Table VI-51). Data was pulled from our vendor's site and was not closely screened before building the new table. Staff also acknowledged the possibility of a formula error in the table. Upon further review after the meeting with the commenter, the City's Housing Element consultant determined that there is not a formula error in the table.

  Staff clarified that the purpose of the table was to illustrate the breadth of the future rezoning areas and that the upcoming general plan update process would be used to refine the rezoning strategies. Staff clarified that our obligation with the housing element is to identify areas where development can be achieved and our commitment is to engage in a public process to rezone within the areas identified to accommodate our RHNA obligations with a reasonable buffer in order to produce a responsible long-range general plan.

  Staff addressed the potential impact of rezoning on existing multi-family residential buildings and underscored the City's commitment to developing a slate of tenant protection programs.

  Staff clarified that in the instance of Huntington Drive, the term "mixed-use zone" was used to reflect the existing corridor conditions with comingled multi-family and commercial zoning. New "mixed use" is contemplated for existing commercially zoned properties, and increased development capacity is contemplated for existing multi-family properties. The City is not considering converting residential to commercial land uses.

Steven Appleton (March 24, 2023)
Public Comments on the City of South Pasadena 5th Draft Housing Element, Clean Version.
Submitted on March 23, 2023.
Submitted on March 24, 2023 at 11:55 am

COMMENT 1:

In several locations in the 5th Draft Housing Element of the City of South Pasadena the subject of Rental Housing inspections is addressed, including direct mention of Assembly Bill 838. References can be found on pages 7, 67,68,255 and B1-47. The following statement summarizes the City's stated intent:

"To augment the City's already established code enforcement work, Community Development staff will develop and propose for City Council's approval a Rental Housing Inspection Program, which would entail systematic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes. This program will support the City's inspection of rental properties in response to a tenant's complaint of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement but also preventing tenant habitability issues before they emerge. "page 7.

I am a tenant who complained about substandard conditions and requested Code Enforcement inspection of the unit my family rented in South Pasadena, but City refused to inspect even after July 1. 2022 when it was obligated to inspect per the provisions of AB 838. The City continues to state a policy of "no inspection" of rental housing. As such, I question the 8-year timetable for implementing a full inspection program stated on page 7. If the Housing Element is approved with such a liberal timeline for compliance with AB838, it would enable the continuation of practices that play a role in the displacement of tenants.

I offer the below as rational for my comment:

On three occasions after July 1, 2022, I requested Code Enforcement of the City of South Pasadena to inspect the premises because of improper egress (substandard stairs to unpermitted sleeping quarters), fire code violations, and lack of heating etc. In each case I was told that "City of South Pasadena does not have an occupancy inspection program and will not inspect the property." I was referred to a nonprofit tenant's rights group.

City of South Pasadena's refusal to inspect our rental premises is an unfulfilled obligation. The failure to inspect as required by law impacted our move-out. Future tenants are also impacted. Objective code and habitability inspection would reveal unsafe conditions, including structural deficiencies caused by unpermitted construction that continue to pose risk to any future tenants. Therefore, I have continued to request an inspection of the premises based on the fact that the failure to inspect when requested is an unfilled obligation of the City. The response of City staff was to quote the "no rental housing inspection policy of the City," as noted below:

Angelica Frausto-Lupo , Community Development Director, City of South Pasadena, January 17, 2023: "I had my building team look into the matter and there is insufficient reason for further investigation or to open a code enforcement case. Further, the City of South Pasadena currently does not have an occupancy inspection program and as such we will not pursue inspection of these properties."

Paul Riddle, Fire Chief, City of South Pasadena, March 13, 2023:

"I discussed with our Building Department had they advised that this matter has insufficient reason for further investigation or to open a code enforcement case. They also cited the fact, the City of South Pasadena does not have an occupancy inspection program and as such they will not pursue inspection of these properties. Tenants can reach out to a landlord/tenant rights organization such as the Housing Rights Center, https://www.housingrightscenter.org/ or the LA County Department of Public Health to file a complaint.

