



**CITY OF SOUTH PASADENA
PLANNING COMMISSION**

**AGENDA
REGULAR MEETING
TUESDAY, AUGUST 8, 2023 AT 6:30 P.M.**

**AMEDEE O. "DICK" RICHARDS JR. COUNCIL CHAMBERS
1424 MISSION STREET, SOUTH PASADENA, CA 91030**

South Pasadena Planning Commission Statement of Civility

As your appointed governing board we will treat each other, members of the public, and city employees with patience, civility and courtesy as a model of the same behavior we wish to reflect in South Pasadena for the conduct of all city business and community participation. The decisions made tonight will be for the benefit of the South Pasadena community and not for personal gain.

NOTICE ON PUBLIC PARTICIPATION & ACCESSIBILITY

The South Pasadena Planning Commission Meeting will be conducted in-person from the Amedee O. "Dick" Richards, Jr. Council Chambers, located at 1424 Mission Street, South Pasadena, CA 91030.

The Meeting will be available:

- In Person – Council Chambers, 1424 Mission Street, South Pasadena
- Via Zoom: <https://us02web.zoom.us/j/83530439651> **Meeting ID: 8353 043 9651**

To maximize public safety while still maintaining transparency and public access, members of the public can observe the meeting via Zoom in the following methods below.

- Go to the Zoom website, <https://Zoom.us/join> and enter the Zoom meeting information; or
- Click on the following unique Zoom meeting link:
<https://us02web.zoom.us/j/83530439651>

CALL TO ORDER:	Chair	Laura Dahl
ROLL CALL:	Chair	Laura Dahl
	Vice-Chair	Lisa Padilla
	Commissioner	Amitabh Barthakur
	Commissioner	John Lesak
	Commissioner	Arnold Swanborn
COUNCIL LIAISON:	Mayor	Jon Primuth

APPROVAL OF AGENDA

Majority vote of the Commission to proceed with Commission business.

DISCLOSURE OF SITE VISITS AND EX-PARTE CONTACTS

Disclosure by Commissioners of site visits and ex-parte contact for items on the agenda.

PUBLIC COMMENT GUIDELINES (Public Comments are limited to 3 minutes)

The Planning Commission welcomes public input. If you would like to comment on an agenda item, members of the public may participate by one of the following options:

Option 1:

Participate in-person at the Council Chambers, 1424 Mission Street, South Pasadena.

Option 2:

Participants will be able to “raise their hand” using the Zoom icon during the meeting, and they will have their microphone un-muted during comment portions of the agenda to speak for up to 3 minutes per item.

Option 3:

Email public comment(s) to PlanningComments@southpasadenaca.gov. Public Comments received in writing will not be read aloud at the meeting, but will be part of the meeting record. Written public comments will be uploaded online for public viewing under Additional Documents. There is no word limit on emailed Public Comment(s). Please make sure to indicate:

- 1) Name (optional), and
- 2) Agenda item you are submitting public comment on, and
- 3) Submit by no later than 12:00 p.m., on the day of the Planning Commission meeting.

NOTE: Pursuant to State law, the Planning Commission may not discuss or take action on issues not on the meeting agenda, except that members of the Planning Commission or staff may briefly respond to statements made or questions posed by persons exercising public testimony rights (Government Code Section 54954.2). Staff may be asked to follow up on such items.

PUBLIC COMMENT

1. Public Comment – General (Non-Agenda Items)

PUBLIC HEARING

2. Proposed General Plan Update, Downtown Specific Plan and Program Environmental Impact Report

State laws requires cities to periodically update their General Plan and zoning code to ensure orderly land development and conform with State laws. The City of South Pasadena has prepared a Draft General Plan, Downtown Specific Plan (DTSP), and Program Environmental Impact Report (PEIR). The Planning Commission will review and make a recommendation to the City Council.

The General Plan Update will apply Citywide. The DTSP will apply to the Fair Oaks Corridor, bounded by SR110 to the north and Bank Street to the south, and Mission Street Corridor generally bounded to the north by Hope Street and to the south by El Centro Street, and to the east by Brent Avenue and Indiana Avenue to the west.

A PEIR has been prepared for this project to analyze any potential effect on the environment pursuant to the California Environmental Quality Act (CEQA). A Notice of Availability was released on July 24, 2023.

Recommendation

Recommend that the Planning Commission receive the staff presentation prepared for the project, open the public hearing and take testimony, and then:

1. Direct staff to return to the Planning Commission on August 21, 2023, with a Resolution recommending that the City Council adopt and certify the Program Environmental Impact Report (PEIR) prepared for the project;
2. Direct Staff to return to the Planning Commission on August 21, 2023, with a Resolution recommending that the City Council adopt the General Plan and the Downtown Specific Plan (DTSP) Update;

- 3. Direct staff to return to the Planning Commission on August 21, 2023, with a Resolution recommending that the City Council update the South Pasadena Municipal Code by Ordinance to support the General Plan, the 2021-2029 (6th Cycle) Housing Element, and DTSP; and
- 4. Continue the public hearing to August 21, 2023.

ADMINISTRATION

- 3. **Comments from City Council Liaison**
- 4. **Comments from Planning Commissioners**
- 5. **Comments from Staff**

ADJOURNMENT

- 6. **Adjourn to the Special Planning Commission meeting scheduled for August 21, 2023.**

PUBLIC ACCESS TO AGENDA DOCUMENTS AND BROADCASTING OF MEETINGS

Planning Commission meeting agenda packets are available online at the City website: <https://www.southpasadenaca.gov/government/boards-commissions/planning-commission/test-planning-commission-agendas-minutes-copy>

AGENDA NOTIFICATION SUBSCRIPTION

Individuals can be placed on an email notification list to receive forthcoming agendas by emailing CityClerk@southpasadenaca.gov or calling the City Clerk’s Division at (626) 403-7230.

ACCOMMODATIONS



The City of South Pasadena wishes to make all of its public meetings accessible to the public. If special assistance is needed to participate in this meeting, please contact the City Clerk's Division at (626) 403-7230. Upon request, this agenda will be made available in appropriate alternative formats to persons with disabilities. Notification at least 48 hours prior to the meeting will assist staff in assuring that reasonable arrangements can be made to provide accessibility to the meeting (28 CFR 35.102-35.104 ADA Title II).

I declare under penalty of perjury that I posted this notice of agenda on the bulletin board in the courtyard of City Hall at 1414 Mission Street, South Pasadena, CA 91030, and on the City's website as required by law.

