



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

Memo

Date: March 9, 2021

To: Chair and Members of the Planning Commission

From: Joanna Hankamer, Planning & Community Development Director

Re: Additional Document No. 2 for Item No. 1 – Draft Inclusionary Housing Ordinance (Continued from 1/26/2021): Public Comments

Three (3) written public comments have been received for this item from the following:

- Doug Smith, Public Counsel
- South Pasadena Tenants Union (multiple signatures)
- Josh Albrektson

The written comments received are attached to this document.

Two audio comments were received from:

- Josh Albrektson.
- Gail Malten

Verbal comments can be heard by clicking on this [link](#).



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South Pasadena Planning Commission
1424 Mission Street
South Pasadena, CA 91030

Delivered via electronic mail.

March 9, 2021

RE: revised draft inclusionary housing ordinance

Dear honorable Commissioners,

We write to encourage the Commission to adopt a strong Inclusionary Housing Ordinance. As outlined below, we urge the Commission to maintain the proposed 20% affordability standard, applied to the total number of dwelling units in the project, *including* any units allowed through a density bonus; maintain the carefully crafted standards to prioritize mixed-income development with on-site affordable units; and prioritize the creation of Very Low- and Extremely Low-Income units. We offer specific recommendations to strengthen the March 9 revised draft inclusionary ordinance (Revised IHO).

Public Counsel is the nation's largest pro bono public interest law firm, and the Southern California affiliate of the Lawyers Committee for Civil Rights Under Law. Our Community Development Project maintains a specific focus on producing and preserving affordable housing. In this capacity, we have been deeply involved in the development of state and local policy aimed at advancing mixed-income development, including but not limited to state density bonus law, the City of Los Angeles Measure JJJ and TOC Program, and the Los Angeles County Inclusionary Housing ordinance.

Inclusionary housing is an important tool to create much-needed affordable housing. Along with strong tenant protections, affordable housing preservation policies, and alternative social housing and community-ownership models, inclusionary housing is an important piece of a comprehensive housing justice framework. Building market-rate housing, alone, will not create housing opportunities for the City's Low, Very Low, and Extremely Low Income residents. As noted in the Staff Report, South Pasadena more than tripled its above-moderate RHNA goals, but fell short of the affordable housing goals. A well-crafted inclusionary housing program will create mixed-income development that better reflects the needs of residents in South Pasadena and opens up opportunity for inclusive and equitable community growth.

The revised draft ordinance (Revised IHO) includes several improvements, but also some proposed amendments that we urge the Commission to reject. We offer the following specific recommendations to strengthen this policy.

- **Require 20% of the total project as affordable.** We strongly support the Planning Department's determination that projects with 11 or more units should include 20% affordability. However, the Revised IHO would effectively reduce this affordability set-aside by applying the 20% inclusionary rate to a lower "pre-bonus" total. The previous draft IHO applied the inclusionary rate to "the total number of market rate units, including units allowed through a density bonus." The new draft applies the inclusionary rate to "the total number of dwelling units in a residential or mixed-use project, excluding any bonus units." This could result in lower affordability contributions and fewer affordable units. For example, consider a project that can build 40 units under current zoning. That project could go up to 54 units with a 35% density bonus provided by State law. Under the previous draft IHO, we understand that the 20% inclusionary would apply to the 54 unit final project total, creating 10.8 affordable units. Under the revised IHO, the 20% inclusionary rate would apply to the 40 unit base, creating only 8 affordable units. Those 8 units would actually amount to just 14.8% of the final 54-unit project. This small change in the Revised IHO will, in some cases, functionally reduce the inclusionary rate for projects that use the density bonus (which all IZ projects would qualify for) from 20% down to 14.8%. The Staff Report cites the City of Pasadena 20% inclusionary rate, but it is important to note that Pasadena applies this 20% rate to "the total number of dwelling units in a residential project,"¹ unlike the proposed IHO which applies the 20% rate to the lower total number of units *excluding* bonus units. We urge the Commission to apply the 20% IZ rate to the total number of dwelling units in the project, including any units allowed through a density bonus.
- **Ensure that off-site units affirmatively further fair housing.** The Revised IHO requires that off-site units be "located on a property within 1,500 feet of the proposed project, or in a comparable neighborhood as determined by the planning commission." We strongly support the 1,500 foot proximity standard, in order to prevent off-site housing units from contributing to income-segregated housing patterns. To further strengthen this important fair housing objective, we recommend amending the "comparable neighborhood" option to require that the Commission's determination take into account the obligation to affirmatively further fair housing.
- **Maximize the length of affordable housing covenants.** In order to maximize the life of affordable units created through this ordinance, we recommend that covenants be affordable for *99 years or the life of the project*, whichever is longer. This will prevent expiring covenants when a residential building is still in operation.

