



Community Development
Department

Memo

DATE: August 21, 2023

TO: Members of the Planning Commission

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

RE: Additional Documents, Item No. 3, Public Hearing—Proposed General Plan Update,
Downtown Specific Plan and Program Environmental Impact Report

Please find the following attachments pertaining to this evening's Planning Commission meeting:

Attachment 1: Written comments that were received by 12:00 p.m. on August 21, 2023.

The information has been attached for the Planning Commission's information.

From: [Carol](#)
To: [PlanningComments](#)
Cc: [CCO](#)
Subject: Regarding the Draft General Plan, Downtown Specific Plan (DTSP), and Program Environmental Impact Report (PEIR)
Date: Sunday, August 20, 2023 9:58:28 AM

Comments to Planning Commission,

I am against the recent changes to the New General & Downtown Specific Plan Proposal, which appears to have the goal of eliminating all commercial uses in order to double the population and increase the scale of buildings with heights up to 8 stories in our city! Exceeding RHNA numbers by razing our popular businesses will turn South Pasadena from a wonderful place we currently enjoy, and into a hell-scape of poor planning.

I understand you are under the gun of the whole crazy state-mandated new-build RHNA unit demands that we have to meet as a city, but whose idea is it to voluntarily commit "citi-cied" by **multiplying** the already unsupportable density demands the state has made by a factor of six? A buffer of planning for 2,500 units under the circumstances is understandable, but going from the required 2,067 units demanded by the state, to *over* **13,000** is suicidal for the functioning of our city.

Currently South Pas has a "very walkable-friendly" rating hovering around 85/100, meaning you can reasonably walk to almost any of the business destinations where you wish to shop in town. But demolishing much needed businesses in order to build monstrous sized apartment and condo units destroys what makes this town special.

Not only will this current plan create nightmarish traffic, forcing us into our cars every time we need to shop, having to travel greater distances to *other* cities just to purchase groceries and hardware items etc., but this also goes against council member Cacciotti's (hopefully honestly??) stated goals of reducing pollution and fighting climate change.

Does this version of the Draft General Plan actually call for the demolition of Pavilions, Ralph's, Bristol Farms an Ace Hardware along with the surrounding stores????!! How did these changes get snuck into the plans without residents being able to vet them before having to meet your deadline for comments by 12 noon this Monday?

I'd like to know who's behind this insanity. Residents need to be told that if you approve this plan, **once you up-zone, there is no going back.** By right, developers will be able to build **all of the 13,000** units you have allocated, and...they ***will***.

The goal of a planning commission should be that of improving a town, not destroying it!

Sincerely shocked,

Carol Kramer
South Pasadena, CA

From: [Steve Koch](#)
To: [PlanningComments](#)
Cc: [CCO](#)
Subject: Draft Plan and Downtown Specific Plan Feedback
Date: Sunday, August 20, 2023 1:19:27 PM

City Planning Commission,

I am strongly opposed to the changes to the New General Plan and the Downtown Specific Plan that are being proposed.

Is anyone working for the good of the citizens of South Pasadena anymore? These changes go FAR BEYOND what is being mandated by Sacramento and RHNA numbers, and would be detrimental to South Pasadena as a wonderful liveable oasis in the San Gabriel Valley.

The City Planning Commission needs to go back to the drawing board and come up with a reasonable response to Sacramento that goes no further than what is mandated - Sacramento's mandates are bad enough.

South Pasadena needs to retain a balance of residential and commercial properties to sustain itself. Proposing to eliminate Pavillions, Ralphs, Bristol Farms, Ace and the stores that surround them to make room for housing is outrageous.

We shouldn't be planning for how to double the housing units and population of the city.

We shouldn't be allowing the tripling of allowable densities to our medium and high density areas.

We shouldn't be raising the maximum building height limits and number of allowable stories on residential buildings.

The City Planning staff is completely out of touch with the wants and needs of the residents of our city who came to South Pasadena, in large part, for it's charm and small town feel. These are the very things that you are unwittingly destroying when you submit a proposal like this.

It's my understanding that once zoning changes like these are implemented that **there's no going back**. These changes must be stopped and a more reasonable response to Sacramento must be sought.

Steve Koch
Grand Ave resident

CC South Pasadena City Council

From: Joe Potts
Sent: Sunday, August 20, 2023 2:13 PM
To: CDD
Subject: General Plan and Downtown Specific 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.

General Plan and Downtown Specific Plan Public Comment-

I am vehemently opposed to your proposed plans calling for:

- ☒ Doubling our City's population from 26,314 to over 50,000.
- ☒ Doubling the number of units in our City from existing around 11,000 units to over 24,000 units.
- ☒ Six times the State required 2,067 units to a total of 13,000 proposed additional units.
- ☒ Tripling or more the allowable density of our medium and high density areas from the current 14 and 24 units per acre to 50 and 70 units per acre and in some cases on Fair Oaks, 110 units per acre.
- ☒ Doubling the allowable height of new multi-family buildings from the current 3 to 4 stories to 7 to 8 stories.
- ☒ Exceeding our voter approved height limit of 45 ft. (4 stories max.) by an additional 30 to 40 ft..
- ☒ Demolition of any existing commercial use for multi-family residential buildings. Specifically calling for the demolition of Pavilions, Ralphs, Bristol Farms and Ace Hardware and surrounding stores JUST MEET THE MINIMUM STATE REQUIREMENTS

Joe Potts
30 year South Pasadena resident
Meridian Ave

From: [Anthony Lai](#)
To: [PlanningComments](#)
Subject: Concerns Regarding the Proposed General Plan/Downtown Specific Plan Changes
Date: Sunday, August 20, 2023 5:38:34 PM

Dear South Pasadena Planning Commission,

I write to you today, as a concerned resident of South Pasadena, to express my profound apprehension regarding the proposed changes to our city's General Plan and Downtown Specific Plan. The essence of South Pasadena, with its rich history and charming character, is on the verge of being eroded by these sweeping changes.

The proposals, which were added just a month prior to the draft issuance without proper public vetting, plan to drastically alter the character and dynamics of our beloved city. The anticipated doubling of our city's population and housing units raises grave concerns about overcrowding, traffic congestion, infrastructural strain, and an overall degradation of the quality of life that South Pasadena residents have come to cherish.