Matt Chang

8/3/2023

Date

Matt Chang, Planning Manager



Planning Commission Agenda Report

ITEM NO. 2

DATE: August 8, 2023

FROM: Angelica Frausto-Lupo, Community Development Director

PREPARED BY: Alison Becker, AICP, Deputy Community Development Director
Ben Jarvis, AICP, Interim Senior Planner

SUBJECT: **Consideration of a new General Plan, Associated Downtown Specific Plan, and Programmatic Environmental Impact Report (PEIR) Prepared for the Project, and Recommendations to City Council regarding the Plans and PEIR.**

Recommendation

It is recommended the Planning Commission receive the staff presentation prepared for the project, open the public hearing and take testimony, and then:

1. Direct staff to return to the Planning Commission on August 21, 2023, with a Resolution recommending that the City Council adopt and certify the Program Environmental Impact Report (PEIR) prepared for the project;
2. Direct Staff to return to the Planning Commission on August 21, 2023 with a Resolution recommending that the City Council adopt the General Plan and the Downtown Specific Plan (DTSP) Update;
3. Direct staff to return to the Planning Commission on August 21, 2023 with a Resolution recommending that the City Council update the South Pasadena Municipal Code by Ordinance to support the General Plan, the 2021-2029 (6th Cycle) Housing Element, and DTSP; and
4. Continue the public hearing to August 21, 2023.

Background

Sections 65300 et. seq. of the *California Government Code* requires each city and county adopt a comprehensive, long-term general plan for the physical development of land within its jurisdiction and sphere of influence. The City of South Pasadena (City) last updated its General Plan in 1998, with the Housing Element updated in 2014, and recent adoption of an updated Housing Element in May 2023. The existing Mission Street Specific Plan (MSSP) was adopted in 1996 as a companion document to the 1998 General Plan, and was tailored to the particular needs of a specific area of the City (Mission Street). The area covered by the MSSP is now proposed to be expanded to

include a segment of Fair Oaks Avenue. To better reflect the larger downtown area covered by the specific plan, the MSSP is proposed to be renamed the Downtown Specific Plan (DTSP). The General Plan and DTSP Adoption (Project) presents an opportunity to re-evaluate the City's values and community vision, address broader issues, and respond to the changing economic, environmental, legal, and social settings. The Project would also implement the housing programs included in the recently adopted Housing Element.

The recently adopted 2021–2029 (6th Cycle) Housing Element is one of the State-mandated elements required in a General Plan. The Housing Element identifies the City's housing conditions, needs, and opportunities; and establishes policies and actions (programs) that are the foundation of the City's housing strategy. Unlike other General Plan elements, State law requires each municipality to update its Housing Element on a prescribed schedule, most commonly, every eight years. The 6th Cycle Housing Element process commenced in the middle of the General Plan/DTSP Update process, which was commenced in 2014, substantially impacting the timeline and focus of the project. The COVID-19 pandemic also complicated the update process, particularly in terms of public meetings and outreach.

The comprehensive General Plan/DTSP Update is being undertaken by the City to strengthen its commitment to protecting the characteristics that make South Pasadena a desirable place to live, in the context of the constraints associated with significant changes in state law, particularly with respect to housing. The proposed General Plan and DTSP reflect an understanding of the community's current goals, address continued growth pressures in the San Gabriel Valley and the demand for more diverse mobility and housing choices, and respond to evolving regional and environmental issues. The General Plan/DTSP Updates serve as the City's guiding documents, providing the basis and policy framework for decision-makers. These documents provide direction regarding the physical development, resource conservation, and character of the City, and establish a realistic, non-residential (commercial) development capacity for the City. The 2021–2029 Housing Element serves as the policy guide for decision-making regarding residential development, and demonstrates how the City intends to comply with State housing legislation and regional requirements. As noted above, the Housing Element was adopted on May 30, 2023, in conjunction with an Environmental Assessment (EA) prepared pursuant to Government Code Section 65759. The proposed General Plan Update and DTSP are consistent with the adopted Housing Element.

Initial General Plan Update: 2014-2018

The existing General Plan was adopted in 1998, and the Mission Street Specific Plan was adopted two years prior, in 1996. Given the time that had passed, and that major elements such as the Metro A line (formerly the Metro Gold/Metro L line) and various residential developments had been completed, the documents needed to be refreshed. During strategic planning sessions in 2014 and 2015, the City Council identified the need to update the General Plan and the Mission Street Specific Plan, and directed staff to commence the update process.

On November 16, 2016, the City Council approved a contract with Rangwala Associates to update the City's General Plan and Mission Street Specific Plan. The Council directed staff to work with Rangwala Associates to prepare a Public Engagement Program as well as an Environmental Impact Report for the project. The public engagement process began on January 25, 2017, with a Joint City Council/Planning Commission meeting. During that meeting, staff was directed to expand the Mission Street Specific Plan boundaries to include Fair Oaks Avenue. Focus group meetings were held from February 2017 through April 2017, culminating in a charrette that was held during the last week of April. Focus groups reconvened after the charrette, and met through October 2017, developing policies and actions that would implement the community vision that was identified in the charrette and earlier focus group meetings. On November 8, 2017, the City Council directed staff to proceed with the Environmental Impact Report phase of the project, with the intent to release the draft EIR in summer 2018 and to formally adopt the EIR and updated General Plan and DTSP later that year. Based on the preliminary analysis, the proposed General Plan contemplated 500 additional residential units and 430,000 square-foot (SF) of new non-residential (commercial) space. Eventually, the General Plan would propose 589 additional units, and that number was used for the original environmental analysis and project assumptions in 2018/2019.

The majority of the work and community outreach that crafted the Draft General Plan and Downtown Specific Plan (DTSP) was completed in the 2017-2018 timeframe. The documents reflect the community's vision and goals that were identified at that time. The project's consultant, Rangwala Associates, conducted extensive public outreach, including stakeholder interviews, lectures, community surveys, and a charrette. This outreach was necessary to ensure the General Plan and DTSP reflected the community's vision and priorities. The community's comments were incorporated into the both the General Plan and DTSP documents, with the consensus being that future growth should be focused in walkable areas near public transportation thereby minimizing impacts on the City's established, single-family neighborhoods. Due to circumstances beyond the control of the consultant (the 2021-2029 Housing Element adoption process) Rangwala Associates transitioned off the project in 2019 and PlaceWorks, the new project consultant, assumed responsibility to finalize the General Plan and DTSP documents. Since PlaceWorks had been selected to complete the Housing Element, it made sense for a single consultant to coordinate final touches on the General Plan and DTSP documents to ensure they were internally consistent and complied with applicable state law. PlaceWorks remained the primary consultant until fall 2022. In spring 2023, Rangwala Associates again took over as the main project consultant for the proposed General Plan and DTSP Update project.

2021-2029 (6th Cycle) Housing Element

As the General Plan work effort progressed, the City commenced the 2021-2029 (6th Cycle) Housing Element adoption process. The initial General Plan contemplated 589 housing units; however, when the Regional Housing Needs Allocation (RHNA) numbers were released in 2019, the City was required to plan for 2,067 units, a substantial increase. The Housing Element is the only element in the General Plan that requires approval by the California Department of Housing and Community Development (HCD).

Given the increased number of units the City was required to plan for under its RHNA obligation, the City paused the General Plan/DTSP Update project. Given the difference in the number of planned units (589 for the initial General Plan versus the 2,067 units required under RHNA, it was prudent to pause the General Plan/DTSP Update until the Housing Element was approved and adopted.