I suggest that the Housing Element is deficient unless the City of South Pasadena revises it to state that the City of South Pasadena will:

1) Immediately accept and process rental housing inspection requests made by tenants or tenant agents in line with the provisions of AB 838.
2) Immediately instruct all staff to change messaging to reflect that tenants have a right to request an inspection and be informed of the results of inspections.
3) Retroactively inspect any housing where a complaint was made by a tenant after July 1,2022 but City refused to inspect. (If a request was made after July 1, 2022, the City's refusal to inspect is an unfulfilled obligation. The unfulfilled obligation has continuing impacts on past and future tenants.)

COMMENT 2:

I guide you to page Page B1-135 under "How Addressed". In reference to Table VI-26, the document states, "It should be noted that these units are all single-family properties, and do not include multi-unit rental properties."

The Housing Element should clarify that the City will accept and process rental housing inspection requests of tenants of multi-family housing.

Steven Appleton

- **How addressed:** The City acknowledges that at the time of the events Mr. Appleton refers to, the City was unprepared to fulfill its responsibilities under AB 838. The City is currently aware of its responsibilities under AB 838 and we are attempting to comply with the law. Should a tenant contact the City to request an inspection, we will respond in compliance with AB 838. This obligation is being formalized into a program under the Housing Element by including a proposed occupancy inspection program which would entail systemic, proactive, and routine inspections of certain rental properties to ensure compliance with health and safety codes as noted in the Housing Element Program 1.c-"Housing Rehabilitation and Code Enforcement." As stated in Program 1.c., the proposed occupancy inspection program "will support the City's inspection of rental properties in response to tenant's complaints of substandard conditions as required under AB 838 by not only providing the infrastructure and capacity for code enforcement, but also preventing tenant habitability issues before they emerge."

Anonymous (March 24, 2023)

As a resident, small developer and commercial property owner on Huntington Drive, I think the city's future development needs require a more aggressive plan for the Huntington Corridor. Right now the Housing Element's main focus is developing the DTSP and expanding the DTSP development standards to other areas including the proposed mixed-use zones.(See Program 3.A and 3.B., Housing Element, 5th draft). But that seems flawed as the DTSP development standards are based on the limits of the downtown area. These include historical resources, the area's existing density, traffic congestion, the small two lane roads that make up Mission St.and Monterey St. and the many more smaller one lane roads that intersect them. However, none of these qualities exist in the same proportion on the Huntington Drive Corridor. Huntington Drive is about 110ft wide. It is a large 3 lane road with NO significant historical resource or comparable density and traffic. Consequently, Huntington Drive can support development standards that are DOUBLE that of the DTSP. With sufficient height and density allowance the majority of the City's RHNA obligations can be satisfied from this area alone. This would create less of a burden to develop the more historically sensitive neighborhoods that make up the DNA of the City's heritage and charms. However, as the area consists largely of income generating commercial and multi family properties, the DTSP development

standards as proposed (namely a 70/110 DU/AC and 2.5 F.A.R. is insufficient to motivate us to risk losing guaranteed existing income.

Consequently, creating a different development standard that provides for even more density and massing than the DTSP is warranted and should be supported. Additionally, developing the Huntington Corridor into a highly dense lively mixed use zone will create desperately needed housing and provide for the City's future growth whilst protecting the City's historic family neighborhood charm.

-Anonymous Resident, Owner and Small Developer

- **How addressed:** The Housing Element accommodates the City's RHNA requirements throughout the city, including within the downtown area and along Huntington Drive.

Josh Albrektson (May 4, 2023)

At the Feb first city council meeting, Mr. Anderson, the lawyer for the pavilions property, clearly stated that he needed 140 to 160 DU/acre in order for the project to be feasible.

In response, the City of South Pasadena set the density to 110 DU/Acre, 35% lower than what Mr. Anderson said was required for feasible. Alison Backer in her meeting with me told me that it was intentionally and they considered removing the site as a possible housing site.