Moreover, the proposed increase in housing density and the height of new multi-family buildings not only exceeds the voter-approved height limit but also stands in stark contrast to the existing architectural landscape of our city. Such sudden and drastic changes will invariably overshadow the unique charm and heritage of South Pasadena.

Furthermore, the demolition of commercial landmarks such as Pavilions, Ralphs, Bristol Farms, and Ace Hardware, along with other businesses, is alarming. These establishments have been integral to the community, and their replacement with multi-family residences is a considerable loss to our city's commercial vibrancy and diversity.

In comparison with neighboring cities like San Marino and Pasadena, the proposed housing numbers for South Pasadena seem disproportionately high, especially given our city's smaller geographic footprint. It begs the question, why such a drastic and aggressive development approach for South Pasadena?

I urge the Planning Commission to deeply consider the ramifications of these proposed changes. Our city is a testament to history, culture, and community bonding, and it is paramount that any changes we make are done with a vision that preserves and enhances these very attributes.

Thank you for your time and consideration. I trust that the Planning Commission will prioritize the best interests of South Pasadena and its residents.

Sincerely,

Anthony Lai
Resident

From: [Patricia Rose](#)
To: [PlanningComments](#)
Cc: cco@southpasadena.gov
Subject: Increasing RHNA units demands of 2,067 units to over 13,000
Date: Sunday, August 20, 2023 11:51:16 PM

On January 6, 2012, State Superintendent Tony Thurmond announced California Distinguished Elementary Schools. South Pasadena's three elementary schools--Arroyo Vista, Marengo Elementary, and Monterey Hills made the list based on their assessment results. These excellent assessment results would not have been possible in overcrowded classrooms where teachers do not have the time to attend to individual student learning and assessment.

How will increasing the RHNA unit demands of 2,067 units to over 13,000 affect student learning and achievement? South Pasadena has 1 high school, 1 middle school, and 3 elementary schools. Obviously class size must increase to accommodate the influx of new students unless South Pasadena intends to build more schools. Larger class size means less teacher time devoted to each student and more multiple choice testing to assess student learning. I know because for 25 years, I was a full time English professor at Pasadena City College. English professors fought for years to reduce the class size of its writing classes from 35 students to 25 students per class. This reduction of class size meant students did more academic writing and instructors gave more individual attention to their thinking, research, and writing skills. Do the research--smaller class size means more instructor time per student and a higher rate of student success.

Both of our children attended South Pasadena schools. In fact, we moved to South Pasadena *because* of its excellent public schools. Our children did in fact receive an excellent education and are now practicing attorneys. One has already made partner at her law firm while my son is an attorney for Amazon Web Services. I truly believe that their academic success in college and law school stems from the individual attention they received from their teachers in South Pasadena schools.

How will our 3 elementary schools, 1 middle school, and one high school accommodate this influx of more students? How will an increase in class size affect student learning and achievement? I guess teachers could accommodate more students in each class by giving multiple choice tests. Think carefully before you increase the 2,067 units demanded by the state to over 13,000 if you care about the education and future of our students.

Patricia Rose
625 Meridian Avenue
South Pasadena, CA 91030

From: [joshraymd](#)
To: [PlanningComments](#)
Subject: Planning commission housing element
Date: Monday, August 21, 2023 4:24:08 AM

I will once again complain about how the zoning presented today does not line up with the zoning in the housing element that was approved by HCD. The general plan and downtown specific plan incorporate a 45 foot height limit and say that sometime in the future we will change it. The zoning you are adopting should actually have that zoning that was in the housing element written out.

When staff presented the housing on my plan to myself into you guys, they both said something vastly different than what is being presented to you today. Commissioner Lesak even asked about the height on Mission Street and at the time staff told him that would be seven stories.

That is also what they told that to HCD. You spent two years fighting about the 45 feet and somehow staff thinks it's all right to put it in the downtown specific plan and general plan today.

This will be rejected by HCD, and come October, two years after your deadline, you will still not have a complaint housing element.

Regardless, due the A.B. 1398 and you guys being more than a year after the deadline when you got your housing element approved by HCD, you cannot be considered compliant until after all the rezoning has been completed. This includes lifting the height limit. So South Pasadena has another year and a half minimum where they can be sued for not having a complaint housing helmet, and the builders remedy is viable.

Because your staff broken promises to myself, others, and the South Pasadena Tenants Union this makes another Housing Element lawsuit for not having a compliant housing element highly likely. When the next lawsuit happens you cannot say that you didn't see it coming.

From: Casey Law
Sent: Saturday, August 19, 2023 7:40 AM
To: CDD
Subject: Comments 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.

Dear City of South Pasadena,

Thank you for developing and sharing the General Plan. I have read it carefully and have comments on some items here. I've noted the items with the code used in the Plan (A for action, P for Policy, etc). My comment is indented after each line that summarizes the action or policy.

- A4.8b – Require that development projects achieve no net increase in Vehicle Miles Traveled (VMT) per capita above current levels for comparable uses in the City of South Pasadena as determined in accordance with the City's Transportation Impact Analysis (TIA) Methodology (updated May 5, 2020).
 - This methodology reserves the use of TOS (an auto-centric metric) in some planning. TOS often motivates higher VMT and unsafe pedestrian and cycling environments. TOS should not be used in planning.
- P4.9 – Reduce traffic congestion by modification of traffic signals, turning improvements, and other operational changes that do not require increasing the width of rights-of-way or adding lanes to streets
 - This item is largely focused on improving efficiency of automotive users. Our budget is disproportionately allocated to the convenience and speed of automotive users. This comes at great cost to our environment, through carbon emissions and other air pollution, and to non-auto users of our streets, through traffic violence.
 - This item should be removed entirely, as it directly undermines the central goals of safe and sustainable living.
 - This item and the local circulator bus are both very expensive. Given limited funding options, the circulator bus is an investment that actually moves us to a more sustainable community.
- The items A4.9a and A4.9b, as described, do not promote "vision zero" goals and those labels should be removed.
- P2.9 – Adopt creative parking strategies Downtown and utilize public parking as a revenue source.
 - Reducing and charging for parking are a great way to incentivize pedestrian friendly environment and support local businesses.
- P3.3 – Conserve residential hillside neighborhoods
 - Every action under this topic is labeled with the to "Social equity" lens. I do not think that controlling development or preserving open space in the most exclusive neighborhoods helps meet social equity goals. A more effective way to do this would be by improving and expanding parks and open spaces near more affordable housing stock.
 - I ask that the Social equity lens filter be removed from all of the P3.3 actions.
- A3.5b – Consider seeking voter approval to raise the 45 feet height limit.
 - The city height limit restricts development of housing city wide and mixed use buildings in the core. Our city would have more opportunities for businesses, be more walkable,

and more fun without a height limit in its core areas (including Ostrich Farm, Huntington, and the downtown area)