After much work, and in part in response to housing element litigation, on May 17, 2023, the Planning Commission considered the Housing Element, the Initial Study and Environmental Assessment (EA) prepared for the project pursuant to Government Code Section 65759, public testimony, and other documentation, and adopted a resolution recommending the City Council adopt the EA prepared for the Housing Element, and approve the Housing Element. On May 16, 2023, the City received a letter from HCD stating the revised 2021-2029 Housing Element dated May 5, 2023, was found to meet the statutory requirements of State Housing Element law. With the recommendation of the Planning Commission and the determination by HCD that the Housing Element could be approved, on May 30, 2023, in a unanimous 5-0 vote, the City Council adopted the Housing Element. The Housing Element and its associated programs would accommodate a maximum potential of 2,775 units and 430,000 SF of non-residential (commercial) space. The additional number of units reflects a buffer of 708 units above the City's RHNA obligation. This buffer was required by HCD and provides additional housing capacity in the event some of the housing sites or programs do not produce the anticipated number of units. Full buildout of the Housing Element inventory would generate 6,882 potential additional residents in South Pasadena through 2040, along with 1,978 potential jobs; however, the actual number will likely be less than predicted as these numbers represent the upper limit to the City's growth potential. The General Plan, of which the Housing Element is one component, must be internally consistent, thus other elements of the General Plan must be revised to reflect the revised population and housing goals listed in the 2021-2029 Housing Element. Without large tracts of undeveloped land to work with, the City had to find a way to absorb the projected growth within its current built environment. Some growth could be accommodated in established neighborhoods through Accessory Dwelling Units (ADUs) or other State legislation that allows for additional by-right units on single-family lots, but even so, the City had to find ways to increase density in developed areas, preferably in commercial corridors located near high quality public transportation.

Litigation and Accelerated Timelines

In April 2022, the City was the subject of a lawsuit filed by Californians for Home Ownership, Inc. The lawsuit alleged the City was in violation of State law because the City had not adopted its 2021-2029 Housing Element by the State's statutory deadline of October 15, 2021. In August 2022, a Court Order, also known as a Stipulated Judgement, was issued requiring the City to take certain actions within certain timeframes in order to bring the Housing Element into compliance per Section 65754 of the Government Code. The Court Order, among other things, required the City to remove certain parcels from the Suitable Sites list.

As part of the Court Order and the Housing Element adoption process, environmental documentation pursuant to Government Code Section 65759(a) et. Seq. (which is separate from the CEQA process), was required. In keeping with Government Code Section 65759(a), an Initial Study and Environmental Assessment (EA) were prepared. The City was compelled to comply with the Court Order, requiring the City to approve the Housing Element by May 31, 2023. The City Council's adoption of the 2012-2029 Housing Element on May 30, 2023, was consistent with this legal deadline.

The City now has an approved Housing Element, but must still adopt an updated General Plan and DTSP, along with a zoning code update, that implement several programs identified in the Housing Element. The Court Order and applicable State law provide 120 days from approval of the Housing Element to adopt those documents and zoning amendments. The City is working to meet this mandated deadline, and intends to adopt the new General Plan, DTSP, and Zoning Ordinance no later than September 27, 2023. Upon adoption of the new General Plan, DTSP, and Zoning Ordinance, the City would be in compliance with State law and the Court Order.

Discussion/Project Description

The General Plan serves as the City's guiding document and constitution. No land use or policy decisions can be adopted that are not consistent with the General Plan. The proposed General Plan has nine chapters that seek to implement the community's vision for South Pasadena: 1) Our Natural Community; 2) Our Prosperous Community; 3) Our Well Planned Community; 4) Our Accessible Community; 5) Our Resilient Community; 6) Our Healthy Community; 7) Our Safe Community; 8) Our Active Community; and 9) Our Creative Community. These nine chapters contain goals, policies, and actions that provide guidance for the City's on-going operations and decision making. The General Plan, DTSP, and the Housing Element all work together to achieve the following objectives:

1. Provide sufficient capacity for housing development in compliance with State policy mandates. Address the shortage of housing for lower-income households and promote an inclusive residential environment that welcomes all people into the community.
2. Preserve natural areas, enhance parks and open spaces to provide enriching recreational opportunities and ensure access to those spaces for people of all ages and abilities.
3. Attract and retain high value, high-wage jobs within the creative sector, diversify the local economy, promote and support local businesses, increase local tax base to help fund vital public services.
4. Direct new growth to the downtown area along Mission Street and Fair Oaks Avenue, as well as opportunity sites such as the Ostrich Farm District, while ensuring the continued character of existing residential areas.
5. Develop clear and precise standards that offer predictable outcomes and processes.

6. Encourage pedestrian-oriented mixed-use development, while providing new and enhancing existing public spaces and gathering places, creating vibrant cultural hubs that weave creative expression into everyday life.
7. Provide safe access for all street users—pedestrians, cyclists, public transit users, and motorists—of all ages and abilities. Support an integrated multi-modal network and efficiently manage parking to support wider community goals.
8. Increase individual, institutional, and business capacity to survive and adapt to any chronic stress or acute shocks and be able to recover and thrive.
9. Create environments that encourage safe and healthy lifestyles and maximize the opportunities for physical activity. Design the public and semi-public realm to foster social interaction and develop good programming to draw people out of their homes and into the community.
10. Create a vibrant cultural center by weaving creative expressions into everyday life.

The General Plan Update seeks to preserve the City’s existing, distinctive neighborhoods, directing growth to focus areas, while providing enhanced housing opportunities citywide. Table 1 provides an overview of the development capacity for the focus areas:

Table 1 City of South Pasadena Development Capacity (2040)

	Size (acres)	Residential (DUs)	Non-Residential Commercial	Office
Focus Areas				
Corridors (within the Downtown Specific Plan Area)				
Fair Oaks Avenue	80	880	75,000	100,000
Mission Street		350	25,000	25,000
Districts				
Ostrich Farm	13.4	490	5,000	100,000
Neighborhood Centers				
Huntington Drive & Garfield Avenue	4.5	140	10,000	50,000
Huntington Drive & Fletcher Avenue	1.6	0	5,000	0
Huntington Drive & Fremont Avenue	7.4	60	10,000	25,000
Neighborhoods (Throughout Remainder of the City)				
High Density		455	0	0
Medium Density		350	0	0
Low Density		40	0	0
Very Low Density		10	0	0
			130,000	300,000
	Totals:	2,775	430,000	

Source: Table 2-3 from the PEIR (page 2-23)

The City currently has a population of 25,580, with 11,156 dwelling units (California Department of Finance, 2022). Under the proposed General Plan, along with the DTSP and Housing Element programs, the City would potentially add up to 6,882 new residents (32,462 total residents, 27% more than the existing population) and would add up to 2,775

new dwelling units for a total of 13,931 units, an increase of 25%. Commercial (retail) space would increase from 866,000 SF to 996,000 SF (a gain of 130,000 SF or 15%), and office space would increase by 300,000 SF (a 77% increase) from 390,000 SF to 690,000 SF.