¹ Pasadena Municipal Code Section 17.42.040.A.

- **Ensure that for-sale units that are offered as rental units are affordable to and occupied by Lower, Very Low, and/or Extremely Low Income households.** The Revised IHO stipulates that for-sale units must be offered only at Moderate Income sale prices. However, the Revised IHO also contemplates that a for-sale housing development applicant may opt to offer the for-sale units as rental units. Allowing these units to be rented at Moderate income rates would create a loophole to the requirements that rental units be offered at deeper affordability rates. We encourage the Planning Commission to add a provision that clarifies that any inclusionary unit that is offered for rent must be offered at the affordability levels specified for rental units.

In addition to the above recommendations, we wish to highlight several important standards included in the Revised IHO. We applaud the Planning Department for these provisions and urge the Planning Commission to retain these important standards.

- **Retain the 20% affordability rate across all projects.** Aside from the issue of what denominator the inclusionary rate is applied to (as discussed above), we strongly support the Planning Department's commitment to a 20% inclusionary rate. We would like to clarify some questions about state law raised by other commenters at the January 26 Planning Commission meeting. State law permits, *but does not require*, HCD to review rental housing inclusionary ordinances adopted or amended after September 15, 2017, but only if: (1) the ordinance requires more than 15% of the units to be affordable to lower income households, **and** (2) the locality has either: (a) failed to meet 75% of its share of the above moderate income RHNA prorated over five years, or (b) failed to submit its annual housing element report for the last two years.² According to the Staff Report, South Pasadena has exceeded its above moderate income RHNA, and has submitted timely housing element annual reports.³ State law does not prevent South Pasadena from adopting a 20% inclusionary standard in its effort to meet the affordable housing needs of its residents.
- **Require a mix of Low and Very Low Income Units in all projects over 10 units.** The Revised IHO simplifies the inclusionary requirement across all project with 11 or more units, and requires a 50/50 split between Low and Very Low Income units. This is a very important improvement over the previous draft IHO, which skewed the incentive in a way that would have likely only resulted in the provision of LI units in 26-50 unit projects. A uniform application of the Low and Very Low Income Unit mix will open up housing opportunities for VLI households across all project types.

² Cal. Gov't Code §65850.01(a). See also, Public Interest Law Project, "INCLUSIONARY ZONING REVITALIZED" <http://www.pilpca.org/wp-content/uploads/2018/01/Inclusionary-Zoning-Revitalized-AB-1505-2018.pdf>

³ Staff Report, p.2. See Also,

<https://cahcd.maps.arcgis.com/apps/View/index.html?appid=8ea29422525e4d4c96d52235772596a3>



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- **Create affordable housing in small projects.** The Revised IHO will produce affordability in small and large projects alike. We support the application of affordability standards in small projects between 4 to 10 units.
- **Encourage deeply affordable housing.** The draft IHO prioritizes the creation of deeply affordable housing by including an Extremely Low Income (ELI) set-aside option, and by limiting the provision of Moderate Income units only to smaller projects and For-Sale projects.
- **Prioritize on-site affordable housing.** The draft IHO also includes carefully crafted standards for off-site units and, very importantly, limits in-lieu fees to small projects. While in-lieu fees can help generate funding for affordable housing, they often undermine goals of inclusive mixed-income development. By prioritizing on-site affordable housing, limiting in-lieu fees to only small projects and fractional units, and allowing only off-site construction with strong fair housing standards, the City will help create new housing for all incomes and promote equitable community growth.

Thank you for considering these comments and recommendations. Please feel free to reach out with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Doug Smith".