- Section 8 (“Our Active Community”)
 - The city swimming pool is in high demand, even though it has no web site and people often assume it was built for the high school. The city should consider building some other water play facility elsewhere in the city.
 - This would help our community stay cool as our climate warms. Heat emergencies impact younger and older residents most. International standards recommend placing cooling centers or pools within 15 minute walk of all residents. Currently, that is not possible for residents on the west side of South Pasadena.
 - Orange Grove Park, is a 15-minute walk from most residents west of downtown. That park is not as fun as Garfield Park; a water play space could really make it a destination.
 - It is important to note that the city had a public pool at Orange Grove Park (“the plunge”), but it was closed to avoid racial integration in the 1950s. The city has acknowledged that closure was wrong and committed itself to addressing this historical injustice. Building a new, accessible water facility in would demonstrate our commitment to correcting that mistake.
 - Alternatively, a swimming pool in Ostrich Park could support the vision of building a new community center, including businesses and residences there. Currently, the main public amenity there is in the Arroyo, which is difficult to reach. A pool within walking distance of new developments would be accessible and help create a community space.

Please let me know if I can expand or clarify any points made here.

Sincerely,
Dr. Casey Law
Commissioner, South Pasadena

From: [Preston Rose](#)
To: [PlanningComments](#)
Subject: New General Plan
Date: Monday, August 21, 2023 9:29:57 AM

To the Planning Commission

I am writing because it is my understanding that South Pasadena's New General Plan and Downtown Specific Plan proposes perhaps a doubling of the population and a dramatic increase in the size and scoop of new apartment buildings, and promoting density over commercial activity. I support the concerns of many of my neighbors that the proposed changes may be excessive. I want to support careful, measured development in the city that seeks to preserve South Pasadena's small town character. Others have articulated these arguments better than I, so I would rather point to one issue that I feel has probably been left out by all parties.

There is much talk of the "walkability" of the city, but I, as a daily walker throughout the city, see that little planning beyond sidewalks has been done for pedestrians. For example, the city is cut by two major north-south roads, Fremont and Fair Oaks, and two east-west highways, Monterey and Mission. This tic-tac-toe pattern cuts the city into cubes and joins them at four treeless, crowded, wide intimidating traffic-light controlled intersections. Is navigating these intersections part of what we call "walkability"? Has any thought been given to making the "walkability" of the city easier for the pedestrian? Pedestrians need dedicated paths and walks. They need large and more aggressive crosswalks, including both right angle crosswalks and diagonal crosswalks at four-way stop intersections. Finally, at the busiest intersections and commercial districts in the city, there should be a complete separation of cars and pedestrians, even to the extent that section of the road would be dedicated entirely to pedestrian traffic.

Growth and development are inevitable. The challenge is to have the development enhance and extend the good qualities of the city. Making the pedestrian and "walkability" important factors in the development will help mitigate the effects of growing density.

Thank you,

Preston Rose

625 Meridian Avenue

South Pasadena, CA 91030



August 21, 2023

On March 24, 2023, South Pasadena Tenants Union wrote to HCD in support of the 5th Draft Housing Element submitted by the City of South Pasadena. Most recently, South Pasadena released their General Plan and Downtown Specific Plans for public comment. In review of the drafts, SPTU has found discrepancies from what is committed to in the Housing Element.

The General Plan and Downtown Specific Plans illustrate building heights in the Mission Street corridor as remaining at 3-stories. Building heights on the Fair Oaks corridor, show at 4-stories. The Housing Element that was submitted to HCD, shows on Page 232, the following under the heading of Additional Capacity Through Rezoning:

"Within the Fair Oaks Avenue Zone, it is anticipated that the maximum Floor Area Ratio will be 10.0, with an additional intensity bonus of up to a FAR of 11 available through community benefit incentives. The maximum building height for this zone is anticipated to be 110 feet and 10 stories, once the citywide height limit is repealed or replaced in this area."

SPTU submitted public comment to the Planning Commission on August 14, requesting that the City revise the plan to comply with the state housing law and Federal guidelines for fair housing. In addition to requesting the revision for the building height, we asked that they remove the action plan that would "develop and market affordable housing to artists" as this is a violation of HUD guidelines for affordable housing. In review, of the table of changes (dated August 16, 2023), the action plan earmarking affordable housing outreach efforts to a single demographic of "artists" remains and the line item regarding the repeal of the current building height limitation was revised to read:

"Consider seeking voter approval to raise the 45 foot height limit within the Downtown Specific Plan area."

I think we all know that the CAR settlement did not state that the city "would consider" a ballot measure but would commit to it. SPTU is concerned that this bait and switch strategy is an indication that the City has no intentions of following through on commitments to the State and the people.

As an example of what we can only describe as duplicitous, on June 13, the City Council was set to approve an ordinance to eliminate substantial renovation just cause evictions. Instead, the council disallowed the second reading and re-directed staff to study the economic impact on landlords. Two weeks ago, the City mailed a survey to 600 landlords, the majority who are not South Pasadena residents, asking their opinions on tenant protections. When I inquired as to how the City plans to survey tenants, I was told that it would be too expensive to mail to over 50% of the city's residents. The intentional inequity of this "study" is excruciatingly undemocratic and quite possibly violates our right to equal representation. These actions contradict the Sundown Town Resolution and serve to protect and enhance the investment interests of landlords while hanging 14,000 tenants out to dry.