General Plan Land Use Summary

The City's RHNA requirement was 2,067 units; however, as part of the Housing Element approval process, HCD required an additional buffer to ensure the required number of RHNA housing units could be accommodated. Therefore, the City is required to find capacity for 2,775 additional housing units. The proposed General Plan/DTSP Update would accommodate these units, directing development into urban corridors along major arterials, including the Downtown Specific Plan. Established single-family neighborhoods would be preserved to the greatest extent possible. The updated General Plan and DTSP would promote walkable, livable communities, where residents would not need to rely on automobile use for their daily transportation needs.

Adoption of the General Plan/DTSP is an important step in bringing the City into compliance with State law. Approval would also satisfy the Court Order which mandates adoption of these documents by September 27, 2023. Other aspects of the General Plan would be addressed at a later date, such as the provision to place a ballot initiative before South Pasadena voters in 2024 to consider removing the voter-approved height limit in certain areas and/or for certain projects. The goals, policies, and actions contained in the General Plan/DTSP support the kind of development identified by the community during the outreach phase of the project.

Land Use Designations Overview

The following paragraphs describe the land use designations that are proposed in the General Plan update:

Mixed Use Core

This land use designation encourages a wide range of building types depending on neighborhood characteristics. This designation applies to the vicinity of Mission Street in the DTSP, the Ostrich Farm area, as well as Neighborhood Centers on Huntington Drive. The development intensity would allow up to 70 dwelling units per acre with allowable buildings height up to five stories (assuming State Density Bonus provisions). Table 1 provides the estimated number of dwelling units and non-commercial space that could feasibly be situated within Mixed Use Core areas.

Very Low Intensity

This land use designation permits detached single-family homes and is characterized by lots over 10,000 SF. Development intensity is limited to three (3) units per acre, with a target height of one to two stories. Over the life of the General Plan, an additional 10 units are anticipated for Very Low Intensity-designated land. No non-residential uses (commercial) are anticipated.

Low Intensity

This land use designation permits detached single-family homes and is characterized by lots of 5,000 to 10,000 SF. Development intensity allows for up to five (5) units per acre, with a target building height of one to two stories. Over the life of the General Plan, an additional 40 units are anticipated for Low Intensity-designated land. No non-residential uses (commercial) are anticipated.

Medium Intensity

This land use designation permits attached housing types such as courtyard housing, townhomes, bungalow courts, and multiplexes. This designation also contemplates single-family homes on small lots. Development intensity allows for up to 30 units per acre with target building heights in the one to three story range. Over the life of the General Plan, an additional 350 units are anticipated for Medium Intensity-designated land. No non-residential uses (commercial) are anticipated.

High Intensity

This land use designation permits multifamily residential development, including multi-story apartments and condominiums. Development intensity allows up to 45 units per acre, with target building heights of one to four stories. Over the life of the General Plan, an additional 455 units are anticipated for High Intensity-designated land. No non-residential uses (commercial) are anticipated.

Civic

This land use designation pertains to those parcels that have public or quasi-public uses, such as government, arts, culture, education, recreation, transit, security, health, safety, and other institutional activities. Due to the nature and unique purposes of civic, public, and quasi-public buildings, development intensity is not defined in the General Plan. This makes sense given that Civic-designated land could contain uses such as religious facilities, schools, libraries, or public facilities like reservoirs and infrastructure. Development standards can/may be included in a revised Zoning Ordinance.

Parks & Open Space

This designation applies to land that provides public recreation, leisure, and visual resources. Parcels range in size from small “tot lots” and pocket parks that serve a specific community, to urban squares, public plazas, playgrounds, and large regional parks that serve the entire City. Given the unique characteristics and purpose of buildings in recreational areas, development intensity is not defined. Development standards can be included in the Zoning Ordinance.

Preserves

This designation applies to areas within the hills adjacent to existing established single-family residences. Preserve-designated land contains natural areas for the preservation of flora, fauna, geological, natural, historical, or similar features. No development intensity is listed for Preserves because no structures are contemplated for these areas. Development standards can be included in the Zoning Ordinance.

Table 2 provides an overview of the proposed land use designations. While the General Plan provides a broad description of the various land use designations, specific development standards are provided in the DTSP for properties within the DTSP area. The Zoning Ordinance will be updated to reflect development standards for parcels outside the DTSP area.

Table 2: General Plan Land Use Designations

Land Use Designation	Intensity		Vicinity/Notes
	Maximum Dwelling Units per Acre	Target Building Height (in stories)	
Very Low Intensity	3	1-2	Hillside areas and lower density, established neighborhoods
Low Intensity	5	1-2	Western and southern portions of the City, with some areas north of SR-110 and in the areas adjacent to the DTSP.
Medium Intensity	30	1-3	Various areas, including portions of Monterey Road, Huntington Drive, and neighborhoods near the DTSP area.
High Intensity	45	1-4	Various areas, including Raymond Hill, portions of Huntington Drive, Fair Oaks Avenue, Monterey Road, and Pasadena Avenue.
Mixed Use Core	70	1-5 ¹	Mission Street, Ostrich Farm, NW corner of Fair Oaks Avenue and State Street, and designated neighborhood centers on Huntington Drive.
Fair Oaks Corridor	110	1-7 ¹	Fair Oaks Avenue between SR-110 and Bank Street in the DTSP boundaries.
Civic	N/A	NA	Various areas: development standards can be included in the updated Zoning Ordinance.
Parks & Open Space	N/A	N/A	Various areas: development standards can be included in the updated Zoning Ordinance.
Preserves	N/A	N/A	Various areas: development standards can be included in the updated Zoning Ordinance.

Table source: PEIR Exhibit 2-4

¹Any building height in excess of 45' would be pursuant to State Density Bonus concessions or waivers. Any increase to the base building height of 45' would require a ballot measure and approval by South Pasadena residents.

Downtown Specific Plan (DTSP): Mission Street and Fair Oaks Avenue Corridors

Mission Street is the City's historic main street and contains some of its most important buildings, including the City's civic center. Fair Oaks Avenue is a major north/south arterial through the City. While Fair Oaks Avenue has remained economically viable, it has seen a decline in the quality of its urban environment due to the sprawl of buildings and lack of landscaping. By contrast, Mission Street has retained its historic character, particularly around the Metro A Line station. New infill development, along with successful retail businesses, have made Mission Street one of the most important destinations in the City.

The DTSP Update is a companion document to the General Plan and 2021-2019 Housing Element. The former Mission Street Specific Plan has been expanded to include Fair Oaks Avenue, and will be renamed the Downtown Specific Plan. The intention of the

DTSP is to build upon the success of the previous Mission Street Specific Plan. The new DTSP includes policies and strategies to preserve historic assets, encourage contextual infill development of vacant and underutilized parcels, create jobs, maintain/support existing compatible businesses, and accommodate housing for a variety of income levels. The DTSP fulfills and supports the goals, policies, and actions of the South Pasadena General Plan by promoting orderly growth and by utilizing existing infrastructure and services.