South Pasadena is intentionally trying to make sure the pavilions cannot be redeveloped and they should be forced to rezone the Fair Oaks corridor to 140 DU/Acre.

If they do not do this, then there should be a hard deadline that if they do not have a project proposed on Fair Oaks, say by May 1st, 2026 then it would automatically go to 140 DU/Acre.

--
Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

- **How addressed:** As the City discussed with HCD during its April 24th meeting, Site 15 will be rezoned to allow for 110 du/ac, along with the entire Fair Oaks Avenue corridor. As HCD's research shows, this density is sufficient to ensure the site is viable for redevelopment to residential uses. Furthermore, the comments made by the property owner's representative during the February 1st City Council meeting mentioned a variety of viable densities. While they did state that 140 du/ac would be needed, that was with a higher inclusionary requirement than the city currently has, while the City has committed to reducing its inclusionary requirement, and to review and update the reduced requirement throughout the planning period to ensure that it does not create a constraint on development.

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Appendix E:
Accessory Dwelling Unit Projection Methodology

Analysis for projecting accessory dwelling units as part of meeting South Pasadena's Regional Housing Needs Allocation (*Revised: September 2022*)

As part of the Housing Element Update for the City of South Pasadena (City) and to ensure that the City is able to meet the Regional Housing Needs Assessment (RHNA) assigned by the Southern California Association of Governments (SCAG), the City may project the number of Accessory Dwelling Units (ADUs) that is expected to be built over the course of the 6th Round Housing Element Cycle. The California Department of Housing and Community Development (HCD) recognizes that ADUs have become more popular in recent years and expects the trend to continue. ADUs are seen as an attractive option for developing housing given their affordability to lower-income renters, relatively low cost to construct, and their ability to provide income and alternative housing options to homeowners.

Assuming a certain number of ADUs will be developed over the course of housing element implementation has been acceptable to the State of California since ADU law was instituted in 2003. These projections are based on recent past ADU development trends in the jurisdiction and the current market rents for ADUs in the jurisdiction. State law regulating ADUs has changed significantly since 2016, requiring local jurisdictions to allow ADUs more broadly across a jurisdiction and with development standards and other regulations that reduce cost and other barriers to ADU development. This includes changes to require less on-site parking, allow fewer fees to be charged related to ADUs, and allow conversion of existing structures to ADUs.

<u>HCD "Safe Harbor" Calculation</u>

HCD's Housing Element Site Inventory Guidebook, finalized in June 2020, has clarified parameters for analyzing ADU past performance and using it to project the number of ADUs expected to be developed as part of meeting the City's RHNA. HCD has explained that the quantity of ADU building permits issued in previous years, particularly since 2018 as effects of the changes to the law began having more impact, may be used as a baseline for making the calculations. According to HCD, to project the number of ADUs expected, there are two methods that are acceptable to arrive at a 'safe harbor' number for projected ADUs. Both are based on past approvals of ADUs in a jurisdiction. Based on preliminary discussions with HCD for South Pasadena, the safe harbor number can be relied on in the 6th Round Housing Element in combination with programs to comply with state ADU regulations and monitor ADU production. The two options for 'safe harbor' analysis are described here:

- Use the number of ADU building permits in the jurisdiction since January 2018 to estimate new production. Take the average number of ADUs that have received building permits per year since the beginning of 2018. That average number can be assumed to be the average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029). The 6th Cycle RHNA projection period begins June 30, 2021.
- Assume an average increase of five times the previous planning period ADU construction trends prior to 2018. Take the average number of ADUs with building permits issued per year between January 1, 2014, and December 31, 2017, which is the part of the 5th Housing Element RHNA projection period occurring before January 1, 2018, when many of the new ADU laws began to take effect. Multiply that average by five. That average number can be assumed to be the

average number of ADUs that will be permitted per year through the rest of the 6th Cycle RHNA projection period (through October 15, 2029).