SPTU remains skeptical that the General Plan will comply with State law or the adopted Housing Element. We expect that the General Plan will be further watered down as the Consultant, staff and council bow to the continued pressure of NIMBY propagandists. If such a GP is sent up to Council by the Planning Commission, we may have no choice but to request that HCD scrutinize the actions of South Pasadena more closely.

Sincerely,

Anne Bagasao, South Pasadena Tenants Union

August 20, 2023

To: South Planning Commission

Re: 2034 South Pasadena "Draft" General Plan and Downtown Specific Plan Comments

I strongly suggest that you not recommend this draft to the Council for approval for the following reasons:

Incorporating the outlandish densities of the Housing Element into these plans and the zoning code would absolutely ruin the future of South Pasadena. Anyone reading this draft would be completely unaware of what is to be. The Housing Element has 70 units/acre and 84 units/acre in some non-Specific Plan locations and 6, 7 and even 10 story buildings in the Specific Plan locations culminating in the possibility of adding approximately 13,000 units and doubling the population of the City. Yet the body of the draft recommends a high density of 45/units/acre and 4 stories max (Chap 3, p.60) in the non-Specific Plan locations. In analyzing the Housing Element, commercial lots in the Specific Plan containing Axe, Bristol Farms and Pavilions and other lots such as Ralph's are being recommended for multi-story and units/acre far in excess than what is needed.

Our mandate is to add 2067 units and this is recognized in the General Plan (Page 64). Zoning changes as reflected in the Housing Element are way too excessive to meet this goal. We have a 3.55 sq. mi. city and in no way could it support 50,000 residents. There is not, nor would there be infrastructure to support this kind of growth, including sewers, traffic configuration, school supply, just to name a few examples.

The General Plan starts off with an attitude of preserving the ambiance of our small town with comments that include keeping our character and preventing run-away growth. Yet approval of these plans would destroy this city as we and others know it.

With respect to public input, the Plans are misleading in that they show pictures of substantial public attendance at charrettes that took place **9 years ago**. Of today's 17,626 registered voters, I doubt that are anywhere near 500 in this community that have any inkling of what is going on with respect to the future density proposals.

I respectfully request that you table this discussion and initiate a proper community involvement program to achieve our housing goal.

Sincerely,

Harry A. Knapp, Former Mayor and Councilmember

417 El Centro Street

To whom it may concern.

August 21, 2023

The state has mandated that cities provide for certain levels of population growth. Apparently, South Pasadena has failed to submit proposals deemed by the state to be satisfactory, and the clock is ticking.

Suddenly, without prior notice or opportunity for the public to be heard on it, a new and drastically different proposal is apparently going to be presented to the state, by which South Pasadena promises to double the population of South Pasadena by removing all of our major shopping sites (including our major grocery stores and our only hardware store) and building multiple high-rise buildings on our already-congested streets.

The proposal states we will turn a town of about 26,000 people into one of 50,000. How will South Pasadena make our roads able to accommodate twice as many vehicles? How will it make our schools able to accommodate twice as many students? Where will South Pasadena's water supply for another 25,000 people come from, and at what cost?

The proposal sets population goals far in excess of what the state requires. This is not an aspirational proposal; if accepted, it will be set in stone. History tells us that the proposal will become the baseline on which future requirements are based. And it will happen even though water is scarce, energy is scarce, and the population will continue to grow. So this proposal is just plain bad. It shows a total failure to consider the financial, social, and environmental impact on the city.

Power outages are part of South Pasadena. Despite anyone's intentions, our house goes black multiple times in any year. How will doubling the population affect our basic grid? How will our limited water supply service twice as many people? How much will it cost us, and where will the money come from, to pay for upgraded utilities, police and fire services, and schools?

How will extreme density negatively impact the value of our homes, the quality of our schools, the condition of our roads, access to emergency services, and so forth? This is a breaking point. Our city's reputation is built on its schools and its small-town atmosphere. The proposal guts the essence of the city.

This is not to say South Pasadena should not comply with the state law; it must comply. But it should not go to the absurd extremes this proposal promises. That South Pasadena has not been able to come up with a proposal that meets state approval does not mean this proposal is good. It is not. Rather, it suggests that our City is not getting good or rational guidance.

Rather than removing our essential shopping services, straining our already-strained public services, and compressing high-rise residences into already-congested routes, the City should be looking at more realistic population density and should be proposing construction in available underused spaces on the west side of town. Do we really need undeveloped commercial areas or a golf course?

Despite the best of intentions, this plan is simply ridiculous and poorly thought out.

From:
To: [PlanningComments](#)
Cc: [CCO](#)
Subject: Draft General Plan, Downtown Specific Plan (DTSP)
Date: Monday, August 21, 2023 11:50:34 AM

City Planning Commission,

I am opposed to the proposed New General Plan and the Downtown Specific Plan.

The city needs to preserve our town as much as it can, and only do the minimum the State requires.

Again, only do the absolute minimum required by the State.

Planning for how to double the housing units and population of the city is obscene, it would ruin the important qualities of South Pasadena.

NO to doubling the housing units and population of the city

NO to tripling of allowable densities to our medium and high density areas.

NO to raising the maximum building height limits and number of allowable stories on residential buildings.

If everyone in the town knew this was going on there would be a huge protest at city hall spilling out into the street.

David Johnson
Hermosa St. resident
South Pasadena

CC South Pasadena City Council

David Johnson

From: [David Watkins](#)
To: [PlanningComments](#)
Subject: Public Comment - General Plan/Downtown Specific Plan; PEIR
Date: Monday, August 21, 2023 11:53:52 AM

Commissioner Dahl and members of the Planning Commission:

I was planning on delivering my remarks in person but I am unable to do so tonight.

First, and foremost, I strongly support the staff recommendation to adopt the resolutions before you and send these critical documents to the City Council. I urge the Planning Commission to do so. You are fully aware of the time constraints placed on the City as part of the Housing Element certification, as is the City Council. This is an unfortunate but harsh reality, and it's time to conclude this process.