The DTSP is generally located along the Fair Oaks Avenue and Mission Street corridors. On Fair Oaks Avenue, the DTSP boundary extends from SR-110 on the north to Bank Street on the south, including most properties between Fair Oaks Avenue and Mound Street. The eastern boundary is defined mainly by the alley immediately east of Fair Oaks Avenue, as well as Brent Avenue in the vicinity of El Centro and Mission Streets. The Mission Street Corridor generally extends from Brent Avenue on the east to Indiana Avenue on the west, including properties on the south side of El Centro Street (roughly between the A Line tracks on the west and Brent Avenue on the east). The northern boundary follows Hope Street between Fair Oaks Avenue and Meridian Avenue, Magnolia Street between Meridian and Orange Grove Avenues, and the parcels on the north side of Mission Street between Orange Grove Avenue west to the vicinity of Indiana Avenue.

The DTSP contains two primary zoning designations: Mixed Use Core and Fair Oaks Corridor. The Mixed Use Core encompasses the vicinity of Mission Street and contemplates a development intensity of 70 dwelling units per acre with a height range of 1-5 stories (building height above 45 feet is subject to State Density Bonus concessions and waivers). The Fair Oaks Corridor allows for more intensive development with a maximum density of 110 dwelling units per acre. While the General Plan outlines development envelope standards such as allowable density and height, including provisions for taller building height in keeping with State Density Bonus concessions and waivers, the DTSP contains specific development standards under what is known as a “form-based code.” A form-based code provides objective development standards that aim to create an active streetscape and a walkable community, and these standards would apply to both Mission Street and Fair Oaks Avenue. The new DTSP contemplates a maximum of 1,230 additional units—880 units for Fair Oaks Avenue and 350 units for Mission Street—over the life of the plan (2040). The DTSP would also allow for up to 225,000 SF of new non-residential uses (commercial and office) with 175,000 SF anticipated for Fair Oaks Avenue and 50,000 SF for Mission Street.

As part of the Zoning Ordinance update, all references to the Mission Street Specific Plan will be replaced with the Downtown Specific Plan. Changes will be made to the applicable sections of the South Pasadena Municipal Code. Approval of the DTSP will supersede the existing Mission Street Specific Plan.

General Plan/DTSP Outreach

Public input played a key role in formulating the proposed General Plan and DTSP. The City’s team for the General Plan Update consisted of an Executive Team, an Advisory

Committee, and six Focus Groups. The Executive Team included key City staff members with a primary responsibility to keep the update process on schedule and within budget. The Advisory Committee included City Council members, Planning Commissioners, and department heads that provided on-going direction. Focus Groups supported the public outreach process in developing policy options and actions to implement the public's vision. The public outreach process included development of a project website, social media engagement, e-mail notifications, public surveys, pop-up workshops, stakeholder interviews, a lecture series, and a five-day visioning charrette. After a pause in preparation of the General Plan and DTSP Update documents, additional public meetings were held to provide the community with the current status of the Project and its path forward. The process was put on hold as the City awaited clarification of an anticipated significant housing allocation through the State RHNA process, which would likely be different than the housing capacity being considered at that time. When the RHNA was finalized at 2,067 housing units (actually, 2,775 units including the required buffer), necessary adjustments were proposed for the General Plan and DTSP Update, increasing capacity, including an affordable housing overlay, and revising the principles to reflect housing as a greater priority. More than 1,000 people participated in the General Plan/DTSP update meetings.

General Plan/Downtown Specific Plan Findings

SPMC Section 36.620.070(A) stipulates that a General Plan Amendment may be approved only if certain findings are met. The new General Plan follows the same process as a General Plan Amendment, meaning the following findings apply:

1. *The proposed amendment is internally consistent with the actions, goals, objectives, policies, and programs of the General Plan;*

The proposed General Plan update is internally consistent with the actions, goals, objectives, policies, and programs of the 2021-2029 (6th Cycle) Housing Element that was adopted on May 30, 2023. The current General Plan that was adopted in 1998 is not internally consistent with the recently adopted Housing Element. The Housing Element is one of the elements required by State law. Therefore, adopting an updated General Plan that implements the policies and programs of the 2021-2029 Housing Element would make the documents internally consistent. Therefore, the Planning Commission can make this finding in support of the Project.

2. *The proposed amendment would not be detrimental to the public interest, health, safety, convenience or general welfare of the City;*

The General Plan Update would not be detrimental to the public interest, health, safety, convenience or general welfare of the City because it would achieve internal consistency, including with the adopted 2021-2029 Housing Element. The General Plan Update also reflects substantial public comment, supporting a vision that was created by South Pasadena residents and community stakeholders. The General Plan will guide future growth of the City, and its goals, policies, and actions

will support the health and safety of residents. Two chapters of the General Plan, Our Safe Community and Our Healthy Community, specifically address the safety and health of City residents. The General Plan goals, policies, and actions further support the convenience and general welfare of the City by preserving existing single-family neighborhoods and focusing growth into specific areas where residents will have access to services and public transportation. The General Plan supports mixed-use, walkable neighborhoods, and provides the development capacity to accommodate projected future growth along with the housing programs identified in the Housing Element. Therefore, the Planning Commission can make this finding.

- 3. If applicable, the site is physically suitable (including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities) for the requested/anticipated project.*

The General Plan applies to the entire City of South Pasadena and would implement the policies and programs of the 2021-2029 Housing Element. Substantial work went into identifying the City's options in meeting its state-mandated housing allocations. As the proposed General Plan supports the adopted Housing Element, a document that applies citywide, the Planning Commission can make this finding.

As stated above, the Planning Commission can make all of the necessary findings listed in SPMC Chapter 36.620.070(A) to recommend the City Council adopt the new General Plan.

SPMC Chapter 36.440.050 (Processing and Review) states the City can adopt a Specific Plan in the same manner as required by State law for General Plans. The Planning Commission must make the same findings for the DTSP as it makes for the General Plan. The findings listed in SPMC Chapter 36.620.070(A), along with relevant discussion, are found below:

Pursuant to SPMC Section 36.440.060, the City Council may adopt a specific plan only if it makes the following finding:

1. The proposed plan is in conformance with the actions, goals, objectives, policies, and programs of the General Plan and other adopted goals and policies of the City;

The proposed DTSP is consistent with the actions, goals, objectives, policies, and programs of both the proposed General plan and adopted Housing Element. The DTSP envisions additional housing units and non-residential development potential within the City's urban core, and supports growth in commercial corridors and higher-density residential areas near the Metro A Line station and bus routes. Specifically, the DTSP would implement the following Housing Element programs: Program 2.a Provide Technical Assistance for Projects with Affordable Housing; Program 3.a Rezone and Redesignate Sites to Meet RHNA; Program 3.b Mixed-

Use Developments and Adaptive Re-Use; Program 3.n Zoning Changes; and Program 4.e Universal Design. Given the DTSP is internally consistent with the proposed General Plan and adopted 2021-2029 Housing Element, therefore, the Planning Commission can make this finding.