A jurisdiction may choose to use one or the other of these approaches if better data is available for one of the timeframes. Before 2018, South Pasadena had only approved one ADU (during the 5th Cycle). During that time, the ADU regulations in the City were much more limiting and ADUs were only allowed on parcels larger than 12,000 square feet. Once the new state laws took effect, the ADU numbers began to increase. Between January 1, 2018, and the present (mid-2022), an average of 16 ADUs received planning permits per year with an increase every year.

Four ADUs received building permits in 2018, seven in 2019, eight in 2020, 19 in 2021 and 38 during the first two-thirds of 2022 (by August 31), for an average of over 16 ADUs per year receiving building permits during that timeframe.

When 16 ADUs per year on average are projected through the end of the projection period, the City estimates a safe harbor number of 148 ADUs between June 30, 2021, and October 15, 2029.

Projection Based on Data Reflecting South Pasadena's Specific Circumstances

If a jurisdiction expects a higher number of ADU approvals in the 6th Cycle than what is projected using one of the safe harbor options, additional data, analysis of trends, and supporting programs, including a monitoring program, must be included in the Housing Element. The City of South Pasadena does expect a higher number of ADUs will be permitted than the safe harbor number of 148 ADUs, because of the recent upward trajectory following updates to the City's ADU zoning regulations that went into effect in early June and December 2021, and based on the results of other ADU programs and initiatives that have been implemented or are planned at the City.

Over five years, ADU building permit activity has increased as follows:

- 2017 to 2018 – increase from 1 to 4 ADUs that received building permits
- 2018 to 2019 – increase from 4 to 7 ADUs that received building permits
- 2019 to 2020 – increase from 7 to 8 ADUs that received building permits
- 2020 to 2021 – increase from 8 to 19 ADUs that received building permits
- 2021 to June 30, 2022 – increase over 6 months to 29 ADUs (or 58 ADUs projected to an annualized number) that received building permits

The 19 permits issued in 2021 and 29 permits issued in the first half of 2022 far exceeded the City's earlier (Public Review Draft) projection of 12 ADU permits. The increase can be attributed to two important policy actions taken by the City Council:

Adoption in December 2021 of an urgency ordinance with standards for constructing ADUs on historic properties, along with comprehensive design guidelines that pave an administrative (by-right) path for owners of historic properties to build an ADU. Council adopted the same ordinance permanently into the Municipal Code on February 2, 2022. These changes to the code resolved issues that have delayed approval of ADUs and reduced application submittals. Staff immediately noticed an increase in interest and new applications with approval of the new standards. Additionally, the City streamlined the application process with new forms and electronic submittal. Accordingly, more complete applications have been received and approved more quickly.

Additionally, at the end of 2021, the City added four new Planning staff to increase permit processing

capacity, including ADU applications.

With increased staffing and clear, objective Code standards, the City has increased confidence in the projections provided in the first two public drafts. The City has already initiated several of the programs in this 2021-2029 Housing Element, including homeowner education and assistance and the ADU amnesty program for property owners with an existing unpermitted ADU on their property to legalize based on compliance with the Building Code. A list of the programs and initiatives the City is undertaking related to ADUs is included at the end of this memo.

The trend in ADU application submittals since the Code was amended, documented above, supports an assumption that the "safe harbor" is far below reasonably projected numbers, and given the City's RHNA, it is important to use a projection that is reflective of the permit activity experienced since conditions changed starting in June 2021. As the third Public Review Draft is released, data through August 2022 shows a sharp increase in applications and building permits, and the City expects to issue 58 ADU building permits in 2022. To maintain a conservative forecast, this sharp increase will be considered to 8 represent a "bubble" due to pent-up demand, with future years of the planning period remaining as forecast earlier (39 annually) as shown in Table 1. In order to remain consistent with the public's and HCD's understanding of the City's approach for the RHNA forecast and the housing program, the City will continue to use the figure of 297 units for those purposes, as projected in earlier public review drafts.