But this is the end of nothing, and the beginning of a long and what will be a sometimes arduous, but absolutely critical, process of implementation. We can't afford to let the perfect be the enemy of the good (or, in this case, the very, very, very good). To do so would delay the important tasks in front of us. The Planning Commission has previously noted the attention needed as we move towards a form-based code; others have noted the debate regarding the 45-foot height limit. There will be many other details to hash out as the City moves forward, but move forward the City must. And this implementation must include vigorous public engagement of the kind not afforded by the Housing Element process that was hampered by staff turnover, COVID, and state deadlines.

Last, but not least: It will be absolutely critical that the Planning Commission take proactive ownership of these documents, in much the same way as the Finance Commission does for the budget and CIP. You will need to be active advocates for implementation of all aspects of the General Plan and DTSP, including the allocation of resources and investments in public improvements. In furtherance of that, the Planning Commission should work with staff and the City Council to establish an early role for the Commission at the beginning of the annual budget and CIP process. Your role should be much greater than rubber-stamping a CIP document at the end of the fiscal year. And, since all commissioners ultimately term out, a culture of General Plan/DTSP ownership and advocacy needs to be established and passed on to new commissioners.

Kudos to staff and the Commission for enduring this process and bringing these work products forward. And a special shout-out to Kaiser Rangwalla, whose dedication to this process was sincere and over and above.

Respectfully,

David G. Watkins, AICP-Ret.
Director of Planning & Building, 2000-2018

From: Ed Simpson
Sent: Monday, August 21, 2023 10:33 AM
To: PlanningComments
Subject: Housing

We are not supportive of the many apartment buildings that are being considered.
We believe the state did not act in the interest of resident taxpayers, and our City should not act as directed.

Seeing the stores that will be replaced by multi-storied buildings is upsetting. The convenience of the stores and sales tax revenue will be lost.

We urge our City to oppose the current plans and to work with long-time activists who have always worked to keep the quality of life in South Pasadena at a high standard.

Sincerely,

Edward and Beatrice Simpson
2038 Milan Avenue
South Pasadena, CA

From: [Alexander Aquino-Kaljakin](#)
To: [PlanningComments](#)
Subject: South Pasadena General Plan/Downtown Specific Plan - Comments
Date: Monday, August 21, 2023 11:59:48 AM
Attachments: [Care First Comment - South Pasadena Housing Element 5th Draft.pdf](#)

To Whom It May Concern,

Care First South Pasadena is supportive of the South Pasadena Housing Element and we are glad to see it incorporated into the General Plan/Downtown Specific Plan.

Please see our attached comments that we made regarding the Housing Element drafted March 24th, 2023, as they reflect our positions on the General Plan/Downtown Specific Plan as well.

And please remember, housing is a human right.

Thanks!

—
Alexander Aquino-Kaljakin
Care First South Pasadena
www.carefirstsouthpasadena.com



March 24, 2023

California Housing and Community Development
Paul.McDougall@hcd.ca.gov
Connor.finney@hcd.ca.gov

Re: South Pasadena Housing Element, Fifth Draft (March 13 Version)

Dear Mr. McDougall and Mr. Finney:

Care First South Pasadena writes to provide feedback about South Pasadena's fifth draft of the Housing Element. Care First South Pasadena is a coalition of South Pasadena residents and allies working to reimagine public safety and reallocate city dollars to reflect our community's priorities. We came together in the summer of 2020 after George Floyd's murder and amid a global pandemic with a desire for a more just and inclusive community.

Executive Summary

The March 13 version of the South Pasadena Housing Element is a mixed bag. Of note, the City's answers to our comments on this draft are unresponsive to our concerns. Where we have asked for more specific details on plans and implementation timelines, the City has provided none.

While the draft contains new promising actions to preserve and build new affordable housing, it also starkly avoids pursuing the most viable affordable housing developments over the next few years. The City's only guaranteed opportunity to develop affordable housing in this cycle of the Housing Element is through the vacant Caltrans properties, which Government Code Section 54239.4 (Senate Bill 381 (2021)) has designated for affordable use. Despite this extraordinary opportunity, the City refuses to make a firm commitment to use these vacant properties to develop for affordable housing, both for rent and for sale, as required by law because of its aversion to diversifying the neighborhoods in which these properties reside. Based on the lot sizes of the 20 vacant Caltrans homes, some 60 or more new affordable units could be developed on the lots.

- We fully support the tenant protections that the City introduced in this draft of the Housing Element. Passing ordinances for rent stabilization, relocation assistance, and the right of return for tenants will undoubtedly help preserve existing affordable housing. The City, however, should commit to a date for implementing each ordinance, rather than merely setting a date for when each ordinance must be introduced for consideration by the City Council.
- We oppose the City's position that it can explore "alternative solutions to those provided by SB 381" for the development of the 20 vacant Caltrans properties. SB 381 itself does not allow for alternative solutions outside of its strict requirements that the properties be



developed into affordable units for lease or purchase by low- and moderate-income individuals. Not only has the City failed to articulate any alternatives in this draft, but past alternatives considered by the City have been deemed unlawful by the City attorney. HCD is charged with overseeing the implementation of SB 381 and must not approve a Housing Element that defies its own policies.

- We recommend two additional amendments to the Housing Element. First, the City should specify Missing Middle housing types to include triplexes and four-plexes. Second, the City should allow for lot subdivisions throughout the City to achieve its density goals.

Goal 6.0 – Expand and strengthen tenant protections for South Pasadena’s existing renters

Program 6.a – Rent Registry

Program 6.b – Right to Return Policy

Program 6.c – Relocation Assistance

Program 6.d – Rent Stabilization

We are thrilled the City has included a comprehensive package of tenant protections in this draft of the Housing Element. The City’s commitment to establish a rent registry sets itself up to monitor the rental market in South Pasadena and to effectively enforce these tenant protections. By establishing several new tenant rights—right to return, relocation assistance, and rent stabilization—the City will be actively preserving affordable housing and ensuring housing stability for thousands of South Pasadenans. While we applaud the City staff’s efforts thus far to research, develop, and propose these policies to the City Council, the draft should contain a firm implementation date for each policy to ensure Councilmembers follow through with their commitments. **The implementation date for all policies should be no later than the end of December 2023.**

Program 1.b. – Convert Caltrans Homes to Affordable Housing

Constructing affordable units on the Caltrans sites is critical to bringing in any new affordable units in the City because there are no other sites in the City that are already obligated to hold 100% affordable housing. While the City committed to converting Caltrans homes to affordable housing on site in the March 2 version of the Housing Element draft, it completely changed course on March 13. HCD is charged with enforcing SB 381 and the disposition and development of the Caltrans homes into affordable housing. HCD must not approve this Housing Element draft that contains policy decisions contrary to the very law it must oversee. **The City should adopt the March 2 version of this program.**

In the **March 2 version**, the City wrote:

[T]he City *will* construct additional units, either as ADUs or Missing Middle housing, on



the parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City’s RHNA calculation, and will provide an additional buffer if constructed.