The DTSP also satisfies the requirements listed in SPMC Chapter 36.440.050(A-C), that requires environmental review, a staff report, and public hearings before both the Planning Commission and City Council. The Planning Commission can make all of the applicable findings to recommend the City Council approve the project.

Environmental Analysis

The General Plan/ DTSP Update constitutes a project under the California Environmental Quality Act (CEQA). As such, a Program Environmental Impact Report (PEIR) was prepared and was submitted to the California State Clearing House (document SCH No. 2018011050). The PEIR addresses issues raised in January 2018 when the first Notice of Preparation (NOP) was circulated, as well as issues identified when the Recirculated Notice of Preparation (RNOP) was distributed in April 2021. Public comments were also received in a scoping meeting that was held on February 5, 2018, and again from a virtual scoping meeting that was conducted on May 3, 2021. While two NOPs were distributed for the PEIR, the baseline for environmental analysis was assumed to be April 2021. Based on the scoping meetings, the following environmental areas of controversy were identified: traffic, parking, water supply, and waste water infrastructure.

Based on the analysis presented in the PEIR, implementation of the proposed General Plan/DTSP Update, along with the implementation programs contained in the 2021-2029 Housing Element would result in the following significant and unavoidable impacts after implementation of feasible mitigation measures:

1. Aesthetics (Visual Character at a program and cumulative level);
2. Air Quality (Air Quality Management Plan Consistency, Regional Construction and Operational Emissions Standards Violation, and Cumulative Emissions at a program and cumulative level; Local Construction Emissions Standards Violation at a program level);
3. Cultural Resources (Historic Resources at a program and cumulative level);
4. Greenhouse Gas Emissions (GHG Emissions at a cumulative level);
5. Noise (Construction and Exterior Traffic Noise Standards Violation at a program and cumulative level); and
6. Population and Housing (Population Growth at a program and cumulative level).

A Statement of Overriding Considerations is required documenting that the physical, social, and economic benefits of the General Plan and DTSP would outweigh the adverse impacts associated with the updated community vision and guiding documents.

Tribal Consultation

The General Plan/DTSP Update are both subject to tribal consultation under Assembly Bill (AB) 52 and Senate Bill (SB) 18. On March 13, 2018, the City initiated the offer of consultation by sending letters to applicable tribal representatives. Four tribes were contacted: the Gabrieleño/Tongva Tribe; Gabrieleño/Tongva San Gabriel Band of Mission Indians; Gabrieleño Band of Mission Indians, Kizh Nation; and the Soboba Band of Luiseño Indians. The tribal governments were also included in the original Notice of Preparation (NOP) that was dated January 18, 2018. The City received no response to its initial offer of consultation or the NOP in 2018.

On April 21, 2021, the City again initiated consultation under SB18 and AB52, due to the change in the General Plan/DTSP project and its associated Recirculated Notice of Preparation (RNOP). Consultation letters were sent to the Gabrieleño/Tongva San Gabriel Band of Mission Indians; Gabrieleño Band of Mission Indians, Kizh Nation; Gabrieleño/Tongva Tribe; Gabrieleño/Tongva Indians of California Tribal Council; and the Soboba Band of Luiseño Indians. One tribe, the Gabrieleño/Tongva San Gabriel Band of Mission Indians (Gabrieleño/Tongva Tribe), responded to the consultation request.

On June 10, 2021, the City met with the Gabrieleño/Tongva Tribe. The Gabrieleño/Tongva Tribe has ancestral ties to the South Pasadena area and is aware that Tribal Cultural Resources may be encountered as part of future development. Consultation concluded with the Tribe desiring to have the opportunity to participate in Native American monitoring if mitigation measures or conditions of approval require such monitoring in the future. There are no known Gabrieleño/Tongva tribal cultural resources within the Project area (South Pasadena City limits) beyond those that were listed on the Native American Heritage Commission (NAHC) Sacred Lands File search that was completed on July 15, 2020. The search was positive, meaning there are sites within the project area that are known to be significant/sacred to local Tribes. Results from the NAHC Sacred Lands File search are kept confidential to protect and preserve known sacred sites.

The Draft Program EIR is currently in the public review period, and comments on the environmental document can be submitted in writing through September 6, 2023. Thereafter, responses to comments will be prepared and a Final PEIR will be presented to the City Council for consideration and certification.

Pursuant to CEQA Guidelines Section 15025 (c), when an advisory body, like the Planning Commission in this situation, is required to make a recommendation on a project to the decision-making body, the advisory body must also review and consider the EIR in draft or final form. Given the time constraints, the Planning Commission is asked to review the PEIR in draft form and provide a recommendation for adoption and certification by the City Council.

Conclusion

Based on the evidence presented in this staff report, the Draft PEIR, and the adopted 2021-2029 Housing Element, the Planning Commission can make the findings to

recommend the City Council approve the Project. As such, two draft Resolutions will be prepared: A Resolution recommending adoption and certification of the PEIR, and a Resolution recommending approval of the project and adopting the new General Plan and Downtown Specific Plan. It should be noted that the Planning Commission will consider a proposed Zoning Text and Zoning Map Amendment in support of the General Plan and Housing Element on August 21, 2023.

Next Steps

In order to comply with State law and the Court Order, the General Plan, DTSP, and associated Zoning Text and Zoning Map Amendment, (including updates to inclusionary housing requirements, density bonus, employee housing, etc.) must be adopted by the City Council no later than September 27, 2023. Should the Planning Commission concur with the staff recommendation and give the direction as set forth in the recommendations at the beginning of this report, staff would proceed with the following:

August 21, 2023: Staff would return to the Planning Commission in a continued Public Hearing, with a Resolution to recommend the City Council certify and adopt the PEIR prepared the project, and another Resolution recommending the City Council approve the project. Staff would also present proposed Zoning Ordinance updates.

September 27, 2023: City Council conducts a Public Hearing and considers certifying/adopting the PEIR, and approving the project.

Upon Second Reading of the Zoning Ordinance, and the adoption of General Plan, Downtown Specific Plan, the City would be in compliance with State law as well as satisfying its legal obligations set forth in the Court Order.

Legal Review

The City Attorney has reviewed this item.

Public Notification of Agenda Item

A public notice for this Public Hearing was published in the South Pasadena Review on July 28, 2023. The public was also made aware of the Public Hearing through its inclusion in the legally publicly noticed agenda, posted physically at City Hall and also on the City's website.

As of the writing of the staff report, the City has received two comment letters on the project: one letter from the South Pasadena Tenant's Union and the other from South Pas Active Streets. The letters expressed concerns on ensuring affordable units are built, the need for a viable economic strategy, the focus on creative placemaking, and prioritizing pedestrian and bicycle safety. Staff has also received verbal comments concerning the need for flexibility in the DTSP's form-based standards given the characteristics of specific parcels. The comment letters are attached to this report.