Table 1. Accessory Dwelling Unit Projection

Year	ADU Planning Permits	ADU Building Permits
2020 - Actual	17	8
2021 - Actual	62	19
Issued from June 30 through December 31 2021 (Actual)	28	9
Issued from January 1 through June 30 2022 (Actual)	50	29
Remainder of 2022	50	29
2023	55	39
2024	55	39
2025	55	39
2026	55	39
2027	55	39
2028	55	39
2029 (through October 15)	40	28
Total January 1, 2022-October 15, 2029	**470**	**320**

It is quite possible that the projection in Table 1 is too low, as market trends show growing popularity for ADU construction. Applications on historic properties in particular are just beginning to be submitted. For informational purposes, a second, more robust, scenario is included in Table 3 that assumes that 2022 was a bubble, but which projects a stronger growth trend throughout the planning period, with 75% of applications moving forward to building permit issuance.

ADU Affordability Analysis

SCAG prepared its Regional ADU Affordability Analysis for the entire SCAG region in 2020. The analysis was accepted by HCD in late 2020 and is the best proxy for estimating affordability levels for

South Pasadena. The analysis made findings for affordability of ADUs by subregion based on data gathered on current rents and occupancy of ADUs in addition to industry research about affordability levels of ADUs, including those that do not reach the rental market. ADU research conducted by the University of California, Berkeley's Center for Community Innovation[i] indicates that 40 percent of ADUs are typically rented to family members or friends at either no cost or below-market rental rates. SCAG conservatively estimated that 15 percent of the ADUs in their region would be in this category and thus rented to the extremely low-income category of households. Table 2 lists the projected 297 ADUs by income category based on the SCAG analysis for the Los Angeles II subregion that includes South Pasadena.

Table 2. Projected ADUs - Affordability

Percentage	Number of ADUs	Income Category Affordable To:
15%	45	Extremely Low Income
9%	27	Very Low Income
44%	131	Low Income
2%	6	Moderate Income
30%	89	Above Moderate Income
100%	**297**	**Total**

An Alternative Projection Based on the 2021-2022 ADU Permit Trend

As noted above, Table 3 presents a scenario that reflects the actual number of approved ADU Planning applications and building permits issued in 2021, accounts for 2022 ADU permits as a bubble, and assumes an increase in applications from 2021 to 2023 that continues for three years before leveling off. This scenario also assumes that 75 percent of approved Planning applications will receive building permits. Based on these assumptions, this more robust scenario projects a total of 403 ADUs between January 1, 2022, and October 15, 2029.

Table 3. Possible Higher Accessory Dwelling Unit Projection

Year	ADU Planning Applications	ADU Building Permits Issued	Notes
2020	30	8	Actual
2021	45	21	Actual 150% increase in Planning applications; 400% increase in building permits.
Issued after June 30, 2021	28	9	Actual
2022	100	58	Assumption of same level of applications for the remainder of 2022 (same as Table 1)
2023	55	41	Assumption of 2022 as a bubble, but increase in applications over 2021 and 75% moving forward to building permits
2024	60	45	Assumption of 10% increase in applications and 75% moving forward to building permits
2025	66	50	
2026	72	54	
2027	72	54	Assumption of steady application rate, no increase
2028	72	54	
2029 (through October 15)	63	47	Same assumption as previous year, through October 15, 2029
Total January 1, 2022-October 15, 2029	**560**	**403**	

Projections Relative to Existing Single-family Housing Stock

In 2019, South Pasadena's single-family housing stock consisted of 5,642 units. 30 ADU permits were issued in the previous housing element cycle, including the first half of 2021.

The projection of 297 units, which is used for RHNA and program purposes in this housing element and Table 3 both project many more ADUs, and for context, it is informative to consider the number of single-family properties within the city and whether those projections make sense within that context. Table 4 includes the 30 5th cycle ADUs, the 9 units permitted in the 2nd half of 2021, together with the actual and projected 2022-2029 ADUs for both projection scenarios and calculates them as a percentage of the 2019 housing stock. As shown, the more conservative projection would result in about 6 percent of single-family properties that have ADUs in 2029. The more aggressive scenario results in 7.8 percent. In either case, more than 92 percent of single-family properties remain unchanged.