Doug Smith
Supervising Senior Staff Attorney
dsmith@publiccounsel.org



**SOUTH PASADENA
TENANTS UNION**

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March 9, 2021

South Pasadena Planning Commission

Public Comment Regarding Agenda No. 1, Recommendation to City Council to Adopt an
Inclusionary Housing Ordinance

The South Pasadena Tenants Union (SPTU) supported the Planning Department's inclusionary housing ordinance introduced at the January 26, 2021 meeting of the Planning Commission. Since then, we have been building support in the community for its key provisions: 1) a robust 20% set aside for affordable units in larger developments, and 2) the requirement that all but the smallest projects must develop on-site units rather than pay in-lieu-of fees. (*See Public Comment to City Council, March 3, 2021*).

The Planning Department revised the draft ordinance in ways that will undermine its efficacy in affordable housing production.

First, in terms of satisfying the 20% affordability set aside, the revised ordinance excludes any bonus units added pursuant to state law. The previous draft read, "All residential developments subject to this division shall include a minimum number of the required inclusionary units, calculated based on the total number of market rate units, *including* units allowed through a density bonus." The exclusion of bonus density units in calculating the number of affordable units required means that **the real set aside for affordable units will be less than 20%** anytime developers pursue a density increase under state or local law.

This revision to the IHO will create a major shortfall in the development of affordable housing throughout the city of South Pasadena. Given the city's RHNA allocation of 1,151 affordable units and its claim that it lacks space in which to build them, **every unit counts**. The City of Pasadena – which the Planning Memo holds up as an example of a successful inclusionary housing ordinance with a 20% affordability set aside – requires 20% of *all* units developed, including density bonus units, to be affordable.

Second, the revised ordinance provides that inclusionary units that are for sale will "be provided at the moderate income level." The ordinance allows rental of for-sale inclusionary housing units. Taken together, these provisions **create a loophole wherein developers will rent "for-sale" inclusionary housing units to moderate income individuals**.

South Pasadena does not have a deficit in rental housing stock that is affordable to moderate income individuals. It has a major deficit in housing affordable to Lower, Very Low and Extremely Low Income households. The loophole works at cross purposes with the ordinance's goal of shoring up production of deeply affordable housing.

South Pasadenans support inclusionary housing. The South Pasadena Tenants Union has put its weight behind the ordinance, not because we liked everything about the first draft, (*see* SPTU January 26, 2021 comment to Planning Commission), but because we are willing to compromise in favor of a 20% affordability set aside that will produce deeply affordable units to low-income residents. For the reasons outlined above, **the revised draft does not have SPTU's support.**

We demand the Planning Commissioners revise the ordinance to:

- 1) Require 20% of all units, including any bonus density units, to be affordable; and
- 2) Require all inclusionary housing units offered for rent—whether for-sale or not—be offered at Lower, Very Low or Extremely Low Income level.

Thank you for your consideration.

Anne Bagasao
Ella Hushagen
John Srebalus
Helen Tran

March 3, 2021

General Public Comment, Open Session

We heartily applaud South Pasadena's Planning Department for proposing an inclusionary zoning ordinance. We are asking the Councilmembers to endorse key components of the draft ordinance, and instruct the Planning Commission to move swiftly to finalize its recommendation.

The Planning Department's ordinance will maximize affordable housing development in the city. New housing developments with more than 10 units will be required to include between 15% to 20% affordable units, and developments with more than 25 units will have to build 20% affordable units. These robust requirements for affordable development are on par with what the city of Pasadena requires. Pasadena has observed no disincentive to development since strengthening its inclusionary zoning ordinance.¹

We support the Planning Department's decision to allow developments with three or fewer units to pay in-lieu of fees rather than develop affordable units. This provision will optimize South Pasadena's development of affordable housing by not taking smaller developments with four or more units off the table. In-lieu of fees are generally ineffective. Small cities face special challenges in collecting and leveraging such fees to develop affordable housing.

It is imperative for South Pasadena to adopt an aggressive ordinance, and quickly. First, and most critically, your constituents in South Pasadena support development of affordable housing. The pandemic has illustrated the grave public health crisis caused by a lack of affordable housing in our broader community: people forced to crowd into apartments and houses to make the rent are infected with and die from COVID-19 at significantly higher rates than people who do not live in overcrowded housing.² COVID-19 deaths in our greater Los Angeles County are disproportionately impacting Black and Latinx households—increasing by 1000% from November to January—due largely to overcrowded housing and the lack of affordable housing which increases the spread of the virus.³ This is neither the first nor last public health crisis we will face. The city's moral responsibility to build affordable housing has never been more stark.