Attachments

Draft Program Environmental Impact Report

Draft General Plan

Draft Downtown Specific Plan

Draft Downtown Specific Plan Section C10 Administration

Public Comments

ATTACHMENT 1

Draft Program Environmental Impact Report ([Link](#))

ATTACHMENT 2

Draft General Plan ([Link](#))

ATTACHMENT 3

Draft Downtown Specific Plan ([Link](#))

ATTACHMENT 4

Draft Downtown Specific Plan Section C10 Administration

10.1 ADMINISTRATION

A Review Authority

This Section of the Downtown Code identifies the responsible body or individual that has the responsibility and authority to review and act upon applications submitted to the City within the Specific Plan boundaries.

B Applications

1. **Non-Residential Projects.** Projects that do not include residential uses shall be subject to the applicable application requirements and approval processes as set forth in Division 36.400 of the Municipal Code unless otherwise established in the Specific Plan.

2. Residential and Mixed-Use Projects.

i. Ministerial Approvals.

(a) Projects meeting the following criteria shall be subject to ministerial approval by the Community Development Director:

(1) Any residential or mixed-use project with ten or more residential units that provides affordable housing in compliance with the City's Inclusionary Housing Requirements (Division 36.375 of the Municipal code.

(2) Any residential or mixed-use project with nine or fewer residential units in which at least twenty percent (20%) of the units are affordable to lower income households.

(b) The Community Development Director shall develop an application for ministerial approvals pursuant to this paragraph, and procedures for processing applications for the ministerial approvals. The procedures may include a limited design review process and applicable standards; however, any limited design review process shall not constitute a "project" for purposes of the California Environmental Quality Act.

(c) If a project qualifies for ministerial processing pursuant to this Section (i), review of any density bonus application, including any requests for incentives or concessions, waivers, reduced parking requirements, shall be reviewed ministerially.

(d) If a project qualifies for ministerial processing pursuant to this Section (i), the project shall be exempt from any requirement for a Certificate of Appropriateness pursuant to the Municipal Code, unless the project site is in a designated and adopted historic district or is a designated historic resource on the National Register, State Register, or South Pasadena Register of Landmarks and Historic Districts.

ii. Discretionary Applications: Any residential or mixed-use project that is not subject to a ministerial approval pursuant to the foregoing Section (i) shall be subject to the applicable application requirements and approval processes as set forth in Division 36.400 of the Municipal Code

3. Project applications shall be reviewed within 30 days of submittal and either deemed complete if all application information and materials have been provided, or deemed incomplete if missing information and/or materials have been identified. Once complete, project applications shall be reviewed in compliance with the Permit Streamlining Act.

C Special Exception Process

The purpose of a special exception is to allow projects that provide special amenities, design details, and/or aesthetic benefits to the community. If a special exception is requested, it will be processed pursuant to the procedures for Administrative Modifications found in Municipal Code Section 36.410.060. The application shall include a full description and explanation of the proposed project component that is the subject of the request, and shall provide justification based on the findings below.

Required Findings for Special Exceptions

Before a Special Exception may be granted the following findings must be made:

- i. The proposed project, while not consistent with a specific provision of this code, is justified by its intent to pursue a comparable or better designed development;
- ii. The proposed project would result in development compatible with the scale and character of existing development in the vicinity; and
- iii. The proposed project would result in development that is not detrimental to and would not adversely impact adjacent properties.

Limitations: Applications for Special Exceptions shall be limited to exceptions to building placement, lot size, building types and frontage types.

D Preliminary Review Process

The purpose of the preliminary review process is to allow an applicant to submit a preliminary plan and receive comments from the City prior to formal submittal. Applicants proposing new construction are highly encouraged to request Preliminary Review early in their planning process. There is a "pre-application meeting fee" associated with this consultation.

ATTACHMENT 5

Public Comments

From: South Pas Active Streets <info@southpasactive.org>
Sent: Tuesday, August 1, 2023 2:08 PM
To: CDD <CDD@southpasadenaca.gov>
Subject: Comment on draft General Plan

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 the City of South Pasadena,

South Pas Active Streets (SPAS) is a community organization working to strengthen our city by improving walkability and bikeability. We believe that every part of the city should be safe and accessible to people of all ages and abilities, and we aim to achieve that goal through community programs and advocacy.

The recent draft General Plan of South Pasadena includes numerous goals, policies, and actions that are relevant to the SPAS mission. Here, we include comments on specific items posted at <https://www.southpasadenaca.gov/government/departments/planning-and-building/general-plan-downtown-specific-plan-update> (July 17 version).

We support the Plan goals of improving safety for walkers and cyclists in our city. Policies 4.1, 4.2, 4.4, 4.6, 4.7, 4.10, and 6.2 (and accompanying actions) are all positive developments for walkers and bikers. This, in turn, supports our goals for sustainability and improved quality of life for South Pasadenans. We thank the city for the inclusion of these Policies.

We oppose the following items:

-
-
- P4.3 includes language about increasing
- enforcement of traffic laws and is identified with the Social Equity lens. We feel that enforcement should focus on reducing harm in our community, which is disproportionately done by motor vehicles and disproportionately harm on people of color. The language
- in this item implies that pedestrians and cyclists are causing equal harm, which is demonstrably false. Supporting a more inclusive and sustainable community will require reducing harms caused by motor vehicles and this item should state that explicitly.
-
-
-
- A4.5c refers to modifications to
- the “bulb-out” curb extensions on Fair Oaks Avenue and is identified with the “Aging in Place”, “Social Equity” and “Vision Zero” lenses. First, we find inclusion of a specific, ongoing project in the Plan odd. For example, what does “proceed” mean in this
- context, given that this planning document does not discuss the status of this project? Second, bulb-outs are street design elements that slow automotive traffic and improve pedestrian safety, which are explicit goals of other parts of the Plan. Their purpose
- is to make it easier and more comfortable to cross the street, which makes the
- **inclusion of bulb outs**
- well aligned through the lens of “Aging in Place” for seniors or those with disabilities, who have difficulty crossing streets. “Social equity” is advanced, as people of color are disproportionately impacted by traffic violence. “Vision Zero” goals explicitly
- add elements such as bulb-outs to busy intersections. Advocating for **removing**
- bulb-outs with the lens of “Aging in place”, “Social equity”, and “Vision zero” is offensive and undermines confidence in this planning process. Those labels should all be removed. Given the misalignment of this item with these perspectives, as well as other
- policies in Section 4 of the Plan, we ask for this action item to be removed.
-

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-
- P4.9 refers to “reducing traffic
- congestion” and associated actions are identified with a “Vision Zero” lens. This Policy is primarily concerned with increasing investment in the convenience of motor vehicles. This transportation mode already draws a disproportionate amount of our city's
- money and resources, despite great cost to our environment through carbon emissions and other air pollution, in addition to traffic violence. This item should be removed entirely, as it directly undermines the central goals of safe and sustainable living.
- The
- items A4.9a and A4.9b, as described, do not promote “vision zero” goals and those labels should be removed.
-

We thank the city for creating an open process for defining the goals and actions for our community. Please let us know if we can provide any more information to support our comments here.