Table 4: Percentage of ADUs Projected Relative to Housing Stock			
Housing Stock (5,642 units)	5,642	Additional ADUs as a % of housing stock	Total ADUs as a % of housing stock
297ADUs (+30+9)	336	5.4%	6.6%
Table 3 ADUs (+30+9)	442	7.3%	7.8%

Additionally, the estimate of ADUs as a percentage of single-family properties does not take into account that some ADUs will be constructed on multifamily properties. It is anticipated that these will become more popular as apartment building owners get savvier regarding ADU law. As of 2022, the City has already approved the first such applications. Furthermore, the City's program creating an amnesty process for illegal units, to recognize them as ADUs, will bring additional units into the housing stock, and are not contemplated in this scenario. Based on this information, it can be concluded that both of the ADU projection scenarios are realistic within the context of the overall existing housing stock in South Pasadena.

City of South Pasadena ADU Initiatives and Programs for 2021-2029

Program 3.f – Allow and Facilitate ADUs

Assumption of same level of applications and 75% moving forward to building permits

Program 3.i – ADU Amnesty Program

Program 3.j – Adjust ADU Permit, Utility Connection, and Impact Fees

Program 3.k – ADU Education and Promotion and Homeowner Outreach

[i] Chapple et al. 2017. *Jumpstarting the Market for Accessory Dwelling Units: Lessons Learned from Portland, Seattle, and Vancouver.* University of California, Berkeley's Center for Community Innovation.

Appendix F:
Realistic Capacity Analysis

Justification of the 95 percent Realistic Capacity Assumption Applied to Downtown and Mixed-Use Sites

Much of the City of South Pasadena's lower-income Regional Housing Needs Assessment (RHNA) is proposed to be accommodated in the Draft Downtown Specific Plan (DTSP) area and the mixed-use Neighborhood Centers proposed in the General Plan Update. These sites are included in the set of sites with detailed exhibits and descriptions in Appendix A. Where full redevelopment of a site or adding to existing structures is assumed for the Housing Element analysis, a realistic development capacity of 95 percent is assumed. The realistic capacity assumption of 95 percent is supported by past and current trends showing redevelopment at 97 percent or more of the base capacity and by new policies requiring inclusionary housing and providing design incentives, FAR bonuses, height concessions and other options to increase density (state density bonus) for projects on these sites. This appendix is included to provide the background and analysis to support that 95-percent assumption.

Multi-unit Housing: Trending Upward in South Pasadena and Regionally

The City of South Pasadena is nearly built out and has very little vacant land of a size suitable for multifamily development. However, the market in South Pasadena and the region has addressed this situation with infill and mixed-use redevelopment of sites that include a portion or all of the site with new residential units.

After a hiatus following construction of South Pasadena's first new mixed-use, transit-adjacent development in 2005, several multiple-unit residential or mixed-use projects containing higher density housing have recently been constructed or approved in South Pasadena (see Table 1), demonstrating an increasing interest to construct multi-family housing in the city. These are all on sites that were previously developed. The Mission Bell Project, approved in 2020, includes adaptive reuse of existing historic structures. The Senior Housing Project, with 13 affordable units, was approved in 2020 under the City's first state density bonus application. The Seven Patios Project, with 60 housing units, was approved in 2021. All three projects were able to achieve higher densities with a range from 22 to 50 dwelling units per acre (du/ac) without accounting for removal of the nonresidential portions of the project from the total parcel or site in the case of the mixed-use projects. All three projects achieved higher than 95 percent of allowed development capacity and two achieved higher than 100 percent. While the trend toward higher density, mixed-use development in South Pasadena is more recent, it is consistent with what is happening in the region, where projects containing multi-family housing of various densities, unit sizes, and architectural styles are being developed at 100 percent or higher percent of allowed capacity on previously developed sites (See Housing Element Tables VI-44 and 42). Most are receiving the entitlements with the inclusion of dedicated affordable units as a prerequisite to receiving significant density bonuses that are attractive to developers and make the project feasible.