Redline Version, p. 266 (emphases added).

In the **March 7 and March 13 versions**, the City added a new provision about alternatives to Senate Bill 381, and walked back its commitment to construct additional units on the sites of the Caltrans properties:

To ensure the financial feasibility of acquiring the unoccupied properties and in turn leveraging them to expand housing opportunities in South Pasadena, staff will explore whether there might be any *alternative solutions to those provided by SB 381* that respond to the cost constraints of particular properties.

...

[T]he City *may consider* the construction of additional units, either as ADUs or Missing Middle housing, on *certain* parcels to provide additional lower income units if feasible. These additional units are not accounted for in the City’s RHNA calculation, and will provide an additional buffer if constructed.

See March 7 Redline Version, p. 267; and March 13 Cumulative Redline Version, p. 393 (emphases added).

Senate Bill 381 is not just one option for the disposition of the Caltrans homes. It is the only option because it is the law that governs what the City must do upon acquiring the homes from Caltrans.

In a March 8 meeting with Care First, City staff shared it is the City’s intention to comply with the spirit of Senate Bill 381—to convert the properties into affordable housing—but that it also would like to explore “alternative solutions” for certain properties. These are contradictory goals. The City identified exempt properties to include ones that have been the main subject of community debate: those located in the City’s higher resource neighborhoods. When we asked for the City’s inspection reports and other documents it is relying on to determine the feasibility of development, the City declined to share this information.¹ The City fails to provide any evidence in this Housing Element to support its conclusions that some properties are not financially feasible for development.

As explained in our December 8, 2022, comment, the City has not disclosed legally viable “alternative solutions” to the public. Mayor Jon Primuth, alongside Cultural Heritage

¹ The City has approved contracts for inspection services. *See* Agenda Items 22 and 23, City Council Meeting, July 20, 2022, <https://www.southpasadenaca.gov/home/showpublisheddocument/30038/637934174414530000>.



Commission Chair Mark Gallatin (who simultaneously sits on the board of the private non-profit organization, the South Pasadena Preservation Foundation), has publicly advocated for these solutions, despite the City Attorney's opinion that these alternatives are unlawful.² One such alternative is selling the Caltrans properties through a double escrow process and selecting preferred homebuyers vetted by the Cultural Heritage Commission. Again, Senate Bill 381 does not allow for this or other alternatives. Moreover, the Cultural Heritage Commission, which has a mandate to enforce the City's historic preservation laws rooted in racial and economic exclusion, must not be allowed to participate in any homebuyer selection process.

If the City insists on continuing to explore "alternative solutions" to Senate Bill 381 in the Housing Element, it must explain what these alternatives are and why they are legally viable. Otherwise, the Department of Housing and Community Development should not approve this Housing Element which contains policy decisions that violate the law.

Program 3.m. – Implement SB 9 and SB 10

In the **March 2 version**, the City proposed to permit Missing Middle housing types "in all residential zones citywide, except in high fire hazard areas." The City did not specify the types of

² On November 2, 2022, then-Mayor Pro Tem Jon Primuth, as one of the two members of the SB 381 implementation committee, stated at a city council meeting: "There's a proposal that we look at an alternative to SB 381. We are exploring that as one of our options as well." See http://www.spectrumstream.com/streaming/south_pasadena/2022_11_02.cfm# (starting at approximately 02:44:00).

Yet about two months prior, Primuth conceded in an email to local residents that these alternatives to SB 381 are not legally viable:

The dilemma of what to do now under the requirements of SB381 is real. But there is a persistent talk that SB381 is optional. *That's not my interpretation of the law. It's not our city attorney's interpretation of the law.* It's the interpretation of the attorney designated by the SPPF [South Pasadena Preservation Foundation] proponents for the city to retain to obtain independent advise [sic]. All the public comment we will receive tonight is based on a false assumption, repeated against the overwhelming legal counsel they have received. I've spent hours exploring the option presented by SPPF in many public comments. I pointed out the problems and dead ends with their legal strategy. I've obtained a concession from a prominent SPPF member that their route requires bending the rules. There has been no concessions from the SPPF proponents. I am sorry to go on the record to criticize them, as they are fine, trustworthy friends and neighbors.

See Attachment 1 (September 21, 2022 email).

On December 7, 2022, Mark Gallatin made public comment at a city council meeting (starting at 1:04:00) sharing that the South Pasadena Preservation Foundation had "nominated the Caltrans homes in the historic 710 corridor . . . for inclusion on the 2023 list of America's 11 Most Endangered Places [maintained by the National Trust for Historic Preservation]." During the 710 freeway fight, designating South Pasadena as an endangered city was of "invaluable assistance" to keeping the freeway away. Gallatin continued in his comments: "We need nationwide attention again to return our historic neighborhoods to pre-Caltrans conditions and get the houses sold." Returning historic neighborhoods to pre-Caltrans conditions is code for maintaining their high income levels at the exclusion of lower income households and, as a result, disproportionately excluding Black and Latinx people. See http://www.spectrumstream.com/streaming/south_pasadena/2022_12_07.cfm.



Missing Middle housing for each category of residential costs, only that they could include duplexes, triplexes, four-plexes, courtyard buildings, and cottage courts.