Sincerely,
South Pas Active Streets
info@southpasactive.org



July 29, 2023

To: Community Development Department, City of South Pasadena
Planning Commission, City of South Pasadena

From: South Pasadena Tenants Union

Re: 2023 Draft General Plan

Dear Community Development Staff and Planning Commissioners:

I am writing in response to the most recent draft of the General Plan. Due to a lack of member availability, SPTU was unable to attend the community forums.

At the request of CDD, I met with Mr. Rangwalla on behalf of South Pasadena Tenants Union, on June 1. In this meeting I reviewed past concerns and updated our input. Of the items discussed were parking, economic development and adherence to the Housing Element and RHNA. I said that after six years, the General Plan would need more than a few updates if not a complete revision, being incredibly out of date.

I reiterated our support of the Housing Element that includes a ballot measure to repeal restrictive building heights, the removal of the current parking requirements, and the inclusion of measures to protect and preserve existing affordable housing. I was surprised to hear Mr. Rangwalla start off our conversation by saying that the city will never build all the housing that it is proposing in the Housing Element. I responded by saying our expectation is that City makes compliance with the State a priority and does everything in their power to assure that those units of affordable housing are delivered.

I also stated that there is no lack of parking in South Pasadena. It is rare that one is not able to find a parking place anywhere in South Pasadena that is not convenient to where it is that they are going. This might happen once or twice a year during special events like the 4th of July parade or The Eclectic Music Festival. If we claim to promote ourselves as a walkable city committed to green policies and practices, it is illogical to be obsessed with having to have an over-abundance of parking. Additionally, I restated our lack of support for the overwhelming investment in creative placemaking as the singular focus of economic development.

In review of the current draft, we find that this General Plan lacks a viable strategic vision for the future of our city. It fails to incorporate modern concepts and trends in all areas except for climate action. That being said, the progressive climate action plan is negated by restraints on economic development and housing development.

Our Creative Community

In SPTU's public comments on the previous Draft of the General Plan, we questioned the viability of an economic development strategy based solely on investment into the formation of a creative placemaking centered economy. In my meeting with Mr. Rangwalla, I stated that it would be more prudent to attract information technology or bio engineering companies. We also question the wisdom of segregating large employers to the Ostrich Farm district given the distance to the Metro station.

Mr. Rangwalla used Bullseye Glass as an example of a thriving local creative based business located in the Ostrich Farm district. Bullseye Glass Company is headquartered in Portland, Oregon where it was originally founded. While they do employ over one hundred staff companywide, the figure is not large enough to indicate that their presence in South Pasadena justifies bustling creative based economy is feasible. According to Zippia.com, employer statistics and demographics for Bullseye Glass Company lists their employees as being primarily white at 71% and male, at 78%. Bullseye Glass, while a lovely company, does not represent an ideal model of a 21st century California industry and an arts-based economy is not the basket in which we should put all our eggs.

In a cursory search of industry clusters providing the most revenue growth for LA county are healthcare and health services, construction, information technology, clean energy and transportation, digital media technology (Artificial Intelligence), manufacturing, fashion, trade and logistics. The General Plan has many pages dedicated specifically to investment in "Our Creative Community" and nothing else. No one would ever advise an investor to put all their 401k in one stock, so why would our city do that with our future economy?

It is my understanding from participation in the both the charettes and community forums in 2019, that this arts-centric direction is in response to input collected from what is now a shrinking demographic of South Pasadena residents that is primarily white and affluent. Local, regional, state and national demographics, economics, urban planning and housing production and arts funding priorities have changed dramatically since the charettes took place thus rendering this paradigm outdated. Nationwide, the businesses that did not survive the pandemic within the top five are arts and live entertainment. This suggests that implementing "Our Creative Community" as an economic driver is reckless. When there are world class art centers eight miles away in Downtown LA such as The Broad, The Music Center, Grand Park, MoCA, LA County Library, the museums at Exposition Park and a vibrant gallery, music, entertainment and restaurant scene, would South Pasadena realistically be able to compete for those art grants and tourism dollars? If so, how much time and investment of tax dollars would it take to compete?

The General Plan assumes that industry and arts tourism will be drawn to South Pasadena despite there being limited retail, restaurants, lodging, housing opportunities at all levels or an urgent care center to accommodate an influx of workers and visitors. Dynamic companies like those that South Pasadena should be striving to attract will require convenient housing options for their workforce. Cities, like Culver City and Santa Monica appeal to burgeoning industries including digital media and online entertainment, because workers can live car free. Housing, retail, food services, healthcare services and tenant protections were developed to meet the needs of younger, racially and culturally diverse workers. Housing and services are all within walking distance of workplaces and are easily accessed by bike, e-

scooters or ride share. South Pasadena offers none of these benefits and the zoning proposed in this draft General Plan is prohibitive of such development and policy creation.

We would like to see the following information included in the General Plan:

- Data that demonstrates the benefit and sustainability of creative placemaking as an economic development strategy. This should include an analysis of art funding from the Federal government and state for which South Pasadena would qualify.
- Zoning ordinances that support the transition of a small affluent city as a destination for diverse employers, workers, commerce and visitors.
- Budget projections demonstrating that the City's general fund will be able to support creative based economic development over the next decade.
- Sampling of costs to taxpayers over the course of the GP to sustain the proposed creative community economic model. This would include the staff to research and prepare grants, manage and track results of grants and oversee outcomes of contracts provided to SPARC, the Chamber of Commerce and other community-based organizations.

This next points are of considerable importance to South Pasadena Tenants Union:

- P.9.2 Page 188 - Develop and market spaces for artists including studios, affordable housing, and live/work studios.
 - Please explain how the city proposes to a) define "artists", b) how the City proposes to earmark the creation of affordable housing to "artists" and c) how this proposal aligns with HUD guidelines for affordable housing and Fair Housing.
- Building heights for the Mission/Fair Oaks corridors correspond with those stated in the Housing Element. It is our understanding that the City is obligated to conduct a ballot measure on the repeal of the existing building height restrictions but where does it explain this in the draft General Plan? The draft leads the public to believe that building heights will forever remain at three stories and four stories on Fair Oaks. It is this type of inconsistency in our public documents that angers residents on both sides of the issue. Given that SPTU, wrote a good faith letter of support to HCD for the 5th Draft Housing Element, we are afraid that the incongruities on building heights, the size of required courtyards and parking requirements, and the statement by Mr. Rangwalla that South Pasadena will not meet the RHNA numbers, will jeopardize the certification. With the General Plan draft contradicting the Housing Element in these areas, SPTU is rightfully concerned that the city may also attempt to skirt tenant protections.

We thank you for your consideration of our comments and look forward to seeing a revised General Plan that better addresses our ongoing concerns, aligns with the Housing Element and upholds HUD and Fair Housing guidelines. We will be closely monitoring the progress of the General Plan going forward.

In solidarity with workers and tenants everywhere,



Anne Bagasao

For South Pasadena Tenants Union