Table 1. Representative Projects on Non-Vacant Sites in South Pasadena

Address/ Project Name	Assessor's Parcel Numbers	Acres	Entitled, Under Construction, or Completed?	Zone	Previously Developed With/ Existing Uses	Project Description	Total Number of Dwelling Units	Density	Percentage of Allowed Capacity	Similar Sites in Table VI-46 (and Site ID)
Seven Patios 845 El Centro Street	5315-019-048 5315-019-045 5315-019-046	1.6	Entitled in 2021; Construction anticipated in 2022	MSSP and RM	Office building Three parcels were consolidated	Mixed-use, transit-oriented development (TOD), multifamily housing (studios, lofts, flats, and townhomes), and street-fronting commercial uses (restaurant and retail).	60	45 du/acre in MSSP portion 9 du/acre in RM portion	97% of allowed FAR and >100% allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.45 FAR	Odd-shaped sites near transit: Gold Line Storage (10); North side of Mission (8, 11, 13, 14); Other sites near rail transit: City Yard (9); Fremont/Mission (13, 14), Arco (9)
Mission Bell 1101, 1107, 1115 Mission Street	5315-008-045 5315-008-043	0.72	Entitled in 2020; Construction anticipated in 2022	MSSP	A portion of the existing historic building to be demolished and the other portion adaptively reused Two parcels were consolidated	Mixed-use: 7,394 square feet of commercial retail space along Mission Street and Fairview Avenue frontages and 36 residential units above and to the rear of the commercial uses.	36	50	98% of allowed FAR and >100% of allowed density (project used bonus parking for extra floor); MSSP density is capped only by development standards (not du/ac); max FAR is 1.5; project used 1.48 FAR	School Site -12 (historic resource); Site Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined);
Eight Twenty 820 Mission Street	5315-017-094 5315-017-082 5315-017-067 5315-017-103	1.90	Built in 2017	MSSP	Laboratories	Mixed-use, TOD, multifamily housing (studios, lofts, flats, and townhomes) and street-fronting commercial uses.	38	20	109% of allowed FAR (allowed FAR was 0.8; project approved at 0.87 FAR through Planned Development Permit process)	Gold Line Storage - 10; Parking Lot sites -15, 16, 21 (rectangular; several parcels combined)
625 Fair Oaks Senior Housing	5315-001-072	2.62	Entitled in spring 2020	CO	Commercial retail with underutilized parking lot No parcel consolidation for redevelopment	Senior housing with 86 units, 13 affordable. Density bonus project with additional height and density.	86	33	138% of allowed density (allowed density is 24 du/acre); FAR is 3.6, including existing office building and additional 2.45 FAR for housing	Sites on Fair Oaks (17, 18, 22, 23, 24)
Mission Meridian Village Meridian Avenue and Mission Street	5315-021-001 5315-021-079 5315-021-047	1.6	Built in 2005	MSSP	Lower-density, dilapidated homes and a convalescent hospital	Residences are all ownership units. Includes three-story mixed-use building w/ 5,000 square feet of ground-floor retail and 14 loft condominiums, residential structures w/50 units—condominiums, townhomes, and duplexes and three single-family residences. Overall density of 40 units/acre.	67	42	97% of allowed FAR (Allowed FAR was 1.5, project approved at 1.45)	Meridian site (Site 11)

Source: PlaceWorks and City of South Pasadena, 2021

Why this trend will continue and likely increase: Inclusionary Housing and Density Bonus

Chapter 6.5 (Housing Development Resources) provides a full narrative of the inclusionary housing ordinance (see *Zoning Provisions to Encourage Affordable Housing*), which Council adopted in May 2021. The projects in Table 1 were developed prior to the City's adoption of this ordinance. Only one of them voluntarily included affordable units and received bonus density and height, achieving 138% of the underlying density (allowed capacity), the highest of the five projects. Now that the inclusionary units are required, coupled with by-right density bonus, this has become a central component of the strategy to build affordable units and forms an important component of the basis for anticipating the 95-percent realistic capacity.