Second, the city has fallen far behind in the production of affordable housing. ***In six years, from 2013-2019, the city produced merely 10 affordable units*** out of 93 total units. The city has approved a number of developments in the heart of downtown that contain zero affordable units, like Mission Bell and Seven Patios. The ordinance is designed to make up ground on this disappointing record.

¹ PASADENA NOW, January 25, 2021, "Developers Not Discouraged by Inclusionary Housing Ordinance Amendment." Available online at <https://www.pasadenanow.com/main/developers-not-discouraged-by-inclusionary-housing-ordinance-amendment/>

² Mejia, Brittany, LOS ANGELES TIMES, January 29, 2021, "When coronavirus invaded their small apartment, children desperately tried to protect dad." Available online at <https://www.latimes.com/california/story/2021-01-29/how-overcrowded-housing-led-to-covid-death-la-family>

³ Lin, Rong-Gong & Money, Luke, LOS ANGELES TIMES, January 30, 2021, "Latino COVID-19 deaths hit 'horrifying' levels, up 1,000% since November in L.A. County." Available online at <https://www.latimes.com/california/story/2021-01-29/la-latino-covid-19-deaths-up-1000-percent-since-november>

Finally, South Pasadena appealed its RHNA allocation on the basis that the city is built out and no room remains for new construction. The appeal was unsuccessful; the city would be prudent to operate as though the RHNA allocation will stand. If space is a precious commodity, South Pasadena must optimize remaining sites to develop 1,151 affordable units required by state law.

At the Planning Commission meeting, a number of the commissioners expressed concern that the ordinance seemed rushed. It is not. Inclusionary zoning has been on the city's agenda since 2018. There have been multiple stakeholder meetings about it. The commissioners have previously lamented their inability to require developers to build affordable units without an inclusionary zoning ordinance.

We agree with Commissioner Padilla, who appealed to her colleagues that, "speaking from [her] heart," the inclusionary zoning ordinance is the most critical work the Planning Commission has before it. Commissioner Padilla urged her colleagues to be bold. She cast doubt on fears that the ordinance will deter developers from building in South Pasadena. After all, South Pasadena has the trifecta of outstanding schools, metro access, and walkable streets.

We ask the Council to direct the Planning Commission to recommend the Planning Department's inclusionary zoning ordinance at its next upcoming meeting, and send it to the City Council for first reading by **March 17, 2021**.

Signed,

- | | |
|---------------------------|--------------------------|
| 1. Sean Abajian | 24. Stephanie Ehrlich |
| 2. Alexander Aquino | 25. Betty Emirharian |
| 3. Ahilan Arulanantham | 26. Sarah Erlich |
| 4. Kiera Atkinson | 27. Margaret Farrand |
| 5. Anne Bagasao | 28. Tzung-lin Fu |
| 6. Kerrie Barbato | 29. Will Hoadley-Brill |
| 7. Matthew Barbato | 30. Laboni Hoq |
| 8. Chris Becker | 31. Che Hurley |
| 9. Robin Becker | 32. Ella Hushagen |
| 10. Sierra Betinis | 33. Phung Huynh |
| 11. Katrina Bleckley | 34. Amy Davis Jones |
| 12. Felicie Borredon | 35. Mariana Huerta Jones |
| 13. Laurent Borredon | 36. Amber Jaeger |
| 14. Anny Celsi | 37. Sam Jaeger |
| 15. Amber Chen | 38. Cassandra Kaldor |
| 16. Janna Conner-Niclaes | 39. William Kelly |
| 17. Frederick Eberhardt | 40. Afshin Ketabi |
| 18. Jonathan M. Eisenberg | 41. Caroline Kimbel |
| 19. Barbara Eisenstein | 42. Kristen Kuhlman |
| 20. Richard Elbaum | 43. Caitlin Lainoff |
| 21. Owen Ellickson | 44. Alexandria Levitt |
| 22. Alan Ehrlich | 45. Jacinta Linke |
| 23. Justin Ehrlich | 46. Tony Lockhart |

47. Sofia Lopez
48. Tiana Lopez
49. Elena Mann
50. Ian Marshall
51. Jan Marshall
52. Richard Marshall
53. Robin Meyer
54. Abby McCrate
55. Jenny Munninopas
56. Adam Murray
57. Ayaka Nakaji
58. Raf Niclaes
59. Joanne Nuckols
60. Carla Obert
61. Gayle Oswald
62. John Oswald
63. Victoria Patterson
64. Noah Perez-Silverman
65. Sarah Perez-Silverman
66. Myron Dean Quon