In the **March 7 version**, the City narrowed the Missing Middle zones to “low density residential zones along high-quality transit corridors and/or transit stops, except for in high fire hazard areas.” At this time, our position is neutral on these changes. However, we note several areas for improvement and change:

- Specify Missing Middle housing types to include triplexes and four-plexes. Without concrete commitments on density, the City risks falling short of its promises to allow for greater density in these targeted areas. For example, if the City only allows for duplexes, that will not be financially feasible for developers and will not result in greater density.
- Designate upzoning as the default policy (not an opt-in program). Staging this as an opt-in program creates another administrative hurdle in the development process rather than streamlining it; thus, this component of the program should be removed.
- Define “high fire hazard areas.” The City leaves “high fire hazard areas” undefined in this draft. Based on the City Council and staff’s public outreach discussions (e.g., Special Joint Meeting of the City Council and Planning Commission, February 15, 2023), the intent of this provision is to account for areas that have a high risk of fire. This provision should be narrowly interpreted and should not be used broadly to designate as many neighborhoods as possible as high fire hazard areas.

The City currently defines the High Risk Fire Area as those properties located south of Monterey Road, extending to the city border, and west of Meridian Avenue, extending to the city border. This is broad and vague, with little empirical data to back these findings. The City lacks the specificity found in the surrounding municipalities (*see* <https://egis.fire.ca.gov/FHSZ/>) and should not use this means of determination. It would be more appropriate to examine these based on street width and availability of fire hydrants. Further, any measurable risk determination should shape the design methods used, but not prevent development. This blanket designation fails to acknowledge the many existing construction methods that can mitigate these risks.

- While the City is separated into zoned parcels (RE, AM, RS, RM, RH, MSSP), the City is not utilizing data that correlates household demographic information to these parcels. The City is using census tract data boundaries to define that demographic data. That is entirely inadequate, given that the city only intends to increase density along transit corridors.

The parcels that currently contain the most demographic diversity will have their densities increased while the more homogenous regions will remain significantly lower – despite their proximity to available resources and their relatively flat topography. The largest, flattest, lots in the City are currently zoned RE – and the current draft of the



Housing Element largely omits those lots from any future density development. Given the small area that the City covers, restricting density to transit corridors largely serves the purpose of keeping density contained where it currently exists.

- Allow lot subdivisions. Another inadequate method being proposed is the use of SB 9 lot splits to achieve greater density. To date there has not been a single SB 9 lot split approved in the City. Studies have shown that the legal requirements of SB 9 splits make them prohibitive (*see <https://turnercenter.berkeley.edu/research-and-policy/sb-9-turns-one-applications/>*). South Pasadena relies on this inadequate method because there is not true intention to allow for more diverse development. The underlying principle in the city's programming is that current property owners can increase density via ADUs. But this does not provide equitable pathways to ownership and upwards mobility, it reinforces existing socioeconomic boundaries. A much more equitable means would be allowing lot subdivisions. The city's Housing Element has only allowed for lot consolidations along existing corridors.

Thank you for considering our comments.

Sincerely,

Helen Tran
Care First South Pasadena

From: Jon Primuth
Sent: Thursday, September 22, 2022 12:30 AM PDT
To: Brad Feldman <brad@bradfeldman.com>
Subject: Re: So. Pas 9/21 Special Meeting- Closed Session

Brad - we only can sell the historic properties at fair market value. A sale of all other properties must be to an income qualified buyer at an affordable price (formula that puts a price cap) and carries an affordability covenant. That requires buyer screening, qualification and financing.

From: Brad Feldman <brad@bradfeldman.com>
Sent: Wednesday, September 21, 2022 6:28 PM
To: Jon Primuth
Subject: Re: So. Pas 9/21 Special Meeting- Closed Session

<p>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.</p>

Jon if the city can buy a property for \$30k and puts the property up for sale "As Is" and sells it at market and the market is willing to pay \$1MM are you saying that's not allowed?

Or can the city then take the profits from the sale and then use the profits to incentivize affordable housing?

Brad

Excuse typos. Sent from mobile.

From: Jon Primuth <jprimuth@southpasadenaca.gov>
Sent: Wednesday, September 21, 2022 5:08:50 PM
To: Brad Feldman <brad@bradfeldman.com>
Cc: rosalinacardenas5@gmail.com <rosalinacardenas5@gmail.com>; chrissy.feldman@me.com <chrissy.feldman@me.com>; Larry Wingard <landmarkcc@att.net>; Mike Girvigian <dr mike5000@yahoo.com>; Cardenas, Frank <fcarden7@calstatela.edu>; knwingard@att.net <knwingard@att.net>
Subject: Re: So. Pas 9/21 Special Meeting- Closed Session

Here is what you need to know:

1. The new state law on selling the South Pasadena Caltrans homes (SB381) gives the city priority to purchase the existing vacant homes from Caltrans.
2. Pursuant to the legal timeline in the new law, Caltrans offered the city 21 vacant homes in June. The city has notified Caltrans of its intent to purchase. These include one of the vacant houses on Columbia. The historic home on Prospect is not part of Caltrans initial offer to the city, as that property is tenant occupied. We will execute a purchase agreement in Oct/Nov and then close escrow perhaps in early 2023.
3. The city can purchase the homes at the old acquisition price. This is an incredibly low price, far below market value even though the properties are dilapidated.
4. All tenant occupied homes are being offered to the tenants. If the tenants don't purchase, the properties will be offered to South Pas next year once Caltrans gets through its tenant-sale process with all the current tenant occupied properties.
5. So at this initial stage of Caltrans homes will take one of three different paths: vacant properties are being offered to the city now (2022); tenant purchased properties will be sold directly to the tenants during 2022 and 2023; unsold tenant-occupied properties will be offered to the city 2023.
6. The preservation foundation has a different plan for the houses which they have insisted over and over again is completely feasible, doable and legal. Every expert I have talked to, including an expert picked by the foundation members, says it is not legal or feasible. I have told them of my strong reservations; all sources I've checked indicate that their proposal (specifically, to ignore SB381's sale priorities and force Caltrans to sell the houses to individual buyers after a closed door meeting with "all the key players" including Holden and Portantino's offices) is a dead end.
7. The city council is facing a real dilemma: whether to take control of the houses, that is, purchase them as they are offered by Caltrans under SB381, or decline to purchase and let Caltrans offer them to the next priority buyer. The next priority buyer under SB381 is a Housing Related Entity, according to the statute. In promulgating the SB381 regulations, Caltrans spun this statutory term to mean the "County of Los Angeles." So the backup buyer to ALL non-historic Caltrans properties not purchased tenants or the city of South Pasadena is the County of Los Angeles and the HREs who are affiliated with the County.
8. You have to break down the process into very discrete steps. First step is, should the city or the county control the disposition of these properties? The city council in notifying Caltrans of their intent to purchase these first 20 properties offered by Caltrans, took control of the disposition of these properties.
9. The next question is should the city actually complete the purchase of these properties. We have locked down the right to purchase to avoid a county purchase. Now what? Initial discussion from city and some council members (not me) was to use nonprofits to develop the properties into affordable housing. That is an option (not a good one), but it is out there.