Because the properties identified in the Sites Inventory (Appendix A) with a 95-percent realistic capacity assumption are eligible for the design incentives in the adopted Inclusionary Housing Ordinance and because the Inclusionary Housing regulations apply to all residential projects of more than three units, the realistic capacity on these sites takes the Inclusionary Housing regulations into consideration.

The inclusionary housing regulations streamline use of the State Density Bonus to increase the amount of affordable housing approved in the City. This recent change will work together with proposed changes in the General Plan and Downtown Specific Plan, both currently being updated, to allow higher-density housing in more areas of the city through mixed-use zoning and an affordable housing overlay. These changes will be adopted at or near the same time as Housing Element adoption. Zoning updates to codify those changes will occur shortly after the General Plan and Downtown Specific Plan are adopted. The City has been conducting outreach and gathering input from the community and decision makers since early 2019 and support has been expressed for the proposed increased density.

State and Local Regulations encourage full development of allowed capacity for project feasibility

In the process of developing the inclusionary housing ordinance, the City reviewed analysis of jurisdictions throughout the state, including several with similar housing markets within the San Gabriel Valley and wider Los Angeles County region in order to choose a level that would result in the most affordable units while maintaining project feasibility. The recently increased State density bonus, which offers density bonuses up to 35% or 50% for providing very-low or lower income units, combined with the streamlined incentives, supports economic feasibility for projects with 20% affordable units as required by the ordinance. The City has not been made aware of any pending applications that were cancelled due to adoption of the inclusionary housing regulations. In fact, the effect thus far has been as anticipated; the City has received more inquiries from developers since adopting the inclusionary housing regulations.

In September 2021, the City received the first Design Review application subject to the inclusionary housing code, for 108 one- and two-bedroom condominium units in a mixed-use, 84,198 square-foot, 50-foot height project. The proposed project would include 20% of its base units as affordable. The applicant is requesting to comply with the streamlined density bonus provisions and receive Code-allowed concessions. However, staff understands that many developers need to wait for density increases in the forthcoming General Plan and Downtown Specific Plan before submitting applications.

Ongoing Analysis and Monitoring

In July 2021, the City contracted with EPS, an economics consultant firm, to prepare an Inclusionary Housing In-Lieu Fee Study and develop Affordable Housing Program Recommendations. This work will analyze the inclusionary housing regulations and make recommendations for the City's affordable housing program or participation in a regional affordable housing production program. The analysis will

also support the City's understanding of housing production trends and confirm the assumptions that it is realistic to anticipate that developments will be proposed at 95 percent of the zoning capacity. The City has committed in the programs section of this Housing Element to reviewing the effectiveness of the inclusionary regulations starting in 2022 and revising if needed at that point.

Conclusion

Based on the trends and regulations analyzed, the assumption of 95 percent of realistic development capacity on the DTSP and mixed-use sites is reasonable and potentially conservative based on the fact that the most recently approved and developed multifamily and mixed-use with multifamily projects are developing at a higher percentage of allowed capacity. Table 2 shows the number of units on these sites at 95, 100, and 110 percent of allowed capacity under the proposed DTSP and General Plan. Note that the figures include the small number of sites that have a lower-capacity assumption in the DTSP and mixed-use areas. The realistic capacity percentages are lower on those sites because of existing uses that are anticipated to remain on part of the sites.

While 95 percent is the assumption used for this housing element, the number of units potentially possible at 100 and 110 percent of capacity are included in Table 2 to demonstrate what could easily happen if the recent trends to take advantage of state density bonus law for multifamily projects in South Pasadena continue.

Table 2. Capacity Assumption Alternatives

	95% Capacity	100% Capacity	110% Capacity
Units	1,545	1,623	1,781