67. Alexandra Ramirez
68. Minoli Ratnatunga
69. Courtney Rojas
70. Allie Schreiner
71. Barrett Schreiner
72. Andrea Seigel
73. Delaine Shane
74. Alexandra Shannon
75. Sean Singleton
76. Allison Smith
77. Christopher Smith
78. John Srebalus
79. Levi Srebalus
80. Kathleen Telser
81. Andrew Terhune
82. Casssandra Terhune
83. Amy Turk
84. Helen Tran
85. Roya Yasharpour
86. Jean Yu



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Attachment 2

January 26, 2021

South Pasadena Planning Commission Special Meeting
Public Comment Regarding Agenda No. 3

We heartily applaud South Pasadena's Planning Department for proposing an inclusionary zoning ordinance. It will undoubtedly make a big impact in the development of affordable housing in the city.

The South Pasadena Tenants Union proposes a number of amendments to the draft ordinance to increase its impact.

1) **Preserve affordability into the future.** The ordinance requires affordable units to be deed-restricted as affordable for 55 years. South Pasadena appealed its RHNA allocation to SCAG in part because the city is already built out, and there is no space for large new developments. If that is so, how will South Pasadena address affordable housing requirements in 55 years as deed restrictions on units expire?

There is no basis to believe that California's affordable housing crisis will be any less acute in 55 years. During the coming 55 years, climate change is all but certain to place a higher premium on housing as coastal erosion, fires and excessive inland temperatures drive people from their homes.

Allowing affordability restrictions to sunset is just kicking the can down the road. We recommend that South Pasadena require deed restriction on affordable units into perpetuity, as Pasadena did in its inclusionary zoning ordinance—with no significant deterrent effect on new development in Pasadena.

2) **Strengthen requirements for off-site affordable units.**

(a) We are concerned about the possibility that developers will opt for off-site development of affordable units, but delay development of those units for years without consequence. We urge Planning to add language to the ordinance that requires the off-site affordable units to obtain certificate of occupancy before the city will issue the certificate of occupancy for the principal site. For example, the Los Angeles County inclusionary zoning ordinance provides, "where affordable housing set-aside units are provided off-site...such units shall obtain a certificate of occupancy from the [Department] prior to the issuance of the final certificate of occupancy for the principal project."

(b) The ordinance should contain a provision preventing the off-site units for one development to count for the inclusionary zoning requirements at the off-site building. In short, there are no two-for-one deals on developing affordable units. All developments must separately satisfy the ordinance's requirements.

(c) The city should consider how to use in lieu of agreements with developers to rehabilitate vacant CalTrans houses as affordable rental housing.

3) **Provide for implementation and monitoring.** The staff memorandum says, "South Pasadena does not currently administer an affordable housing production program, and introducing a program would require an intensive investment of resources." We are concerned that if the city does not allocate any resources to implement and monitor compliance with the ordinance—either using city staff or a contract with an area non-profit organization—the ordinance will be ineffective. Without enforcement, affordable units may sit empty or be filled by tenants who are not income-qualified.

4) **Require developers to include some extremely low-income units.** The staff memorandum recognizes that developers, left to their devices, will primarily develop units for low-income and very low-income renters, and will not develop units for extremely low-income tenants. The memo suggests the city will work with affordable housing developers for 100% affordable developments to remedy this. But, given space constraints and the city's challenges in offering attractive financial incentives to affordable housing developers, the city should embrace alternatives to encourage development of units affordable to extremely low-income tenants.

Los Angeles County's ordinance achieves this by requiring a set aside at an average affordability of 40% Average Median Income. The city could alternatively extend the existing requirement for larger developments with 51 or more units (*i.e.*, 10% low-income and 10% extremely or very low income) to mid-size developments with 26-50 units.

5) **Ensure fair housing.** The ordinance requires that off-site affordable units be within 1500' of the primary development in a 'comparable neighborhood' as determined by the Planning Commission. This is a good way to prevent developers from perpetuating segregation by income and race in our community. The ordinance should ask the Planning Commission to consider, when determining whether affordable units are in a comparable neighborhood, to take into account the city's affirmative obligation to further fair housing.