The council has not had any formal discussion on that. My preference is to resell to individual buyers, to get the twin benefits of homeownership and property tax on the private owners.

10. The city has an outside consultant crunching the numbers on rehab and resale of these properties. The law (SB381) requires the properties to be preserved as affordable housing for households at no more than 120% of area median income. Translating the highest income group (120%) spending no more than 30% on "housing cost" (mortgage, taxes and interest) into a sale price, the city has a legal price cap of \$400,000-\$550,000 for each property.

11. The city must pay prevailing wages on any rehabilitation of these properties. So for example if the city purchases a property from Caltrans at the old acquisition price of \$30,000, the city has \$370,000 of equity to finance the rehabilitation and pay for soft costs, to break even at \$400,000. That could be feasible. But each property is unique. A property with a higher acquisition cost and so dilapidated it requires almost tear-down rehab, the price cap on resale makes it impossible to break even selling a rehabbed home to an individual homeowner. Alternatively, the city could resell to a private homeowner at a heavily discount price to allow the new owner to self-finance the rehab using their equity. This is my preferred alternative. The problem is, a moderate income buyer probably cannot afford to purchase and, more to the point, finance a huge home equity loan and do rehab on their new house for 8-12 months while paying for another place to live.

12. A private buyer from the city does not have to pay prevailing wages. The city and nonprofit HRE doing the rehab will have to pay prevailing wages. So a private sale to private owner is the only realistic way to avoid impact of prevailing wages, which adds 30% or more to the rehab cost and pushes many properties into the economically not feasible category.

13. The prevailing wage requirement for the city and all HREs was a last minute change to the law before it emerged from the legislature. We didn't expect that addition at the time; in retrospect we should have. Knowing the prevailing wage requirement would have changed my mind about supporting SB381.

14. The dilemma of what to do now under the requirements of SB381 is real. But there is a persistent talk that SB381 is optional. That's not my interpretation of the law. It's not our city attorney's interpretation of the law. It's the interpretation of the attorney designated by the SPPF proponents for the city to retain to obtain independent advise. All the public comment we will receive tonight is based on a false assumption, repeated against the overwhelming legal counsel they have received. I've spent hours exploring the option presented by SPPF in many public comments. I pointed out the problems and dead ends with their legal strategy. I've obtained a concession from a prominent SPPF member that their route requires bending the rules. There has been no concessions from the SPPF proponents. I am sorry to go on the record to criticize them, as they are fine, trustworthy friends and neighbors.

15. The SPPF idea that a back room meeting of "players" can solve the problem and avoid the clear mandate of SB381 is not in any sense a rational plan, in my opinion. Although I've pointed out the legal mistakes several times, the proponents are undeterred and simply wave my concerns away.

16. The new era and reality, affordable housing advocates and unions will police compliance with SB381 to enforce affordability and prevailing wage restrictions. The city "bends the rules" on SB381 at its extreme peril. If we tried the back-room, high powered strategy to avoid SB381, all properties could (and in my opinion would) end up in litigation.

17. The city needs to solve the problem. It is daunting. But what the entire council was united on is, we will keep control of these properties and not let the County take them for nonprofit development.

18. Once you clear out the smoke of the false reality that SB381 is "optional" (their words), then we can move forward with a conversation on how to develop the properties with affordability restrictions, prevailing wages, and economic feasibility issues; i.e., what SB381 requires. SPPF has banked their entire credibility on this issue, stirring up mistrust and anger at the council based on a fundamental misunderstanding of the legal context. I've done a lot of work researching, consulting, listening and being open to new ideas (hours of listening), talkin' to their experts; I haven't found a viable alternative to what the council is pursuing.

19. The council will provide direction on the ultimate disposition given the legal constraints. I prefer the homeownership pathway, not development by HREs. That will be a point of discussion at future meetings.

From: Brad Feldman <brad@bradfeldman.com>

Sent: Tuesday, September 20, 2022 10:58 PM

To: Jon Primuth

Cc: rosalinacardenas5@gmail.com; chrissy.feldman@me.com; Larry Wingard; Mike Girvigian; Cardenas, Frank; knwingard@att.net

Subject: So. Pas 9/21 Special Meeting- Closed Session

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.

Jon – I got a notice on my door tonight that there is a closed session special meeting tomorrow (Wednesday 9/21) regarding the sale or leasing of cal trans houses to Housing Related Entities. The notice said that you are looking to sell these cal trans homes to Housing Related Entities that can develop the properties as they see fit with group homes, transitional housing, or quasi-commercial uses such as half-way houses, drug rehabs, etc... I don't know if this is a hit piece on you and the rest of the council but I sure hope that is not the plan of the council.

I don't want to second guess what I'm sure are your good intentions, but if you are to represent my desires as part of your district please propose that the city does the right thing and puts the Caltrans homes up for market sale and allows them to sell in the open market at the highest market value. Take the proceeds of the sale and then decide where the money can be best used to serve the goals of the city. DO NOT, try to architect the buyer, the use, the sale, etc.. You may have great intentions but doing so will unlikely lead to the outcome you are trying to architect. This neighborhood and the people of this neighborhood are not served by having non-home owners come in with intentions that differ from the neighbors that surround them which I suspect is to raise families, attend great schools, and live in a community near large city amenities.

If you want to create affordable high density housing, halfway houses, drug rehab, transitional housing, etc... and you think that is the best use of the proceeds on behalf of the residents of the city then you can use the proceeds from the sale of the Caltrans homes to invest in those programs. But separate these two things so that you don't become the unintended architect of destroying the communities you are trying to protect.

Please call me if you would like to discuss.

Brad

Brad Feldman
430 Prospect Circle
(310) 413-0833