6) **Maintain existing affordable units.** The ordinance should include a 1:1 replacement requirement, so that if a development demolishes any existing affordable housing, those units will be replaced. If no such requirement exists, a development could demolish 10 affordable units, build a new 10-unit project with two affordable units, and we would have a net loss of eight affordable units.

Thank you for your consideration.

Anne Bagasao
Ella Hushagen
John Srebalus
Helen Tran

Elizabeth Bar-El

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Monday, March 8, 2021 8:00 AM
To: PlanningComments; Diana Mahmud
Subject: Item 1 Planning commission

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.

To repeat a point, please see bottom of page 14 of the HCD Housing Elements Memo:

https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf

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.

In other words, these affordable units are not allowed to be counted for RHNA, no matter how much Planning wants it to be true.

In my other letter I linked the Youtube videos of our Planning Director and Long Range Management director stating the purpose of this IHO is to do exactly that. Please refer to the research Alhambra did which is at the end of your agenda packet.

This is the definition of the income categories, based on Los Angeles County Area Median Income (AMI). This was not explained in the agenda:

Extremely low income: 0-30% of AMI

- Very low income: 30% to 50% of AMI
- Lower income: 50% to 80% of AMI; the term may also be used to mean 0% to 80% of AMI
- Moderate income: 80% to 120% of AMI

When you are reading the Alhambra memo, ELI is 30%, VLI is 50%, Low Income is 80%, and Moderate is 120%. When there is not a specific income listed, they are talking about Low Income.

Planning has presented you with an inclusionary housing ordinance that has the highest affordability level in the history of California. It is higher than San Francisco, higher than Cupertino, and literally higher than every city on the Alhambra research.

They are presenting a 10% Low income AND 10% VLI. Look on the Alhambra sheet. Tell me if you can find a single city that has a 20% IHO that is half 80% income and half 50% income. That doesn’t exist.

Last year the community decided they want an IHO that was 15% low income.

Last meeting Planning said 10% low AND 10% Very Low on projects over 50 units

At this meeting the IHO is 10% Low AND 10% Very Low on projects over 10 units.
What happened?? RHNA. Again, bottom of page 14.....

Planning says that “They don’t want to miss out on affordable units.” If you make the affordability so high, like the highest in the state, you are making sure that not a single affordable unit will be built because all housing

projects are no longer financially viable. They might as well demand 50% Very Low Income and a pony of all projects.

What is the highest IHO on the Alhambra research???

Cupertino, with 15% IHO half Low and half VLI. It is also the location of Apples headquarters and has an average rent of \$3,000.

South Pasadena has an average rent of \$2,000

Here are what the local cities have just adopted

Pomona:

13% moderate income zoning for apartments with a phase in period through summer where it is only 50% of the requirements (100 unit project would have 7 moderate if application turned in by August, 13 if turned in after)

<https://pomona.legistar.com/LegislationDetail.aspx?ID=4737986&GUID=38F0EBE6-122A-495F-AB1B-88C8E1C025E8>

Alhambra, The city that performed the market research planning is citing:

9% low income and 6% Moderate (100 unit project would have 9 low, 6 moderate)

<http://wavepublication.com/alhambra-approves-inclusionary-housing-ordinance/>

Culver City

15% Low Income (A 100 unit project would have 15 Low Income units)

<https://t.co/nj5BZilaVy?amp=1>

And for comparison, San Francisco, the most expensive housing market in California. Still not as high as what planning presented you

10% Very Low and 4% Low and 4% Moderate (100 unit project would have 10 VLI, 4 Low, 4 Mod)

https://sfplanning.org/sites/default/files/documents/legis/inclusionary-affordable-requirements/Inclusionary_Code_Change_Summary_MATRIX_FINAL_12.3.17.pdf

You were presented the highest affordability limit in the history of California because planning didn't read the bottom of page 14 of the sites memo that specifically states you cannot count IHO units for RHNA and RHNA MUST be based on the base zoning of a city.

This IHO would make it so that nothing could financially be built in South Pasadena, and I believe planning knows this.

What's funny is that Planning also hasn't read the section of the Housing Element on realistic development potential. That's at the bottom of page 20:

https://www.hcd.ca.gov/community-development/housing-element/docs/sites_inventory_memo_final06102020.pdf

The implementation of this IHO is a change in the regulatory environment and would decrease the realistic development potential to almost zero, so in order to have a compliant housing element, Planning would have to find a TON more realistic sites.